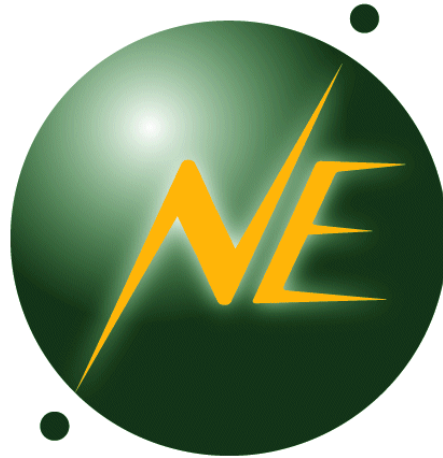


# New England Wire Technologies



## Environmental Stewardship Plan

### Environmental Policy

We are committed to be conscious of and responsible for our effect on the environment. We will conduct our operations while adhering to the following guiding principles:

- We commit to comply with applicable environmental laws.
- We will enact programs to prevent pollution and reduce waste.
- We will promote re-use and recycling wherever possible.
- We endeavor to be eco-friendly by minimizing use of natural resources.
- We will establish and regularly review our environmental objectives.
- We will promote environmental awareness among employees, suppliers, contractors and visitors through information and training and setting expectations.

## Environmental Stewardship - Table of Contents

Policy and Procedures.....	1-2
Material Usage .....	3
Re-use .....	4
Recycling .....	5
Copper	
Plastics	
Copper Paper & Mud	
Office Paper	
Aluminum Cans	
Plastic Containers	
Steel	
Toner Cartridges	
Magazines	
Cardboard	
Energy Reduction .....	6
Materials Disposal .....	7
Regulatory Compliance .....	8
Security.....	9
Packaging.....	9
Engaging Supply Chain in waste reduction .....	9

## Policies

### Environmental Policy

We are committed to be conscious of and responsible for our effect on the environment. We will conduct our operations while adhering to the following guiding principles:

- We commit to comply with applicable environmental laws.
- We will enact programs to prevent pollution and reduce waste.
- We will promote re-use and recycling wherever possible.
- We endeavor to be eco-friendly by minimizing use of natural resources.
- We will establish and regularly review our environmental objectives.
- We will promote environmental awareness among employees, suppliers, contractors and visitors through information and training and setting expectations.

Further, there are specific programs that guide actions for specific business needs. Each of the identified programs have details, procedures and activities defined to accomplish the goals of that program.

#### RoHS (Green Line) Program

This program (POL 1220) identifies how NEWTC handles requests from customers that require products that do not contain specific hazardous substances. NEWTC will design products using “Green Line” raw materials whenever possible. NEWTC will also work with suppliers to develop other new materials that do not contain hazardous substances.

#### Materials Monitoring Program

Various raw materials are tested for cadmium, lead, mercury, chromium, and bromine with an XRF scanning device. Testing is performed on an audit basis, quarterly (ENG1211). Select plastics are tested at incoming inspection upon arrival at the facility.

#### Storm Water Pollution Prevention Program

This program is intended to assure compliance with the National Pollution Discharge Elimination System (NPDES) requirements for Storm Water Pollution Prevention at NEWTC. This plan is required per the NPDES Storm Water Multi-Sector General Permit maintained by NEWTC. Permit requirements and NEWTC methods of compliance are described in this plan.

#### Underground Storage Tank Program

The intent of this program is to assure compliance with all local, state and federal regulations concerning the underground storage tanks (UST) at New England Wire Technologies.

#### POTW (Sewer) Plan

The intent of this program is to assure the proper permitting and discharge of industrial wastewater to the Publicly-Owned Treatment Works (POTW). It describes in detail the conditions of the water usage at NEWTC and describes the testing and frequency of testing of the industrial discharge water. This plan also describes the response to a discharge above limits (slug discharge).

#### Waste Management Plan

This plan is intended to assure proper disposal of wastes generated by NEWTC. This is accomplished through waste classification, proper storage and disposal, frequent inspection of waste storage areas, and training. These items will be described in this plan. The Hazardous Waste Coordinator (HWC) administers the Waste Management Plan with assistance from the Maintenance Department.

