



Environmental Program 2022

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Dear Associate:

We take a proactive approach to environmental management, demonstrated in part by this comprehensive environmental program. Environmental Management is not complete without a strong commitment to sustainability, and we also make that commitment for our company and through the services we provide. We welcome and need your ownership.

Program Vision

The company aspires to be our industry's leader in environmental and sustainability excellence – a responsible neighbor, safeguarding the environment for future generations.

Mission

Stewards of the environment in the communities where we live and work – protecting the environment, responsibly using resources, sustainably sourcing work, conducting environmentally reliable work and world-class services to help customers with their efficiency and sustainability initiatives.

Overall Program Goals

- Commit necessary resources to comply with all applicable environmental laws, regulations, permits and agreements to which we subscribe — both at company and customer sites – so we can live up to our values.
- Reduce or eliminate air, water, and land environmental risks by investing in and improving operating practices, engineering initiatives, technology advancements, and emergency preparedness procedures to prevent harmful emissions and releases.
- Participate in recycling, recovery, and reuse of residual materials and minimize the use of hazardous materials.
- Provide industry leading environmental services and solutions that ensure customer goals are met or exceeded and invest in customer and community initiatives.
- Routinely evaluate basic compliance with applicable environmental laws and regulations, striving for continual improvement.

Expectations

- Follow laws, regulations, this program, policies, procedures, and best practices to protect the environment.
- Implement and maintain the company's Environmental Program.
- Train and involve staff regarding responsible environmental stewardship.
- Set and meet clear objectives and feasible goals which lead to continuous improvement.
- Evaluate the environmental impacts of projects or activities, ensuring appropriate measures to minimize risk.
- Measure environmental performance using audits and inspection to verify progress.
- Invest in technology and innovation to improve environmental performance for us and our customers.
- Establish and verify applicable environmental criteria for suppliers and contractors.

We will comply with applicable federal, state, and local environmental regulations as well as customer mandates to maintain standards that equal or exceed industry environmental practices. We know programs, systems and performance are only as good as the people on the team; we would like to thank associates – past, present, and future – for their hard work and dedication. Thanks for being committed to our teammates, families, customers and the company.



Jared L. Black
President



Monte R. Black
CEO



Core Program

I. Introduction.

Our Environmental Program is focused on sustainable environmental stewardship, for the company and in the services we provide customers. Each employee has a responsibility to know and execute this program – commitment and ownership.

We are committed to being a good neighbor, in the United States and Canada, which means we respect and honor our role as a steward of our environment. Environmental law, regulation, and best practices differ between federal, state/provincial, and local jurisdictions, which means our program is flexible to meet the requirements presented.

Our customers also have requirements that we must meet. If this program, company policies, customer policies, or local practice present a conflict or contradiction, raise the issue for resolution. We typically apply the most stringent rule and work to follow that, but company leaders will lead resolution of environmental questions like they do in the areas of quality, performance, and safety.

Sustainability is central to everything we do, and responsible management of our natural resources is critical to a cleaner environment, the quality of life in the communities where we serve customers, and the company's long-term business success.

The company's mission and values align with environmental goals. We believe in relationships, safety, innovation, and service. Apply those principles to the environmental impacts of what we do – good relationships with environmental officials, application of environmental principles on par with safety, innovate to use resources responsibly (and save on costs), and serve our communities. As for our values, we believe stewardship is at home with long-term commitment, professionalism, continuous improvement, and more.

We all want to pass on responsible practices and habits that support clean air, water, and land to our children and their children.

II. Philosophy & Awareness.

The leadership team is committed to this Program and is ultimately responsible for all outcomes. Senior leaders own their team's commitment and outcomes while all leaders believe we should and can live up to the intent of this program. Our accountable leaders actively build trust, allowing managers, first-line leaders, and employees to take actions that maintain and improve work environments. We invest in people, systems (e.g. Intalex), engineering, equipment, opportunities, time, and more, and we are dedicated to sustaining improvements. Our success rests on the following:

1. Trained, engaged people working responsibly and sustainably, continuously improving.
2. Standards, procedures, and best practices guiding our work at all levels.
3. Responsibility and accountability of operations leaders – environmental professionals.
4. Environmental protection/sustainability as a condition of employment: every incident is preventable.
5. STOP WORK as an expectation for all environmental concerns.
6. If an environmental incident occurs, successful management of the incident by all involved, including learning from root cause analysis through implementation of lasting corrective actions.

III. Roles and Responsibilities.

Presidents:

1. Set and commit to the vision, program and goals, while engaging executives to drive results.
2. Set and enforce company standards.
3. Provide resources to establish, implement, maintain, and improve the Environmental Program including human resources and specialized skills, organizational infrastructure, technology, and financial resources.
4. Set and routinely review environmental initiatives, metrics, and goals.
5. Chair Executive SHE committee, and support business unit committees.

General Managers:

1. Own business unit environmental and sustainability goals, activities, and performance, while engaging managers to drive results.
2. Enforce company standards and set conditions for sustainable work, specifically:
 - a. Approve Environmental Objectives and Targets.
 - b. Review the Environmental Program at planned intervals to ensure its continuing suitability, adequacy, and effectiveness.
 - c. Assess the need for changes to the Environmental Program including the Environmental Policy and Environmental Objectives and Targets.
3. Chair business unit SHE committee and be an active member of the Executive Safety Committee.

Director of the Safety and Training Department:

1. Serve as executive representative to ensure the Environmental Program is up to date, implemented and maintained in accordance with government requirements.
2. Report to President and Executive team on performance of the Environmental Program for review, including recommendations for improvement.
3. Advise and aid company leaders in executing Environmental Program requirements.
4. Ensure employees are familiar with the Environmental Program.
5. Support employee training to perform work that include a significant environmental aspect.
6. Manage support systems (e.g. Safety Management System) and related compliance systems.
7. Support customer and contractor management database compliance activities.
8. Assist in research of new standards or work tasks that require additional resources.
9. Ensure the maintenance of accurate files and records to support compliance.
10. Review, act on and report data and conduct analysis to drive programs and results.
11. Communicate and ensure compliance with federal, state, and local agencies.
12. Maintain required environmental records (e.g. hazardous waste manifests).
13. Active member of the Executive SHE Committee.

Director of the Engineering and Maintenance Department:

1. Advise and aid company leaders in executing Environmental Program requirements.
2. Ensure equipment, including what we build, is safe and environmentally sound and continually being improved upon to being made safer.
3. Verify sustainable procurement activities and results.
4. Audit and continuously improve preventive and unscheduled maintenance programs to ensure safe vehicles and equipment.
5. Support the company by providing comprehensive technical guidance and training.
6. Develop approaches, procedures and/or equipment to mitigate or eliminate environmental hazards.
7. Active member of the Executive SHE Committee.

