Peerless Pump Company

4.1 General Requirements

Peerless Pump Company has established and maintains an environmental management system. The scope of the environmental management system includes the Indianapolis Facility.

4.2 Environmental Policy

Top management has defined the environmental management policy and ensures that it:

a) Is appropriate to the nature, scale and environmental impacts of our activities, products or services;

b) Includes a commitment to continual improvement and prevention of pollution;

c) Includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which we subscribe which relates to our environmental aspects;

d) Provides the framework for setting and reviewing environmental objectives and targets;

e) Is documented, implemented, maintained and communicated to all persons working for or on behalf of Peerless Pump Company; and

f) Is available to the public by posting, at a minimum, a copy in the lobby and on the website.

4.3 Planning

4.3.1 Environmental Aspects

We have established and maintain a procedure (EP 4.3.01 Identification of Aspects) to identify the environmental aspects of our activities, products and services that we can control and those that we can influence taking into account planned or new developments, or new or modified activities, products and services in order to determine those, which have or can have significant impacts on the environment. We have ensured that the aspects related to these significant impacts are considered in maintaining the environmental management system. We keep this information up-to-date.
4.3.2 Legal and Other Requirements

We have established and maintain a procedure (EP 4.3.02 Legal and Other Requirements) to identify and have access to legal and other requirements to which we subscribe, that are applicable to the environmental aspects of our activities, products or services. Furthermore, we have determined how these requirements apply to the environmental aspects and take them into account in maintaining the environmental management system.

4.3.3 Objectives and Targets and Environmental Management Program(s)

We have established and maintain documented environmental objectives and targets, at each relevant function and level.

When establishing and reviewing our objectives, we consider legal and other requirements, our significant environmental aspects, our technological options, financial, operational and business requirements, and the views of interested parties.

The objectives and targets are measurable, where practicable, consistent with the environmental policy, including the commitment to prevention of pollution, compliance with applicable legal and other requirements to which we subscribe, and to continual improvement. (EP 4.3.01 Identification of Aspects)

We have established and maintain programs for achieving our objectives and targets. They include the designation of responsibility for achieving objectives and targets at each relevant function and level of our organization and the means and time frame by which they are to be achieved.

If a project relates to new developments and new or modified activities, products or services, programs have been amended where relevant to ensure that environmental management applies to such projects. (EP 4.3.01 Identification of Aspects)

4.4 Implementation and Operation

4.4.1 Resources, roles, responsibility, and authority

We have established and maintain a procedure (EP 4.4.01 Resources, Roles, Responsibility and Authority) to define, document and communicate EMS roles and responsibilities.
Top management has provided resources essential to the implementation and control of the environmental management system. The resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

Top management has appointed a management representative, who, irrespective of other responsibilities, has defined roles, responsibilities and authority for:

a) Ensuring that environmental management system requirements are established implemented and maintained in accordance with this international standard.

b) Reporting on the performance of the environmental management system and providing recommendations for improvement to top management for review and as a basis for improvement of the environmental management system.

4.4.2 Competence, training, and awareness

We have identified training needs for all personnel and for those working on behalf of Peerless Pump, whose work may create a significant impact upon the environment. We have established and maintain a procedure (EP 4.4.02 Environmental Training Procedure) to make personnel at each relevant function and level aware of:

a) The importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system;

b) The significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;

c) Their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements;

d) The potential consequences of departure from specified operating procedures.

Peerless Pump personnel or contractors performing tasks, which can cause significant environmental impacts, are competent based on appropriate education, training and/or experience.

4.4.3 Communication

With regard to our environmental management system and environmental aspects, we have established and maintain a procedure (EP 4.4.03 Communication) for:

a) Internal communication between the various levels and functions;
b) Receiving, documenting and responding to relevant communication from external interested parties.

Peerless Pump has considered external communication of its significant environmental aspects and at this time has decided not to communicate these outside of the company.

4.4.4 Documentation

We have established and maintain information, in both paper and electronic form to:

a) Describe the core elements of the management system and their interaction (EMS manual).
b) Provide direction to related documentation.