## Material Usage

New England Wire Technologies has been diligent in its selection of materials used. Some of these materials are used in products delivered to the end user while some are used for processing during manufacturing. We have been modifying products and processes to minimize the use of hazardous materials.

One of the major efforts in this regard has been the re-assignment of materials to RoHS compliant materials. Many of the plastics and some of the conductors had components that were banned by the RoHS standards. In an effort starting in 2003, we began to convert much of our production to RoHS compliant materials.

There are still some non-RoHS materials being used, but these are on a case-by-case basis based on specific customer demands. Since the beginning of this effort, we have cut our hazardous materials usage significantly.

Process materials have been changed and process management has been changed to reduce hazardous material usage.

The old ink jet printers have been replaced. The new printers required only 30% of the MEK used by the old printers. This results in less air pollution and less hazardous waste.

The tin plating line was converted from Methane Sulfonic Acid to the less toxic Stannous Sulfate chemistry.

Many years ago, some of the cooling water was taken from the domestic water supply, used to cool the product, and discharged into the Ammonusic River. These were converted to closed loop cooling water systems. There is no discharge to the river of any process cooling water.

## **Re-use**

The most effective pollution prevention and source reduction activity is to re-use existing products. New England Wire Technologies has pursued this activity in certain areas.

In 2003, we began reclaiming and re-using FEP products mixed with color concentrates. Prior to this time any left over mixed products were discarded. While the materials are not considered toxic, it was a waste. The operator now collects all un-melted pellets and keeps these in segregated and labeled containers. The next time an order calls for the same compound and color mixture, the saved pellets can be used. This is a savings in resources and waste production.

Obsolete computers are also sent for re-use. NEWTC has sent obsolete but working computers to Donation Network where they are refurbished and distributed to schools and needy families. This activity takes place sporadically when the number of computers is sufficient. In 2005, 49 computers and a variety of other computer equipment were delivered to the charity. In 2007, another 49 computers, two laser printers and other items were delivered. Further, some more obsolete but recent computers are raffled to New England Wire Technologies employees.

Obsolete cell phones are sent to a domestic violence organization that distributes them for 911 use. This program was also opened to New England Wire Technologies employee participation.

## Recycling

Recycling activities occur for many materials used at New England Wire Technologies. Individuals are assigned responsibility to assure that certain materials are appropriately collected and transferred for recycling. Some of these activities are part of the business practices (copper and plastics), while others are volunteer efforts (aluminum cans and magazines).

### Copper

Bare and plated copper are collected in Gaylords throughout the facility. These are returned to recycling facilities. These are valuable materials and recycling is nearly 100%.

Wire with extruded jacketing is also recycled. The reimbursement is not as attractive, but it is not discarded into the landfill.

All alloys and non-copper products are collected and recycled.

### Plastics

New England Wire Technologies processes a variety of plastic types. Scrap for these materials are separated and collected by material type. The scrap is then sent for recycling.

### Copper Paper & Mud

Copper contaminated filter paper and circulating tank residue (mud) is collected for recycle. This material is sent to a smelting operation to recover the copper.

### Steel

Miscellaneous steel, aluminum and other metal components are collected for recycle. These mixed items are collected in a Gaylord and transferred to a local sorting and recycling facility.

### Office Paper

Office paper is collected from numerous locations, shredded and sent for recycling.

### Aluminum Cans and Plastic Containers

Aluminum cans and plastic containers are collected near every vending area. These items are transferred to a local recycler.

### Toner Cartridges

Toner cartridges are collected by the Lisbon Basketball boosters. They are sent for recycling.

### Magazines

Magazines and newspapers are collected in Gaylords. These are sent to a local recycling facility. For the first 6 months of this program 3200 lbs of materials were collected.

### Cardboard

Cardboard is collected and transferred to a local recycling facility.

## Energy Reduction

Many activities have occurred to reduce the energy required at New England Wire Technologies.

### Re-Lamping Factory 2003

The factory was completely re-lamped in 2003. The old metal-halide fixtures were abandoned and new high efficiency T8 bulbs with high efficiency ballasts were installed. This work was completed with a partial grant from the power company.

### Use of XL bulbs to maximize duration of bulb life

The bulbs used in the 2003 re-lamping were due for replacement in 2008. The replacement bulbs that were chosen were the extended life bulbs. This should extend the useful life of the bulb by 20%.