General Counsel:

1. Lead litigation efforts and support communication with federal, state, and local agencies.
2. Assist in legal and interested party reviews of significant environmental aspects.
3. Ensure contractual and other agreements are clear, appropriate and understood.
4. Manage claims by working with outside parties and insurance adjusters.
5. Support environmental incident investigations from a regulatory and compliance perspective.
6. Active member of the Executive SHE Committee.

Managers and First Line Leaders:

1. Own Environmental/Sustainability goals, activities and work, engaging people to drive results.
2. Notify teams when any changes in process, material or equipment that affects an existing environmental factor or potentially creates a new environmental factor that requires management.
3. Coordinate environmental training needed (hazcomm/chemical handling, waste management, etc.).
4. Ensure position descriptions include required environmental management system requirements.
5. Assign properly trained employees to work activities that include a significant environmental aspect.
6. Execute and enforce standards and set conditions for risk free and compliant work, specifically:
 - a. Execute procedures to meet standards and policy.
 - b. Identify and manage risk, mitigating or removing hazards and encouraging STOP WORK.
 - c. Provide input for and follow-up on team and committee meeting activities and initiatives.
 - d. Conduct and record audits, verifying standards or leading corrective actions/best practices.
 - e. Report and thoroughly investigate (or ensure investigation of) and manage relevant shortfalls.
 - f. Manage incidents, start to finish, with appropriate actions to improve and share best practices.
 - g. Execute environmental initiatives that enhance sustainability, reporting reuse and reduction.
 - h. Create and support safe, healthful, and sustainable workplaces.
 - i. Comply with applicable federal, state, and local regulations, as well as customer mandates.
7. Chair and/or support local teams or committees and actively support business unit committees.

Facility Managers:

1. Develop facility-specific work instructions for work that involves a significant environmental aspect.
2. Assign properly trained personnel to work activities that include a significant environmental aspect.
3. Ensure contractors meet criteria and perform work within our environmental guidelines.
4. Generate, maintain, and submit government required records, reports, and permits.
5. Perform/document environmental protection system tests (fire safety, wastewater treatment, etc.).
6. Obtain/maintain required permits & chemical inventory, ensuring proper filing and updates.

Safety, Health and Environmental (SHE) Professionals and Sub-Program Coordinators:

1. Know, follow and enforce company/customer environmental & sustainability policies/procedures.
2. Implement/maintain environmental and sustainability standards in accordance with this program.
3. Develop, maintain, and/or update the following documents (if applicable) and other appropriate company environmental procedures or work instructions:
 - Spill Prevention Plan
 - Waste Management Plan
 - Hazardous Materials Management Plan
 - Fire Safety Management Plan
4. Develop and provide or coordinate for appropriate environmental training.
5. Implement/maintain programs to achieve and track Environmental Target and Objective progress.
6. Conduct, file and act on environmental regulatory inspections and investigations.
7. Maintain/review corrective actions, tracking completion in the Safety Management System (Intelex).
8. Assess jobs, projects, and activities for potential environmental impact.

9. Periodically evaluate the company's compliance with applicable environmental legal requirements.
10. Serve as emergency response support for hazardous material spills and releases.
11. Be the local expert on safety management systems (e.g. Intalex) and related reporting.
12. Active member and/or supportive of local safety, health, and environmental committees.

All Employees:

1. Know, understand, and comply with environmental rules and regulations applicable to the job.
2. Do the right thing – no shortcuts that violate environmental steps or damage the environment.
3. Support sustainability efforts at your job site.
4. Promptly, clearly, and accurately report all incidents or near misses to supervision.
5. Implement best practices/lessons learned to improve environmental performance/mitigate risks.
6. Actively participate in job briefings and environmental reviews.
7. Be fully aware of the environmental aspects and impacts associated with the job, potential exposures, work procedures and controls, and roles and responsibilities.

IV. Environmental Program.

Protecting our air, land, and water and being trusted to do so by our neighbors is critical to the future of our company, families, communities and customers – it directly affects our relationships and services. We need customers and partners to trust us to be environmentally responsible and dependable. Six core stewardship pillars guide our work:

- **Reduce consumption** – Use all resources and material carefully by increasing the efficiency of operations, facilities and buildings and minimizing our environmental impact.
- **Energy efficiency** – Prioritize the use of locally available energy sources and reduce dependence on non-renewable energy and fuels as a major effort to reduce consumption.
- **Rethink waste** – Minimize waste output, maximize diversion, and transform operations from linear waste disposal to circular resource management that includes recycling.
- **Enhance the environment** – Develop and implement all projects so that they minimize environmental impacts and enhance the natural environment wherever possible.
- **Protect the environment** – Eliminate the disposal of toxins and other pollutants into our environment, including greenhouse gases, and seek sustainable alternatives.
- **Partnership** – Use suppliers, vendors, and contractors that meet industry standards for sustainability and partner with communities and customers to improve our contributions.

Our six pillars apply and exist in these three domains:

Air. In the area of environmental protection, air quality is determined by the amount of unwanted, potentially harmful components in our atmosphere. Having clean air to breathe, something most of us take for granted, is fundamental. Air, and the quality of the air, can either support or detract from human and environmental health. What is frequently referred to as air pollution, comes in many different forms and from many different sources. Pollution caused by human activities is of great concern. Our activities release a range of harmful substances into the atmosphere. In turn, many of these pollutants return to the land and water through precipitation and run-off. Reduced air quality can cause a wide range of health effects, for children, the elderly, and people with respiratory or cardiovascular problems. On a global level, many air pollutants are known to contribute to climate change. Clearly, air quality affects people and other living things, making it a fundamental aspect of environmental health. The sub-programs in this document outline our approaches to protect our air.

Land. In the area of land protection, the amount of unwanted and potentially harmful waste is multiplying consistently in both the natural environment and landfills. Our lands provide environments for farm production, but they are also vital for environmental management, including functions for greenhouse gases, recycling of nutrients, filtering of pollutants, and transmission and purification of water. Standards and policies guide the management of land activities, helping to prevent negative environmental impacts from developing, improperly managed work near watercourses, improper chemical storage, inadequate waste disposal and so on. The sub-programs in this document outline our approaches to protect our land.

Water. Water is another precious resource. A safe supply of drinking water is essential to our health. We also depend on a reliable supply of water in our households, institutions, businesses, and industries. From an environmental protection standpoint, water quality is determined by chemical, biological, and physical components. When precipitation falls to earth, a percentage of the water evaporates into the atmosphere with some being taken up by soil and vegetation while another portion flows overland as runoff into streams, lakes, and rivers (surface water). Some precipitation makes its way down through the earth to be stored underground in aquifers that we can access using wells. While there is a variety of naturally occurring elements or substances that affect water quality, such as arsenic and bacteria, human activity has a significant impact on water quality. Many activities have the potential to pollute or contaminate drinking water and the water upon which aquatic life depends. If we are to benefit from and enjoy safe and reliable water supplies for generations to come, we must correct past practices and strategically address future activities to ensure minimal negative impact. The sub-programs in this document outline our approaches to protect our water.