4.4.5 Control of Documents

We have established and maintain procedures for controlling all documents (EQP 4.2 Documentation Requirements) required by this international standard to ensure that:

a) They can be located.
b) They are approved prior to issuance and periodically reviewed, revised as necessary and approved for adequacy by authorized personnel.
c) The current versions of relevant documents are available to personnel in operations essential to the effective functioning of the environmental management system.
d) Obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use.
e) Any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.
f) Documents of external origin that are necessary for the planning or operation of the environmental management system are identified and their distribution is controlled.

Documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner and retained for a specified period. Procedures and responsibilities have been established and maintained concerning the creation and modification of the various types of documentation (EQP 4.2 Documentation Requirements). (Records are considered a special type of document and are discussed in section 4.5.4 of this manual.)

4.4.6 Operational Control

The master, on-line version of this document is controlled. All other copies, including electronic copies are uncontrolled and will be used for reference only.
We have identified operations and activities that are associated with the identified significant environmental aspects consistent with our policy, objectives and targets. We have planned these activities, including maintenance, in order to ensure that they are carried out under specified conditions by:

a) Establishing and maintaining documented procedures to control situations where their absence could lead to deviations from the environmental policy and the objectives and targets;
b) Stipulating operating criteria in the procedures;
c) Establishing, implementing, and maintaining procedures related to the identifiable significant environmental aspects of goods and services used by our Indianapolis Facility and communicating relevant procedures and requirements to suppliers, including contractors.

4.4.7 Emergency Preparedness and Response

We have established, implemented and maintain procedures to identify potential emergency situations and potential accidents that can have an impact(s) on the environment and how we will respond to them. We shall respond to actual emergency situations and accidents and prevent or mitigate associated adverse environmental impacts. (EP 4.4.04 Emergency Preparedness Response)

We review and revise, as necessary, our emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations.

We also periodically test such procedures where it is possible to do so.

4.5 Checking

4.5.1 Monitoring and Measurement

We have established and maintain documented procedures to monitor and measure, on a regular basis, the key characteristics of our operations and activities that can have a significant impact on the environment (EP 4.5.01 Monitoring and Measurement). This includes the recording of information to track performance, relevant operational controls and conformance with our environmental objectives and targets.

Monitoring equipment has been calibrated and maintained and records of this process have been retained according to the integrated quality system procedure (EQP 4.2 Documentation Requirements).
4.5.2 Evaluation of Compliance

We have established and maintain a documented procedure for periodically evaluating compliance with relevant environmental legislation and regulations and other requirements (EP 4.5.02 Evaluation of Compliance).

4.5.3 Nonconformance and Corrective and Preventive Action

We have established and maintain procedures for defining responsibility and authority for handling and investigating actual and potential nonconformances (EQP 8.5 Corrective and Preventive Action), taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action.

Any corrective or preventive action taken to eliminate the causes of actual and potential nonconformances is appropriate to the magnitude of problems and commensurate with the environmental impact encountered. The CPAR action plans include provisions for preventing occurrence or recurrence and reviewing effectiveness.

We implement and record any changes in documented procedures resulting from corrective and preventive action.

4.5.4 Control of Records

We have established and maintain procedures for the identification, maintenance and disposition of environmental records (EQP 4.2 Documentation Requirements). These records include, but are not limited to, training records and the results of audits and reviews.

Environmental records are legible, identifiable and traceable to the activity, product or service involved. Environmental records are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. Their retention times have been established and recorded.

Records are maintained as appropriate to the system and to our facility, to demonstrate conformance to our EMS.

4.5.5 Internal Audit
We have established and maintain a program and procedures (EQP 8.2 Monitoring and Measurement) for periodic environmental management system audits to be carried out, in order to:

a) Determine whether or not the environmental management system

   1) Conforms to planned arrangements for environmental management including the requirements of the International Standard; and
   2) Has been properly implemented and maintained; and

b) Provides information on the results of audits to management.

Our audit program, including schedule, has been based on the environmental importance of the activity concerned and the results of previous audits. In order to be comprehensive, the audit procedures cover the audit scope, criteria, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results.

4.6 Management Review

Top management reviews the environmental management system to ensure its continuing suitability, adequacy and effectiveness in accordance with EQP 5.6, Management Review. The management review process ensures that the necessary information is collected to allow management to carry out this evaluation. The review is documented.

The management review addresses the possible need for changes to policy, objectives and other elements of the environmental management system, in the light of environmental management system audit results, the EMR’s recommendations for improvement, changing circumstances and the commitment to continual improvement.

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