### Ventilation Air Tempering

The air handling units on the roof are all outfitted with air tempering sections. These sections transfer heat from the warm exhaust to the cold intake (in the cold season). This reduces directly the amount of energy required to heat the intake air. Typically we see a 10 to 20°F rise in the intake air.

### VFD's on nearly all large motors

Most large motors have Variable Frequency Drives installed to control them. The VFD's have two energy reduction benefits. First, they can run the device at the minimum speed required to do the job. Second, they allow a slow ramp to speed rather than an 'across the line' startup. Both actions reduce the energy used. The VFDs used for ventilation were purchased with a partial grant from the power company.

### Boiler Temperature follows outside air temperature

The hot water boilers used for space heating have a feature that allows the boiler temperature to inversely track the outside temperature. If it is not very cold outside, the boiler temperature is allowed to be 130°F. If it is very cold outside, the boiler will run at 165°F. At the warmer outside temperatures, the losses from a cooler boiler are less than the losses from a hotter boiler.

## **Materials Disposal**

New England Wire Technologies disposes of materials to many sources. Those that can be re-used, or recycled are handled appropriately. Some materials however must be discarded. Materials are handled in different manners depending on their characteristics.

### **Hazardous Materials**

Any hazardous materials are shipped to a qualified, certified and verified hazardous waste handler. Our choice of handler has an exemplary reputation. These transfers are handled under the regulation of the New Hampshire Department of Environmental Safety, the Federal Environmental Protection Agency, and the Federal Department of Transportation. Records are kept of all materials shipments including the Hazardous Waste Manifest.

### **Non-Hazardous drawing solution to a specialty handler**

This is a material that does not fit the classification of hazardous, but must be disposed of. It cannot be discarded in the sewer, so it is shipped by tanker truck to the handler. From there it is separated into its constituents and processed. Other vendors may be considered for this activity in the future to help reduce transportation costs.

### **Old computers and electronics**

Approximately every four years, non-usable computers and electronics are collected and sent for recycling. This program is opened up to allow employees to deposit items from home also. These devices are recycled in the United States at EPA-approved recycling centers. Some of the specific materials that are recycled include mercury from video monitors and lead in plastics. In 2003, a 24 cubic yard shipping container was used. In 2007, 9240 lbs of electronics were recycled this way.

## **Regulatory Compliance**

New England Wire Technologies is required to meet many environmental requirements by local, state and federal agencies. Sometimes the authority for these laws is shared by local, state and federal agencies. NEWTC complies with all applicable environmental laws.

### **Storm Water including BMPs and Source Reduction**

Storm water discharges are regulated by state and federal laws. The storm water program also includes a yearly review of Best Management Practices and source reduction activities.

### **POTW – Sewer**

The POTW use plan is regulated by local, state and federal agencies. We have very few approved uses of the town owned sewer. New England Wire Technologies will only discharge those approved discharge sources and must never put the town sewer plant at risk of missing its performance requirements.

### **Underground Storage Tanks**

New England Wire Technologies has two underground storage tanks for heating oil. These are controlled by a state agency. We perform testing, monitoring and reporting to satisfy the state program.

### **Contingency Plan**

Any facility with hazardous materials must have a plan to handle unexpected releases of those hazardous materials. New England Wire Technologies has created, reviewed, revised, trained and re-trained on its contingency plan. We believe that it is well crafted and will provide the protection to the environment (and personnel) in the event of an unplanned release.

### **TRI and EPCRA Tier II**

Certain federal reporting requirements exist for New England Wire Technologies. Specifically the TRI, Toxic Release Inventory about the total amount of toxic materials released into the environment from all sources must be completed yearly. The EPCRA Tier II report covers the Community Right to Know information which is also due yearly.

## **Security**

New England Wire Technologies keeps the hazardous waste room locked except when in use. This is a requirement by NH DES and the EPA.

## **Packaging**

New England Wire Technologies promotes recycling and reuse wherever possible.

## **Engaging Supply Chain in waste reduction**

New England Wire Technologies encourages suppliers to adopt environmental stewardship practices when contracting and reviewing performance with suppliers.