Environmental Key Performance Indicators. In our program, we measure performance to drive action:

Topic	Measure
Resources	Environmental Program resourced
Reduce consumption	Set/meet 3 annual consumption reduction initiatives <ul style="list-style-type: none"> Paperless Initiative: 40% reduction goal Clean water use reduction
Energy efficiency	Reduce facility, vehicle, & equipment energy use: <ul style="list-style-type: none"> Fuel Savings Initiative: 3% reduction Electricity Reduction Initiative: 3% reduction
Rethink waste	All facilities participate in local recycling programs and follow universal waste procedures <ul style="list-style-type: none"> Zero Landfill Initiative Recycling Initiative
Enhance the environment	90% of all projects have an environmental assessment and all applicable processes have a permit/license
Protect the environment	Zero recordable environmental incidents and hazardous substance reduction initiative
Partnership	The company accepts/participates in community/customer environmental program invitations
Audit & Inspect	Company audit and inspection program executed

Policies and Procedures. Policies and procedures comply with applicable federal, state, and local regulations as well as customer mandates to maintain standards that equal or exceed industry best practices. They have been developed to consider not only systems and processes, but also people and culture. Employees are expected to follow and help improve policies and procedures.

- *Policies* guide actions and inform employees. They are part of our culture and systems, often disseminated through training and experience. They are available electronically on our SharePoint site, as well as via hard copy when requested. Computer kiosks are provided at many locations for employees to access policies and other company information.
- *Procedures* are written and posted on SharePoint and/or other internal file sharing platforms, then communicated by business leaders through instructor-led, virtual, and on-the-job training. They are primarily developed by business subject matter experts to address site and task specific requirements.

V. Recognition.

The company is committed to competing for environmental recognition among our customer base and with external organizations.

The company also presents an annual award – Environmental Stewardship Award – to the employee(s) with the most innovative and effective environmentally-focused initiative, program, and/or actions in a calendar year.

Annually, the company will also report on the economic benefits of environmentally-focused actions to highlight the practical, cost-saving components of responsible choices and stewardship. We will recognize and celebrate that this program is beneficial for individuals, our teams, the business, and our communities.

VI. Acknowledgement Agreement. We will endure as the best industrial services provider only if we maintain, improve, and sustain our programs, our positive and solution-oriented approach, and our prioritized safety, health, and environmental climate and culture. To encourage ownership, we remind all employees of their commitment to the program by including the acknowledgment agreement below.



Acknowledgment Agreement

VI. Acknowledgment Agreement.

Commitment to Safety, Health and Environmental Excellence

I certify I reviewed the program and I am aware of my roles and responsibilities.
I agree to be safe at my work (and at home), healthy in my choices and environmentally responsible.

Please review and write initials next to each statement

I must learn and follow SHE policies and procedures as a condition of employment. When at a customer site I will also comply with their safety, health and environmental programs – with more stringent procedures taking precedent.

I will comply with all applicable federal, state and local safety, health and environmental regulations and maintain occupational health and safety standards that equal or exceed industry best practices.

I understand it is my responsibility to ensure my full understanding of all potential work hazards and exercise my “STOP WORK” authority for any task that violates our SHE program.

I understand it is my responsibility to be current with assigned training and to seek additional training when my skills and/or confidence leave me with doubt in my ability to safely perform work.

I understand personal protective equipment (PPE) such as hard hats, safety glasses, hearing protection and gloves are required and I accept responsibility for proper inspection, use and care of all PPE.

I understand some work activities are physically strenuous and that I am responsible for communicating to MPW leadership any instance where I believe I am not fit for duty or able to work safely.

I must immediately report any near miss or work incident to my supervisor/manager.

I have the right to request and receive appropriate medical treatment and I will inform my supervisor/ manager of my desire to seek medical treatment before treatment is administered.

I understand it is my responsibility to actively contribute to SHE excellence and I will exhibit that commitment by carrying my Safety Coin or wearing my Safety Pin while at work.

I will submit at least one meaningful safety observation with action taken monthly.

**My signature and dates below signify my understanding of these responsibilities
and my commitment to MPW and customer safety, health and environmental standards.**

Name:

Date:



Sub-Programs

VII. Sub-Programs.

Sub-programs are individual and distinct categories within our larger program. A single sub-program may be addressed by one or several policies and/or procedures, but this summation of our sub-programs is intended to provide the information needed to holistically understand our commitment and program.

We ensure customer training and other requirements are met prior to starting work. If our programs, sub-programs, processes, policies, procedures, or forms come into conflict with customer requirements, we consult with customers to resolve the issues.

Customer programs and policies will be followed. We will also address concerns on customer sites, regardless of who is involved, because we are part of the customer's team.

All material is reviewed annually and when standards or best practices change.

Sub-Programs	
1. Aerosol Can Management	2. Air Permitting
3. Chemical Control and Management	4. Containments
5. Energy	6. Fugitive Dust
7. Hazardous Material and Waste	8. Maintaining Mobile Equipment
9. Migratory Birds	10. Recycling
11. SPCC	12. Spills
13. Storage Tanks	14. Stormwater
15. Sustainable Procurement	16. Universal Waste
17. Used Oil	18. Vehicle Washing
19. Waste Minimization	20. Wastewater
21. Wildlife Management	

Executive Summary:	The Aerosol Can Management Sub-Program governs use of a variety of products (cleaners, paints, etc.) that come in aerosol cans (spray cans). Aerosol cans contain both the product and a pressurized propellant. In most cases, these products may have hazardous characteristics, such as ignitability (e.g. paints, lubricants) or toxicity (e.g. chlorinated cleaning products). In addition, most propellants are mixtures of ignitable gases, such as propane and butane. For these reasons and more, these cans must be properly handled, stored, and managed. Leaders at locations across the company that generate larger quantities of aerosol cans must maintain a disposal tote, and they must verify Universal (or other) waste disposal requirements are met. The contents of receptacles that cans are emptied into will be characterized and disposed of properly, depending on receptacle contents. No pesticide cans may be punctured or disposed of in regular trash.
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals
Administrator Duties:	Administrators ensure the requirements of the Aerosol Can Management Sub-program and environmental standards are met at each worksite and facility, including proper disposal and if needed return to the distributor. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelix – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Chemical inventories account for aerosol can contents and local process/SOP accounts for aerosol can handling, storage, use, and disposal IAW local regulations and PR-HS-159.1: Aerosol Can Management.
Training:	All employees are assigned and must complete required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews, and more. Site EAPs contain guidance on spill response, if necessary. Site managers are responsible ensuring customer-specific environmental procedures are reviewed and followed.
Resource Allocation:	Resources invested include appropriate cabinets and receptacles, spill kits, PPE, the development of training materials and company LMS, the Safety Management System (Intelix), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.1 Aerosol Can Management has detailed instructions and guidance on this topic. In the U.S., Title 40, Code of Federal Regulations (CFR), Part 273 provides the basis for this policy, procedure, and sub-program with EPA and state environmental laws and regulations.

