PURPOSE

The purpose of this plan is to control all potential negative environmental impacts as well as comply with all relevant laws associated with pollution control, waste management and environmental quality.

1. COMPANY RESPONSIBILITIES
2. Establish environmental protection policies based on regulatory requirements, customer needs and community expectations.
3. Insure employees are aware of environmental concerns, actions and responsibilities relating to our activities and promote an understanding of the business value of ecologically sustainable operation, through training and communications.
4. Design processes that reduce or eliminate waste that may environmentally damage land, air, or water.
5. Design processes that reuse or recycle waste materials as opposed to treatment and/or disposal of such wastes.
6. Select materials and/or products to use in processing, when possible, that are environmentally friendly.
7. Assess the environmental condition of property and appropriately address possible environmental impacts caused by our operations, if any.
8. MANAGEMENT RESPONSIBILITIES
9. Establish and maintain operations that support the integration of environmental factors into the Company’s daily business.
10. Ensure compliance with all state and federal guidelines concerning Company operations.
11. Review verbally with work crews any job task that has known or potential negative environmental impacts prior to work commencement.
12. SAFETY DEPARTMENT RESPONSIBILITIES
13. Develop and implement all training as related to General Safety.
14. Conduct & document internal and job-site environmental audits.
15. Ensure compliance with all state and federal guidelines concerning emergency procedures.
16. Communicate all updates or revisions to the entire workforce through safety meetings and annual safety training.
17. The HSE Manager shall be the designated environmental manager and the person to whom environmental concerns should be directed.
18. EMPLOYEE RESPONSIBILITIES
19. Acquire all information from the Supervisor and/or Site Representative pertaining to proper disposal procedures, wash water runoff and containment, spill containment, and other essential components to contamination prevention.
20. Evaluate tasks prior to initiation (including opening valves and loosening bolts), and take into account those elements involving emissions, inspections of seals and connections, vapor return and other environmental controls.
21. Report promptly to the site supervisor, evidence of oil sheen on water, spills and accidental releases.
22. Attain a basic awareness and understanding of the possible impact of the Company’s operations on the environment at all times while the activity is being conducted, from start to finish.
23. Assist, in any way feasible, remediation of environmental incidents concerning a Company operation.
24. Participate in Company and customer mandated programs for the purpose of achieving environmental excellence, such as recycling and waste management programs.
25. Properly dispose of oil rags.
26. Avoid bringing butane lighters and/or plastic bags to offshore locations.
27. INCIDENT PREVENTION
28. All considerable preventive measures will be discussed during the pre-job meeting; viable methods shall be documented on the JSA and implemented prior to job start.
29. Measures shall include but not be limited to:
30. Precautions necessary to prevent exposure and/or contamination,
31. Proper containment measures,
32. Proper waste disposal and recycling procedures,
33. Awareness of site-specific chemical and processes essential in avoiding fires, chemical emissions, leaks or spills, and
34. Review of appropriate MSDS or product information data.
35. SUCCESSFUL JOB COMPLETION

For the purpose of this policy, the Company will consider a job as being successfully completed when all facets of the job have been administered, to include:

1. Visually performing and documenting a Job Safety & Environmental Analysis and assigning site specific functions,
2. Setting up the job,
3. Performing the job,
4. Reviewing the end result of the task with customer representative,
5. De-mobilizing the job, and
6. Returning to the shop without incident.
7. WASTE MINIMIZATION PLAN
8. The Company shall estimate the waste that will be generated prior to work being performed so that the need for containers and waste removal, if necessary, can be determined.
9. The Company will coordinate with the client representative to ensure proper disposal of wastes or scrap materials. The Company’s onsite Supervisor will ensure that the client representative is aware of whether wastes and scrap materials will be taken off site by the Company or will be disposed of by the client.
10. To ensure proper disposal or reuse, the Company has assigned the responsibility for proper waste or scrap materials to the onsite Supervisor. The Company’s onsite Supervisor shall identify locations at each facility where waste products are to be stored or diverted. Proper labeling shall accompany all containers of waste, which require special handling.
11. Company personnel will dispose of aluminum cans and other recyclable items in proper containers.
12. STORAGE & DISPOSAL METHODS
13. The Company will provide training to all employees regarding practices related to the immediate storage and handling of waste, scrap or leftover materials. When PPE or other precautions are necessary to handle waste, these shall be identified during the Job Safety Analysis prior to handling any waste materials.
14. Waste materials shall be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.
15. The Company shall ensure that any project related wastes are stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employee. The Company will provide proper waste receptacles at all Company facilities for trash and materials that may be reused or recycled during a project.
16. All Company employees shall be instructed on the proper disposal method of wastes. This will include general instruction on disposal of non-hazardous wastes, trash or scrap materials. If wastes generated are classified as hazardous, employees shall be trained to ensure proper disposal.
17. The Company shall encourage proper segregation of waste materials to ensure opportunities for reuse or recycling. Company facilities will use a licensed third-party vendor for recycling any hazardous materials.
18. Employees must adhere to Storm Water Discharge requirements during cleaning activities and utilize absorbent pads or booms to contain visible oil-based residue prior to its entering the public drain system. Any spent absorbent material will be placed in a plastic liner, inside a container separate from ordinary trash.
19. Customer guidelines may vary from site-to-site; therefore employees are instructed to adhere to Customer Site Specifications as discussed in Site Specific Orientations. Employees are also encouraged to ask questions, if they are uncertain about proper disposal methods and containment.
20. INCIDENT RESPONSE
21. Emergency response telephone numbers and alarm codes shall be documented and reviewed with the entire crew prior to job commencement.
22. All personnel are instructed to follow local protocol and/or customer specifications when reporting an environmental incident and shall report immediately. Employees are never to put themselves at risk and shall not exceed the level of their training or expertise.
23. For the purpose of this policy, proper notification is as follows:
* Activate emergency alarm or effect notification to surrounding personnel.
* Notify the facility safety representative or on-site supervisor.
* Notify the Company representative.
* The Company will notify the state or federal agency as required.
1. The Company will provide absorbent pads and protective equipment as needed.
2. EMPLOYEE & SUPERVISOR TRAINING

The Company will provide training to employees within the first thirty days of employment to include at a minimum:

* Recognizing conditions of potential environmental damage.
* Proper disposal of oily rags and filters.
* Proper reporting requirements.
* Personal protective equipment.
* Review applicable definitions pertaining to environmental responsibility.

|  |
| --- |
| **Reviewed and Approved** |
| Quality Manager or President |   |   |
|   | Date |