



ISO 14001 POLICY STATEMENT

Environmental Health and Safety Program

1.1 INTRODUCTION

Under the guidelines of ISO 14001 the management personnel of WJ Communications, Inc. (WJ) accepts this Policy Statement as part of its employee safety program and its commitment to continual improvement in the prevention of environmental degradation and pollution.

The success of the overall program is dependent upon every employee's recognition and fulfillment of his or her program responsibilities. Presented below are the general responsibilities assigned at each level, and the environmental compliance regulatory framework within which WJ operates its facilities. Specific responsibilities are addressed in the following individual program elements.

Moreover, WJ wishes to express a worldview in terms of environmental responsibility and the protection of the planet. Prudent stewardship of our global resources as well as protection of the interactive systems which support and make life possible are the responsibility of every corporate citizen that uses potentially hazardous substances as a part of its operations. WJ shares the concerns regarding atmospheric ozone depletion by CFC's and supports the 1987 Montreal Protocol and its subsequent amendment agreements.

WJ places the highest importance on proactive compliance with all relevant environmental as well as worker health and safety laws and regulations. The Manager of Environmental Health and Safety shall be responsible for the administration of all such programs.

1.2 MANAGEMENT COMMITMENT

The management at WJ Communications, Inc. assumes the responsibility for creating and maintaining a proactive company environmental compliance program. Employees who raise environmental, safety and health issues are assured that there will be no retaliation against them for their suggestions.

Management will assure a commitment to adherence to the program and continual improvement through the following:

- (a) Financial support through the provision of funds for the hiring of competent professionals and consultants; allowing adequate employee time for personnel training; the purchase of environmental pollution control equipment and materials; and the installation of necessary hazard control measures.



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- (b) Regular review of the status of environmental compliance issues in each manager's responsibility area and exercising the authority necessary to correct any deficiencies indicated by such reviews.
- (c) Provision for employee involvement in environmental compliance and pollution prevention concerns through the establishment of environmental health and safety committees, program performance evaluations, environmental systems audits, and other means.
- (d) Establishment of annual goals for the environmental health and safety program at WJ and through periodic evaluation of all phases of the program to determine its effectiveness relative to the goals and regulatory requirements.

1.3 **MANAGER OF ENVIRONMENTAL HEALTH & SAFETY (Responsible Person)**

By virtue of his or her knowledge and experience, the Manager of Environmental Health & Safety (Manager) has the central role in assuring the adequacy and implementation of the ISO 14001 environmental program. His or her general responsibilities will include:

- (a) Administration of the existing program and formulation of program and policy changes as warranted by company environmental and safety directives or conditions at the facility.
- (b) Act in an advisory capacity for all environmental health and safety concerns at the facility.
- (c) Identify and evaluate existing and potential sources of environmental pollution generated at the facility.
- (d) Participate in facility environmental inspections. Following up on deficiencies noted in inspections. Establish and/or review methods and procedures for correcting environmentally unsafe and unhealthy conditions and work practices.
- (e) Ensure that employees receive training in general and specific environmentally safe work practices for the company and in each job assignment. Supervise employee-training programs.
- (f) Review federal, state and local regulations to assure compliance.
- (g) Ensure that records on training, inspections and corrective measures are properly maintained as required by specific sections of this Procedure.

1.4 **SUPERVISORY PERSONNEL**

Supervisors play a key role in the program. They have the direct responsibility for implementing many of the program requirements. Principal responsibilities include:

- (a) Working with the Manager to develop safe and responsible work rules applicable to the operations within their departments.



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- (b) Performing regular environmental health and safety inspections of the work areas to identify unsafe conditions and potential sources of pollution.
- (c) Being a leader in department safety and environmental awareness, setting a good example by following Company rules and procedures.
- (d) Taking appropriate disciplinary action in conjunction with the Human Resources Department when safety policies, rules, or procedures are violated.

1.5 EMPLOYEES

All employees have a responsibility to work safely for the protection of themselves and their fellow workers, and to support all Company environmental protection efforts. Specific responsibilities within the program include:

- (a) Learning the safety and environmental procedures and rules for the facility and his or her department.
- (b) Complying with all environmental safety and health rules established at the facility.
- (c) Reporting any unsafe or potentially polluting conditions or actions observed in the workplace.
- (d) Reporting accidents or near misses.

1.6 EMPLOYEE INVOLVEMENT AND PARTICIPATION

The involvement and participation of employees is critical to the success of WJ's Environmental Safety and Health Program. Employees should be encouraged to participate in program development and implementation and in the settling of safety and health issues. Such participation is necessary for the following reasons:

- (a) Employees are more likely to support programs and policies in which they have had some input.
- (b) Employees are often closer to environmental safety and health issues and are more likely to offer workable solutions.
- (c) Encouragement of employee participation by management promotes employee morale by illustrating management's concern.