Executive Summary:	<p>The Air Permitting Sub-program is a necessary responsible business practice – many activities and processes require authorization from local, state, and/or federal authorities. When either an Environmental Agency or a local authority provides an environmental permit, they are allowing a company to carry out an activity with certain conditions. The permit gives clear instructions on how the environment must be protected, and it may regulate how the activity or process is performed. The standards of protection account for the nature of the hazard and costs or risks to the environment and health.</p> <p>These permits maintain a careful balance between human activity and environmental protection. An air permit can affect many facets of an activity or process including types of products the company can use, placement of process equipment, hours of operation, and implementation of control devices required to meet minimum standards. Air permits can have a large impact on a company, and it is important to properly evaluate air permitting needs to improve compliance and protection.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals
Administrator Duties:	Administrators ensure the requirements of the Air Permitting Sub-program and environmental standards are met at each worksite and facility, including if a permit is needed (research, submit, and establish and maintain permits). Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place, level of compliance, and report status. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	The permit and documentation to secure the permit are maintained in our digital filing system IAW PR-HS-159.2: Air Permitting and FRM-HS-159.1: Air Requirements Checklist to meet detailed guidance for managing Air Permits.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews, and directions. Site managers are responsible ensuring customer-specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include consulting/permitting costs, air systems, development of training materials and company LMS, the Safety Management System (Intelex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.2: Air Permitting and the supporting form FRM-HS-159.1: Air Requirements Checklist contain detailed instructions and guidance on the topic. In the U.S., the Clean Air Act (CAA) Standards (EPA) provide the basis for this policy, procedure, and sub-program.

Executive Summary:	<p>The Chemical Control & Management Sub-program addresses the processes and resources necessary to manage chemical inventory to increase safety, save money, reduce waste, improve sustainability, improve hazard communication, speed up emergency response, and help prevent incidents. This includes procurement, storage, handling, use, cleanup, and disposal. Chemicals pose a wide range of hazards, including fires, explosions, leaks, accidental releases, and adverse health effects. Effective chemical management helps identify potentially toxic or harmful substances.</p> <p>This information is needed to prevent accidents and injuries, as well as identify safer alternatives to frequently used chemicals. Keeping track of chemical inventory is an easy first step to cut unnecessary spending and reduce hazards. Many chemicals are perishable, meaning unused inventory expires and/or becomes unstable. In the event of an emergency, a chemical inventory is crucial in planning and emergency response to ensure the correct spill control materials and equipment are used.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals
Administrator Duties:	Administrators ensure the requirements of the Chemical Control & Management Sub-program and environmental standards are met at each worksite and facility, including establishing a comprehensive chemical inventory, and completing chemical reviews to determine if the chemical purchase is necessary. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance with annual chemical inventory reports. Incidents are reported in and investigated using our Safety Management System – Intellex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	The inventory itself and all associated information (including SDS) must be maintained IAW standards and policy PO-HS-116: Hazard Communication Program which includes detailed guidance on proper procedures for controlling/managing chemicals.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews, and directions. Site managers are responsible ensuring customer-specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include equipment associated with handling and storage, the development of training materials and company LMS, the Safety Management System (Intellex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-116: Hazard Communication Program contains detailed instructions and guidance on this topic. In the U.S., 29 CFR 1910.1200 - Hazard Communication provides the basis for policies and this sub-program.

Executive Summary: The Containments Sub-program ensures employees are aware of containment hazards and their use. Hazardous materials and substances operations and handling require diligence to prevent spills, overflow, or leaks as well as protocols and physical measures to prevent and control unexpected spills and leaks. One of the standard physical measures to contain spilled hazardous substances is the use of secondary containment. Chemical waste can be hazardous which may cause serious injury if it touches the skin. Moreover, spills can cause environmental issues in waterways (kill marine life, contaminate water, and cause long-term damage).

Secondary containments are a line of defense that prevent spills or leaks from becoming a serious incident, and they are an added layer of protection for people managing hazardous substances to prevent direct contact. The EPA and the Occupational Safety and Health Standards Act (OSHA) require secondary containment, and the company has established spill response plans so, if there is a breach, we have a plan to remediate the spill.

Administrator(s): Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals

Administrator Duties: Administrators ensure the requirements of the Containments Sub-program and environmental standards are met at each worksite and facility, including establishing when and where secondary containments are required, establishing spill plans, and inspecting the containments regularly to ensure reliability. Coordinate with Corporate Safety and Training Department to improve programs and policies.

Reporting: Leaders report processes are in place, EAP status, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.

Documentation: Chemical inventories and facility inspections must be documented. The procedure PR-HS-159.3: Containments also includes detailed guidance on the proper procedures for when and where containments are necessary.

Training: All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer-specific environmental procedures are reviewed.

Resource Allocation: Resources invested include the purchase of containment items and the development of training materials and company LMS, the Safety Management System (Intelex), this Program, and all supporting policies and procedures.

Guiding Documents: Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.3: Containments contains instructions and guidance on the topic. In the U.S., standards in 40 CFR §112.7 provide the basis for this policy, procedure, and sub-program.

Executive Summary:	<p>The Energy Sub-program ensures employees are aware of their energy use and their roll in the conservation of energy and managers are measuring and leading initiatives to reduce fuel, electric, and gas consumption across the company and at customer locations. Some examples include investment in renewable energy technology, like solar, upgrading facilities to high-efficiency lighting, using technology for meetings to reduce travel, and the use of technologies and process that encourage reduce, reuse, and recycling like, oil waste burners for waste to energy solutions and telematics to measure fuel use and engine idle.</p> <p>The company measures and seeks to reduce all forms of energy consumption. From the use of super-single tires to reduce fuel consumption, to upgrading the corporate fleet to more fuel-efficient vehicles, the company is changing for and investing in environmental principals. This is in part proven by our EPA SmartWay partnership, but more investment, continuous improvement, and practical demonstrations of our commitment are needed.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals
Administrator Duties:	Administrators ensure the requirements of the Energy Sub-program and energy-consumption standards are met at each worksite and facility, including establishing measures and tracking reduction and use. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place, reduction goals and progress, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Energy consumption, by facility and group, must be documented and proof retained energy cost by type of energy (fuel, diesel, gas, electric, etc.).
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer-specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of fuel-efficient vehicles, investment in telematics to measure fuel use and engine idle, high-efficiency lighting, solar panels, and much more and the development of training materials and company LMS, the Safety Management System (Intelex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and contains instructions and guidance on the topic. The EPA's Energy Policy Act provides the basis for this policy and sub-program.

Executive Summary: The Fugitive Dust Sub-program ensures employees are aware of the hazards of and requirements for fugitive dust mitigation. These particles are comprised mainly of soil minerals (i.e. oxides of silicon, aluminum, calcium, and iron), but can also consist of sea salt, pollen, spores, etc. Some dust settles quickly and adversely affects human health or the environment. All activities have the potential to generate fugitive dust, although high levels of dust particles often originate from activities in agricultural, mining, construction, manufacturing, transportation, utilities, wholesale & retail trade, and services.

Engineering and administrative controls mitigate fugitive dust emission on company-owned property (we also assist customers with fugitive dust mitigation). Best practices to prevent and control dust include limiting the amount of exposed soil, applying water to suppress dust, vacuuming equipment to keep surfaces clean, controlling traffic speed over unpaved areas, applying gravel or paving to cover soil along roads and in storage areas, and never using compressed air or a blower of any sort to clean surfaces.

Administrator(s): Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals

Administrator Duties: Administrators ensure the requirements of the Fugitive Dust Sub-program and environmental standards are met at each worksite and facility, including establishing when and where fugitive dust mitigation is required. Coordinate with Corporate Safety and Training Department to improve programs and policies.

Reporting: Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intalex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.

Documentation: Facility managers document cleaning schedules; the correlating procedure (PR-HS-159.4: Fugitive Dust) includes detailed guidance on proper procedures for controlling and mitigating fugitive dust.

Training: All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.

Resource Allocation: Resources invested include the purchase of dust mitigation equipment, development of training materials and company LMS, the Safety Management System (Intalex), this Program, and all supporting policies and procedures.

Guiding Documents: Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.4: Fugitive Dust contains detailed instructions and guidance on the topic. In the U.S., EPA regulation 62.6 standards provide the basis for policy, procedure, and sub-program.

Executive Summary:	The Hazardous Material and Waste Sub-program ensures employees are aware of material and substances encountered that are considered hazardous; this includes shipping and transportation of regulated hazardous material and waste (HMW) across all businesses (see the company Transportation Safety Program for details). The company often supports customers in HMW work, but the company goal is to minimize or prevent the need for use of HMW on company-owned property and in company business. All HMW is evaluated to determine need and only minimal quantities are ordered, used, and stored. The company only authorizes the shipment of DoT-regulated HMW by ground and remains committed to safe, secure handling and transport of HMW (including physical safety of employees and loss prevention). We use controls, training, and emergency preparation to ensure employees are ready for HMW work. Shipments are properly marked and labeled, with contact information and best practice packaging. All HMW is properly stored and secured including in shipment, loading, use, and storage.
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals; Transportation Safety Department
Administrator Duties:	Administrators ensure the requirements of the Hazardous Materials and Waste Sub-program and environmental standards are met at or on each worksite, facility, and public roadway including setting and following HMW procedures with spill plans, emergency response steps, and appropriate placarding and trained employees. Coordinate with Corporate Safety and Training and the Transportation Safety departments to improve programs and policies.
Reporting:	Leaders report processes are in place, HMW created/moved, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intalex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	The Transportation Safety Program includes detailed guidance on procedures for the transportation of hazardous materials; managers must document site HWM.
Training:	All employees are assigned and must complete all required Hazardous Material Transportation and general driving training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible for ensuring customer environmental compliance.
Resource Allocation:	Resources invested include the purchase of signage and equipment, shipping, development of training materials and company LMS, the Safety Management System (Intalex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental and the Transportation Safety Program contain our guidelines and guidance on this topic. In the U.S., standards in 49 U.S.C. 5103 provide the basis for this policy and sub-program.

Executive Summary:	<p>The Maintaining Mobile Equipment Sub-program ensures employees are aware of the importance of maintenance, preventative maintenance, and inspections of mobile equipment. Fluids used in mobile equipment are essential for proper vehicle operations, but leaks can cause environmental and slip/trip/fall hazards. The immediate inspection of equipment when it arrives onsite and prior to each use, to check for leaks or irregularities, is imperative. Particular attention is paid to hoses, seals, fittings, tanks, and filters (areas that pose the biggest threat for leaks).</p> <p>Equipment found leaking or likely to leak is taken out of service immediately and repaired. Upon repair, equipment is thoroughly reinspected to ensure adequate repair prior to placing the equipment back into service. Preventative maintenance, repairs, and maintenance are accomplished in designated, designed areas wherever possible; where it is not possible, best practice precautions, including storm drain/waterway protection and use of drip pans or catchments, are used to prevent the potential of a spill reaching storm drains.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Director of Maintenance; Facility Managers; Company Safety, Health & Environmental Professionals
Administrator Duties:	Administrators ensure the requirements of the Maintaining Mobile Equipment Sub-program and environmental standards are met at each worksite and facility, including identifying the proper precautions to take and ways to limit the opportunities of spills or leaks from mobile equipment reaching storm drains or waterways. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intalex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document maintenance schedules; the company's Maintenance Program includes detailed guidance on proper procedures for maintaining mobile equipment.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of equipment, supplies, and materials as well as development of training materials and company LMS, the Safety Management System (Intalex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and the company's Maintenance Program contains detailed instructions and guidance on the topic.

Executive Summary:	<p>The Migratory Birds Sub-program ensures employees are aware of laws, regulations, and policies in place seeking to protect migratory, threatened, and endangered birds from harm. Over 1,000 species of birds are protected by federal law (including very common species like robins and crows). This law makes it illegal to injure, kill, or capture any protected bird. It also makes it illegal to possess any feather or part of a protected bird. Significantly, for landscaping or facilities and grounds work it is illegal to destroy an active nest.</p> <p>Nests must not be moved or disturbed if the potential exists that the nest is active or used. Company employees may encounter migratory birds on many occasions and in a variety of areas, including stack washes and hydro-excavation projects as well as in lay down areas or around equipment/vehicles that have been sitting for an extended period during the appropriate season. By investing in the training and development of our employees we ensure proper procedures to protect migratory birds, even encouraging and supporting use of company property for safe and appropriate nesting.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals
Administrator Duties:	Administrators ensure the requirements of the Migratory Bird Sub-program and environmental standards are met at each worksite and facility, including identifying the proper precautions to take and ways to protect migratory birds. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report protections are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	The correlating procedure (PR-HS-159.5: Migratory Birds) includes detailed guidance on the proper procedures for protecting migratory birds.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the development of training materials, MPW eCourses, and site-specific training. Also, there is the time to develop and communicate policy, reports, reviews, and corrective actions. Finally, there are materials needed for handling and safety.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.5: Migratory Birds contains detailed instructions and guidance on the topic. In the U.S., the Migratory Bird Treaty Act 16 U.S.C. 703-712 provides the basis for program.