1.7 ENVIRONMENTAL FACILITY PERMITS AND RELEVANT REGULATIONS

WJ is subject to the following environmental operating permits and regulatory issues. We are committed to full compliance with all the requirements and provisions of each of these in fact and in spirit, for the protection of the natural environment and the health and safety of our employees and the general public:



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1.7.1 Industrial Wastewater Discharges - as administered by the San Jose/Santa Clara Water Pollution Control Plant (Plant). WJ operates a wastewater pH adjustment (treatment) system under permit from the Plant. All treated discharges are subject to evaluation and are recorded by automatic equipment at the facility. Continuous monitoring of the system is conducted, as well as periodic Self-Monitoring Reports to the Plant. The Plant is itself permitted via the California State Water Resources Board, which in turn is licensed under provision of the U.S. Clean Water Act, by the federal Environmental Protection Agency.

1.7.2 Air Pollutant Discharge Emission Sources - as administered by the Bay Area Air Quality Management District. The use of volatile chemicals may require permitting. Individual conditions are typically included to require ongoing monitoring of the chemicals, which are used, and limit annual permitted quantities.

1.7.3 Hazardous Materials - Storage/Use Permit as administered by the relevant local administering agency (i.e. Fire Department). Requires that all chemicals and processes on site be documented in a Hazardous Materials Management Plan (HMMP) and be fully disclosed to the administering agency. Storage and management of all such materials are subject to the Uniform Fire Code and the Uniform Building Code. Regular compliance inspections are typically performed at the site by the local administering agency.

Annual evaluation is performed for presence and use of materials listed as Superfund, section 313 chemicals. Any such listed materials, which meet Form R reporting thresholds are so, reported each year.

1.7.4 Hazardous Waste Generation and Disposal - as administered by the local CUPA (Certified Unified Program Agency) on behalf of the California Environmental Protection Agency, and the federal EPA. The site is registered as an EPA hazardous waste generator and is subject to provisions of the Code of Federal Regulations, the California Code of Regulations, and the California Health & Safety Code. All hazardous wastes are evaluated for characteristic(s) or classification, stored according to state and federal requirements, and manifested for off-site disposal and/or recycling. Annual state Generator fees are calculated from detailed facility records and paid accordingly.

Biennial Hazardous Waste Reports (EPA) are filed by the facility in even numbered years for odd years' activity. Such reports are forwarded, as required by law, to the California Environmental Protection Agency, Department of Toxic Substances Control.

1.7.5 Toxic Gases - pursuant to the Santa Clara County (model) Toxic Gas Ordinance. Physical facilities and gas conveyances are subject to approval prior to installation at the site. All storage, piping and detection systems are subject to local ordinance requirements as well as the building and fire codes. In addition to continuous in-house monitoring, outside regulatory inspections are performed at least annually.

1.7.6 Personnel Training - pursuant to local, state and federal requirements for the awareness and protection of WJ's employees in the performance of their various duties relative to their potential exposure to hazardous materials. Training includes, but may not be limited to, familiarity with the Company's Environmental Compliance Plan, fire safety



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and the proper use of extinguishers, the Hazard Communication Standard, hazardous waste container management and regulatory compliance, stormwater runoff pollution prevention, conservation and hazardous waste minimization, etc.

1.8 ENVIRONMENTAL COMPLIANCE AUDITS

1.8.1 Internal Audits

The following routine and periodic internal audits are typically performed (as appropriate):

(a)	Chemical Storage Bunkers	Daily
(b)	Gas Cylinder Storage	Daily
(c)	Wastewater Treatment System	Daily
(d)	ERT Response Cart(s)	Monthly
(e)	SCBA's	Monthly
(f)	Emergency Eye Wash Stations	Monthly
(g)	Fire Extinguishers	Monthly
(h)	Emergency Lighting	Monthly
(i)	Toxic Gas Monitoring System	Continuous (leak)
(j)	Below Grade (UGT) Storage Tanks	Continuous (leak)/Daily visual
(k)	Special Audits	As needed

1.8.2 External Audits

As indicated above, WJ is subject to environmental audits from various regulatory agencies. The Manager of Environmental Health and Safety maintains copies of any such audits, including responses and/or corrective action reports.