Executive Summary:	<p>The Recycling Sub-program ensures the company is committed to recycling materials used every day and minimizing nonhazardous waste; it is also a commitment to reduce and reuse where possible. It is the responsibility of every employee to support these efforts to protect our environment by conserving resources and landfill space. Landfill space is a precious commodity; in some communities it is in short supply. Recycling saves valuable materials, like paper fibers and metals for reprocessing to reduce the use of virgin products.</p> <p>Recycling also reduces water and energy use (oil, coal, and gas). Our paperless initiative includes a goal to be 100% paperless by 2025 with 100% participation in recycling programs. We are also committed to recycling plastic, aluminum cans, glass, and cardboard; each company-owned and -operated facility audits recycling practices to ensure all employees are trained on what to recycle and how. Facilities have well marked and strategically placed containers throughout, emptied on a regular schedule.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; and Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Recycling Sub-program are adhered to and all facilities/employees participate in the program. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place, recycling program participation, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document recycling program contracts and costs and efforts to reduce and reuse; the correlating procedure (PR-HS-159.15: Recycling) includes detailed guidance on procedures to manage a recycling program.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the participation costs associated with recycling programs, development of training materials and company LMS, the Safety Management System (Intelex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR PR-HS-159.15: Recycling contains detailed instructions and guidance on the topic.

Executive Summary:	<p>The Spill Prevention Control and Countermeasure (SPCC) sub-program ensures managers understand and recognize requirements and commit to implementation of their plans. Oil spills endanger public health, impact drinking water, harm natural resources, and disrupt the economy. During storage, transport, or as the result of industrial activity, oil and oil-based products are sometimes spilled on land or into waterways. When this occurs, human health and environmental quality are at risk; every effort must be made to prevent spills, cleaning them up promptly if they occur. The purpose of the SPCC plan is to prevent a discharge of oil.</p> <p>These SPCC plans are needed for any facility with a total above-ground oil storage capacity of 1,320 gallons or more (excluding containers of less than 55 gallons) or a total below-ground oil storage capacity of 42,000 gallons which, due to location, could reasonably be expected to discharge oil in harmful quantities on or into land or waterways, respectively. Manager's SPCC plans must be written, maintained, implemented, rehearsed, and updated (republishing after a change or every 5 years).</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Spill Prevention Control and Countermeasure (SPCC) Sub-program and environmental standards are met at each worksite and facility, including identifying when and where SPCC plans are needed and the proper precautions to take and ways to protect spills for occurring and entering navigable waters. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place, SPCC is up to date, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document their SPCC; the correlating procedure (PR-HS-159.6: Spill Prevention Control and Countermeasure (SPCC)) includes detailed guidance on procedures for SPCC plans.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include purchasing mitigation materials/prevention systems, development of training materials and company LMS, the Safety Management System (Intelex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.6: Spill Prevention Control and Countermeasure (SPCC) contains detailed instructions and guidance on the topic. In the U.S., 40 CFR part 112 provides the basis for policy.

Executive Summary:	<p>The Spills Sub-program ensures all employees have effective instructions and information in the event of any unplanned release of hazardous material or waste to air, soil, or surface water which could threaten human health and/or the environment. It also provides guidance for accidental spills which occur on public roadways or property to ensure minimal impact to the public and natural environment. The company is committed to restoring spill sites to their previous state following an incident. Managers must assume their prevention efforts will fail, remaining prepared for a spill.</p> <p>Procedures need to be outlined in facility EAPs and local procedures, communicated to employees/long-term visitors, and trained (employees must know what to do). Each company site must have on-hand at least one large spill response kit, easily accessible from active work areas to provide for clean-up of small and medium size spills or as initial response to a large spill. Spill kits may include, but are not limited to absorbent pads, absorbent socks, drain cover, barrier tape, refuse bags, and PPE.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Spill Sub-program and environmental standards are met at each worksite and facility, including the preparation for spills and ensuring the facility has a plan in place to contain and control all potential spills. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place, EAP status, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document spill prevention procedures; the correlating procedure (PR-HS-117.2: Spill Response) includes detailed guidance on the proper procedures for protecting against spills.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of prevention and response material, development of training materials and company LMS, the Safety Management System (Intelex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-117.2: Spill Response contains detailed instructions and guidance on the topic. In the U.S., 40 CFR part 112 provides the basis for policy, procedure, and this sub-program.

Executive Summary:	<p>The Storage Tanks Sub-program ensures proper precautions are taken to ensure storage tanks are properly selected, contained, permitted, and used. Storing products and chemicals such as heating oil, diesel fuel, gasoline, acids, and bases in bulk storage containers or in tanks, whether underground or above ground, raises concerns over leaks, spills, and overfills. The selection is important because, depending on the material being stored, the tank may not be compatible with the chemical.</p> <p>A comprehensive list of all company-owned above ground and below ground tanks that have the capability of holding more than 55 gallons is managed and updated. State by state storage tank regulations differ, and the regulations are consulted by facility managers to ensure requirements are met. Containments are the last line of defense and an added layer of protection for personnel managing hazardous substances (preventing direct contact in case of a spill); the EPA and the OSHA require secondary containment. The company also has spill response plans to remediate spills.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Storage Tanks Sub-program and environmental standards are met at each worksite and facility, including the proper selection, registration, containment of tanks. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place, tank tracking, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document tanks on site, maintenance schedules, and inspections; the correlating procedure (PR-HS-159.7: Storage Tanks) includes detailed guidance on the proper procedures for managing storage tanks.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible to ensure customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of acceptable tanks and/or mitigation material, development of training materials and company LMS, the Safety Management System (Intelex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental and PR-HS-159.7: Storage Tanks contain our guidelines with detailed instructions and guidance on the topic. In the U.S., U.S. Code, Title 42, Chapter 82, Subchapter IX and 40 CFR Part 112 provides the basis for policy, procedures, and this sub-program.

Executive Summary:	The Stormwater Sub-program provides guidance on practices used to protect water quality, enhance water availability, and reduce flooding potential through effective stormwater management. Stormwater is water from rain and melting snow and ice; it can infiltrate the soil, be held on the surface to evaporate, or run off into a nearby stream, lake, river, or other water body. Prior to land development most stormwater soaked into soil or evaporated; with development, large amounts of run off is produced from roof tops, concrete, asphalt, and other impervious surfaces built to shed water. Instead of soaking into the soil and into surface water, runoff funnels through storm drainage systems into streams, lakes, rivers, and other bodies of water. Nature's infiltration, evaporation, and filtering are reduced by unnatural mass stormwater runoff. Stormwater management controls and uses runoff. It includes planning for runoff, maintaining stormwater systems, and regulating the collection, storage, and treatment of stormwater, and it considers drainage in facility design. The company is committed to smart design and compliance.
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Stormwater Sub-program and environmental standards are met at each worksite and facility, including identifying when and where a Stormwater Pollution Protection Prevention Plan (SPPP) is needed with precautions to take. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelix – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document stormwater access and controls; the correlating procedure (PR-HS-159.8: Stormwater) includes detailed guidance on the proper procedures for protecting stormwater from creating environmental hazards.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of applicable items and systems to meet regulatory requirements, development of training materials and company LMS, the Safety Management System (Intelix), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.8: Stormwater contains detailed instructions and guidance on the topic. In the U.S., EPA's National Pollutant Discharge Elimination System provides the basis for policy.

Executive Summary:	The Sustainable Procurement Sub-program provides guidance on processes, plans, programs, and practices that determine who can purchase what for the businesses. Specifically, the company has and maintains a long-term commitment to make every purchase one that is sustainably sourced, environmentally-friendly, and able to be reused or recycled when at the end of use or life-cycle. Buildings and facilities are evaluated for their efficiency and footprint, new construction is undertaken to reduce the company's impact, vehicles are purchased based on longevity and repair profiles, equipment is made or purchased to last, and more. Vendors and suppliers are evaluated and decisions are informed by our ability to determine how items were sourced and other sustainability and stewardship criteria. Finally, materials and supplies purchased are compared to determine those with the lowest sustainability profile to ensure our impacts are as low as they can be for consumables.
Administrator(s):	Presidents; General Managers; CFO; Director of Maintenance, Director, Safety and Training; Company Safety, Health, & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Sustainable Procurement Sub-program and environmental standards are met at each worksite and facility, including identifying preferred products and approaches. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intalex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	The CFO and Director of Maintenance document sustainable procurement parameters and document audits/reviews to determine progress.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of applicable items and systems to meet regulatory requirements, development of training materials and company LMS, the Safety Management System (Intalex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.8: Stormwater contains detailed instructions and guidance on the topic. In the U.S., EPA's National Pollutant Discharge Elimination System provides the basis for policy.

Executive Summary: The Universal Waste Sub-program ensures safe and compliant collection, storage, and disposal of universal waste. Universal waste is generated company-wide, handled by numerous company employees. It is a category of hazardous waste that poses low risk to human health when handled and transported safely. Due to the low risks and common products involved, the regulations pertaining to universal waste management are less stringent than those for non-universal hazardous wastes. Examples of universal waste consist of batteries, electronic devices, pesticides, lamps, and aerosol cans.

The company recognizes potential hazards associated with universal waste but is committed to disposal IAW with this sub-program and associated procedures to eliminate or significantly reduce hazards and risks. Handlers of universal wastes meet less stringent standards for storing, transporting, and collecting wastes but the wastes must comply with full hazardous waste requirements for final recycling, treatment, or disposal. This helps remove wastes from municipal landfills and incinerators, providing stronger safeguards

Administrator(s): Presidents; General Managers; Director, Safety and Training; Facility Managers; and Company Safety, Health & Environmental Professionals.

Administrator Duties: Administrators ensure the requirements of the Universal Waste Sub-program are adhered to and all universal waste is collected and disposed of properly and in accordance with regulations. Coordinate with Corporate Safety and Training Department to improve programs and policies.

Reporting: Leaders report processes are in place, universal waste tracking, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelix – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.

Documentation: Responsible managers document universal waste contracts and costs and efforts to reduce and reuse; the correlating procedure (PR-HS-159.12: Universal Waste) includes detailed guidance on procedures for how to manage universal wastes.

Training: All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.

Resource Allocation: Resources invested include the purchase of universal waste collection and handling material, development of training materials and company LMS, the Safety Management System (Intelix), this Program, and all supporting policies and procedures.

Guiding Documents: Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.12: Universal Waste contains detailed instructions and guidance on the topic. In the U.S., EPA standards under 40 CFR 273 provide the basis for policy.

Executive Summary:	The Used Oil Sub-program ensures used oil is managed to prevent adverse employee, community health, environmental issues. Disposal of used oil into wastewater streams, storm drains, or on the ground causes needless damage to resources and wastes a valuable renewable resource. Used oil is any oil refined from crude oil or any synthetic oil that has been used resulting in contamination by physical impurities (no longer usable for intended purposes). If used oil is contaminated with other chemicals or waste, it may not meet the requirements of used oil and instead may be another type of waste. When managed properly, used oil is recyclable and easily managed. Used oil must be placed in sealed containers and labeled as "Used Oil." Containers must be in good condition and free of excessive rust, dents, or structural deformities. Secondary containments are used to catch spillage or drips around the collection container. Any spills, including into secondary containment, are cleaned up immediately.
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Maintenance Managers, Facility Managers, and Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Used Oil Sub-program and environmental standards are met at each worksite and facility, including the proper procedures to store, label, contain, and ensure spill preparedness. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place, used oil tracking, and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelix – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document used oil processes and use; the correlating procedure (PR-HS-159.9: Used Oil) includes detailed guidance on the proper procedures for used oil storage and disposal.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of used oil storage and handling items, development of training materials and company LMS, the Safety Management System (Intelix), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.9: Used Oil contains detailed instructions and guidance on the topic. In the U.S., EPA Standard Part 279 – Standards for the Management of Used Oil provides the basis for policy.

Executive Summary:	<p>The Vehicle Washing Sub-program is in place to ensure water use and runoff are controlled to reduce negative or potentially hazardous situations. The average car wash uses over 100 gallons of water per vehicle, and it is common for wash water to directly enter storm drains (no treatment prior to discharge into nearby streams, lakes, rivers, and other waterways). Washing one car may appear minor, but a fleet of vehicles and equipment creates a substantial impact due to soap, detergent, residue from exhaust fumes, gasoline, heavy metal, and oil.</p> <p>Pollution associated with vehicle wash water degrades water quality and impacts aquatic habitats. The best way to minimize the effect vehicle washing is to use commercial car wash locations that recycle water and ensure water is treated prior to entering waterways. If a commercial location is not available ensure the use of biodegradable, phosphate-free, water-based cleaners and, if possible, wash vehicles/equipment on an area that absorbs water (gravel or grass) to filter the dirty water before it enters groundwater, storm drains, or waterways.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Maintenance Managers, Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure requirements of the Vehicle Washing Sub-program and environmental standards are met at each worksite and facility, including the proper procedures to responsibly wash vehicles/equipment to minimize environmental impacts. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intalex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document costs; the correlating procedure (PR-HS-159.10: Vehicle Washing) includes detailed guidance on the proper procedures.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of environmentally friendly materials and use of commercial facilities, development of training materials and company LMS, the Safety Management System (Intalex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.10: Vehicle Washing contains detailed instructions and guidance on the topic. In the U.S., EPA's Clean Water Act of 1972 provides the basis for policy.