1.8.3 Chemical Spill/Gas Release Reports

A formal report is completed for any and all recordable and/or reportable spill or release of hazardous materials, even if the spill/release does not threaten to exceed secondary or emergency containment. The responsible employee or supervisor in the area of the event shall initiate the report prior to completion of his or her work shift. Outside regulatory agency notification occurs if the chemical: (a) threatens or in fact is released to the environment; or (b) exceeds the facility's ability to perform a safe and complete clean up within one (1)-working shift.

1.8.4 Citizen Complaints

Should any outside citizen complain of an actual or perceived environmental issue, it shall be fully investigated by WJ as soon as possible. If necessary, appropriate and timely corrective actions shall be undertaken by WJ to ensure the safety and welfare of the public, its employees, and the environment. Communication and follow up with outside individuals and agencies regarding any such complaint shall be under the purview of the responsible person and WJ Management.⁷



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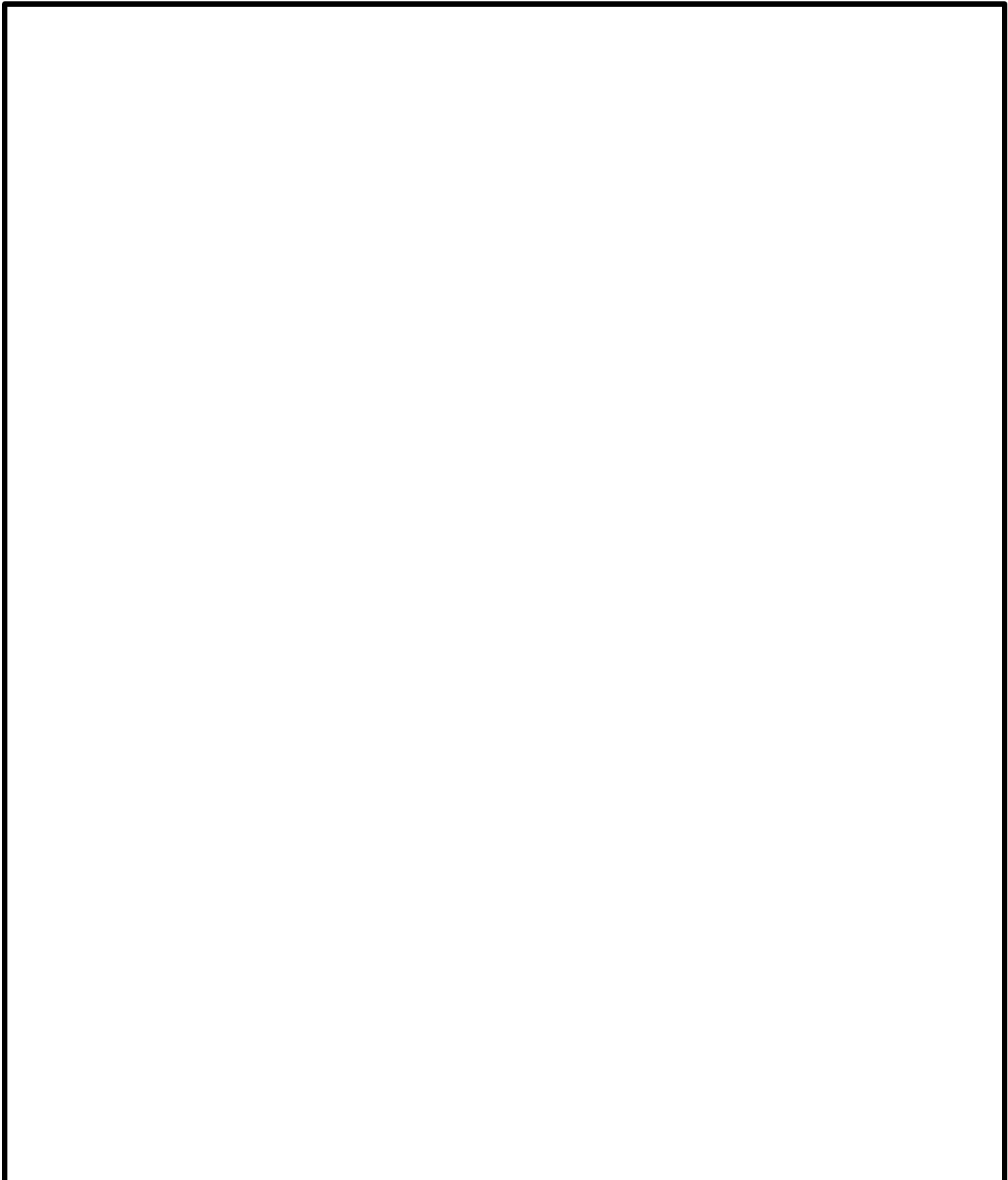
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