Executive Summary:	<p>The Waste Minimization Sub-program ensures a high priority on reducing waste and pollution prevention. The company strongly encourages employees and contractors to reduce the quantity and or toxicity of chemical wastes generated by the company; benefits of waste minimization are reduced potential pollution of a chemical and reduced disposal costs. Waste minimization approaches include substitution, modification, and chemical recycling. It is important that all employees and departments generating waste consider how they can contribute to minimization.</p> <p>The goal is either prevent the formation or production of pollutants at the source or reduce the amount of waste generated. Chemical waste can be reduced substantially by substituting non-hazardous or less toxic materials in processes; for example, substituting water-based solutions for solvent-based solutions. The waste hierarchy states prevention, reduction (minimization), reuse, and recycling before disposal (disposal is the last resort after exhausting all other options). This also is intended to encourage waste minimization actions in all areas.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; Engineering Department, and Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Waste Minimization Sub-program are adhered to and that we follow minimization best practices. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intalex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document waste minimization plans and progress; the correlating procedure (PR-HS-159.11: Waste Minimization) includes detailed guidance on the proper procedures to minimize waste.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the costs of participation in local programs, development of training materials and company LMS, the Safety Management System (Intalex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.11: Waste Minimization contains detailed instructions and guidance on the topic.

Executive Summary:	<p>The Wastewater Sub-program ensures environmental requirement compliance adhering to restrictions set forth by local, state, and federal agencies. Wastewater is water that has been used for human purposes such as washing, flushing, or manufacturing and contains waste products as a result. This water must be collected, treated, and properly discharged to protect human health and the environment. In some cases, a National Pollutant Discharge Elimination System (NPDES) permit or license to discharge pollutants from point sources may be necessary.</p> <p>The NPDES permit program addresses water pollution by regulating point sources that discharge pollutants; each individual wastewater discharge to a surface water body (lake, stream, canal, ocean, or wetland area) must be covered under a site-specific NPDES permit to be in compliance with the Clean Water Act. Sometimes samples must be collected and analyzed, reporting results to appropriate regulatory agencies. Permit compliance is the responsibility of company employees</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; and Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Wastewater Sub-program are adhered to and all facilities that are required to have a wastewater discharge permit and complying with the permit and federal regulations. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intelex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document wastewater treatment procedures and protections; the correlating procedure (PR-HS-159.13: Wastewater) includes detailed guidance on the proper procedures for how to manage wastewater.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the costs associated with processing and controlling wastewater, development of training materials and company LMS, the Safety Management System (Intelex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.13: Wastewater contains detailed instructions and guidance on the topic. In the U.S., the National Pollutant Discharge Elimination System and EPA's Clean Water Act provide the basis for policy.

Executive Summary:	<p>The Wildlife Management Sub-program ensures managers and employees know how to prepare for or react when encountering wildlife in work settings. The presence of wildlife may create hazards. Wildlife can also impede work as a general nuisance, by leaving droppings in work areas, crossing roadways, or nesting in or close to buildings. Employees can safely coexist with small and large wildlife on job sites by following specific rules and by using good personal judgment to ensure the safety of both humans and wildlife.</p> <p>Coexisting with wildlife is as easy as following the designated speed limits and established roadways. Employees should never approach or seek contact with wildlife including not feeding or leaving food scraps behind to attract wildlife to the area. Animals that someone would consider a pet (cat or dog) should not be treated as a pet if encountered on a worksite. Wildlife should never be disturbed; many animals are prone to become defensive and potentially aggressive or confrontational.</p>
Administrator(s):	Presidents; General Managers; Director, Safety and Training; Facility Managers; and Company Safety, Health & Environmental Professionals.
Administrator Duties:	Administrators ensure the requirements of the Wildlife Sub-program are adhered to and all facilities and employees know how to react to wildlife while working and know that leaving the wildlife undisturbed is the best approach. Coordinate with Corporate Safety and Training Department to improve programs and policies.
Reporting:	Leaders report processes are in place and level of compliance. Incidents are reported in and investigated using our Safety Management System – Intalex – to determine root cause. Data is analyzed to identify trends and improve programs; incident prevention is the goal.
Documentation:	Responsible managers document commitment and plans; the correlating procedure (PR-HS-159.14: Wildlife Management) includes detailed guidance on the proper procedures for how to coexist with wildlife.
Training:	All employees are assigned and must complete all required environmental training as directed. New hire training at all locations includes environmental responsibilities, EAP reviews and directions. Site managers are responsible ensuring customer specific environmental procedures are reviewed.
Resource Allocation:	Resources invested include the purchase of environmentally-friendly material and the use of authorized vendors, development of training materials and company LMS, the Safety Management System (Intalex), this Program, and all supporting policies and procedures.
Guiding Documents:	Policy PO-HS-159: Environmental contains our guidelines and PR-HS-159.14: Wildlife Management contains detailed instructions and guidance on the topic.



Program Summary

VIII. Summary & Review.

The following is emphasized to summarize and exceed goals:

- Believing zero environmental incidents/releases is attainable, with accountability at the core.
- Setting and resourcing this program and sub-programs, reporting on progress.
- Ensuring all employees have clear expectations and maintaining our climate and culture.
- Clarity in roles and responsibilities are incorporated in performance reviews, policies, and procedures.
- Our Safety Management System (observations, incidents, investigations) reflects environmental focus.
- Training and development incorporate environmental learning, using the Learning Management System.
- We train our staff on environmental topics prior to work, observed by competent leaders.
- Company Safety Committees have a clear environmental component and agenda.
- Committees prioritize environmental tasks, reviewing trends, focusing on corrective actions, and more.
- Audits and inspections are conducted for projects, jobs, and tasks, and they include environmental topics.
- When near-misses or reports of non-conformity are recognized, leaders act.
- Required monthly observations include environmental topics, conditions, and behaviors.
- Leaders react to environmental observations and incidents with the vigor applied to quality and safety.
- Sustainability is resourced and equipment required is provided, with orders to inspect and maintain.
- When work is undertaken, Job Safety Analyses include potential environmental hazards.
- Policies, procedures, forms, and documents guide and augment employee and leader actions.
- Guiding documents, like this program, are as important and applied as well as all policies and procedures.
- Finally, our program drives action that is measured and reviewed at the executive level to learn, grow, and seize opportunities...relying on leading indicators where possible, but learning from lagging indicators always.

Measurements guide analysis and identification of shortfalls, while the completion of coinciding corrective actions gauge performance of the program and ensure continuous improvement. Our program measures organizational and personal performance to ensure not only environmental compliance, but environmental leadership. Sustainable practices and prevention of incidents are our goals. However, shortfalls are openly discussed and resolved while incidents are transparently managed with lessons applied in action. Environmental incidents are thoroughly investigated to learn root causes, with an intent to share best practices throughout the company and the industry, if applicable.

IX. Closing.

We have been an industry-leader for over 50 years, and it shows in our commitment to our people, positive culture and program, processes and systems. Studies show that programs like this benefit people and communities in a variety of ways. We appreciate those benefits and are glad for them...doing the right thing, however, is reward enough. We hold to our commitment for zero incidents, believing it is achievable and the right thing to do. But we need your ownership so all of us can receive the many benefits our environmental and sustainability vision promises. This living document is oriented on continuous improvement; send ideas to your leaders or the Director, Safety and Training.

IX. Revision History.

Original issuance: 05-01-2022