

## **ENVIRONMENTAL MANAGEMENT POLICY (EMP)**

### **Environmental Stewardship**

Clancy & Theys Construction Company is committed to operating and conducting business in an environmentally responsible way. This responsibility of environmental stewardship rests with every level of the company, from Corporate to trade workers and everyone in between.

### **Environmental Policy**

Clancy & Theys is committed to maintaining a clean and healthy environment by:

- Complying with federal, state, and local regulations as well as the standards and procedures set forth by this Environmental Management Policy
- Evaluating potential and apparent environmental impacts due to construction
  - Performed by the Site Superintendent, Project Manager, and Safety Officer
- Communicating this policy to our employees and subcontractors
- Continually improving environmental performance and preventing pollution by:
  - Review and evaluation of periodic environmental site audits
  - Post Incident Review
    - Instituting modifications will be made to the program as required.
    - Reinforcement of positive actions
    - Enacting disciplinary actions as required for non-compliance.

We believe this commitment is both good business and a benefit to our employees, their families, our customers, and the communities we serve. This commitment is a primary objective of management and all employees.

### **LEED “Green” Projects**

Clancy & Theys Construction will work with clients that have adopted the **Leadership in Energy and Environmental Design (LEED) Green Building Rating System™** to achieve their desired rating. This EMP may be used in conjunction with LEED requirements. However, this document will serve independently to protect our environment whether or not a LEED rating is required by a client.

### **Planning**

Preventing spills rather than cleaning them up saves both in costs incurred by a corporation and the cost to the environment. So, everyone must be prepared not only to prevent hazardous waste spills but also to contain spills in order to prevent spreading.

### **Procedure**

Prior to commencement of construction, an **Environmental Hazard Analysis (EHA)** should be held between Clancy & Theys and all necessary subcontractors. At the discretion of the C&T Project Manager, this meeting may be held in conjunction with the project pre-construction meeting. This environmental hazard analysis should include, at a minimum, the following topics:

- Proposed on-site hazardous materials storage and use.
  - Storage/Collection Location
  - Spill prevention procedures
  - Spill containment procedures
  - Spill cleanup procedures

A written copy of this policy manual, including the **Environmental Impact Surveillance (EIS) Checklist**, should be maintained at the project and available for review by any affected party. This policy manual should be labeled and conspicuously located at the project site in case of an emergency.

To minimize the risk of spills or releases to the environment, contractors, as required, should employ appropriate protective procedures such as double containment, employee training, overflow protection, and other measures as part of activities involving the use, storage, or handling of petroleum products or hazardous materials while on a Clancy & Theys construction project.

## **Roles & Responsibilities**

### **C&T Project Manager**

The Project Manager should be responsible for coordinating and managing all environmental activities during the construction phase. Duties should include, but are not limited to, the following:

- Identify the environmental requirements of the projects
- Ensure personnel are assigned to oversee and/or perform needed duties
- Act as client/public liaison
- Oversee the environmental program and review reports
- Enact disciplinary actions as required for non-compliance

### **C&T Superintendent**

The Superintendent should work in conjunction with the project manager and should be directly involved in managing and coordinating environmental activities. Duties should include, but are not limited to, the following:

- Assign trained personnel to oversee and/or perform needed duties
- Monitor construction activities to ensure that identified and appropriate control measures are in place and in compliance
- Ensure correct procedures are followed in the event of an environmental incident
- Ensure appropriate monitoring is performed
- Review incident response and reports
- Assist in investigating and resolving
  - Environmental incidents
  - Complaints
- Address non-compliance issues with the appropriate party
- Enact disciplinary actions as required for non-compliance

### **C&T Safety Representative**

- Perform site audits and surveillance, initiate actions, and complete necessary reports
- Complete periodic EIS Checklist (*See Attached*)
- Report any activities that have resulted in, or have the potential to result in, an environmental incident immediately to the site Superintendent
- Perform or ensure appropriate monitoring is performed as required
- Investigate and assist in resolving
  - Environmental incidents
  - Complaints
- Ensure training has been performed for C&T employees assigned environmental duties
- Maintain record-keeping/documentation of site audits

## **Environmental Complaints**

- All environmental complaints shall be reported to the C&T Project Manager or Superintendent.
- Complaints and resolutions of same should be documented and maintained in records.

### **Monitoring & Reporting**

Monitoring is an integral part of this Environmental Policy and its success. Therefore, it should include, but not be limited to:

- Identifying any negative impacts from construction activities
- Demonstrating compliance with regulatory entities
- Identifying whether further control or corrective action is required

The frequency of monitoring will be largely dictated by the regulatory requirements as well as ongoing activities.

### **Reporting Spills**

If a hazardous waste spill occurs, the responsible party must notify Clancy & Theys Construction immediately by telephone (*see Emergency Contact List for site specific contact numbers*), followed by a written incident report within 24 hours that includes a minimum of the following information:

- Description of the spill or release event
- Names of individuals involved
- Date and time of spill or release
- Copy of the MSDS for the material spilled or released
- Estimated quantity and type of material spilled or released
- Duration of the release
- Steps taken or planned to reduce, eliminate, and prevent recurrence of the spill or release

### **Environmental Issues**

#### **Erosion Control / Storm Water Run-Off**

Before starting any construction activities, such as clearing, grading, excavating or similar activities that will disturb or expose soil, Best Management Practices (BMP) and proper erosion/sedimentation controls must be in place, as required, to prevent sediment or silt run-off.

#### **Best Management Practices (BMP)**

- Prohibit dumping of wastewater or any hazardous waste materials into storm drains, areas that drain to storm drains, or areas that would impact the environment.
- Maintain construction material and hazardous waste storage areas
  - Materials to be stored in such a manner as to prevent spills and/or contain leaks
- To prevent debris and material from entering storm drains, maintain good housekeeping and dispose of waste properly in appropriate trashcans or dumpsters.
- Maintain trash and dumpster areas to prevent materials from being washed into storm drains.
- Hazardous materials shall be stored in labeled containers and segregated as required.
- Hazardous materials shall be disposed of properly and in accordance with regulations imposed by local and federal authorities.
- Use berms, sandbags and other barriers to contain areas where contaminants may come into contact with storm water runoff.
- Regularly inspect and clean storm gutters and drains.

#### **Inclement Weather Issues**

##### ***High Wind***

- Precautions should be taken prior to and during high winds to prevent debris from contaminating the project as well as adjacent property.

##### ***Rain***

- Precautions should be taken prior to and during rains to prevent debris from contaminating the project as well as adjacent property.

After an incident, an environmental audit should be made using the attached EIS Checklist to assist in assessing possible impact resulting from inclement weather.

#### Dust Management

Ongoing dust suppression should be maintained.

#### Noise Management

- Workers exposed to noise shall be protected in accordance with the OSHA requirements.
- Off-site noise levels shall be maintained in accordance with appropriate regulatory requirements.

#### Washing Operations

For washing operations performed outside:

- Prevent wastewater from entering storm drains or other areas that will have an environmental impact.
- Direct wastewater to containment areas for collection, landscaped areas if vegetation will not be damaged, or to the sanitary sewer system.
  - When cleaning outside areas, avoid excessive hosing by utilizing dry sweeping or vacuuming when feasible.
- Sediment (including cement) should be cleaned up in a manner that does not allow it to reach a storm drain or waterway.
- Equipment tires should be cleaned before leaving the site to avoid tracking sediment into the roadway or off the site.
- Spill/Clean-up kits of appropriate size and type should be located on site as necessary.

#### Petroleum

Spills of hydraulic fluid, oil and other petroleum products are to be cleaned up immediately to prevent discharge of these fluids with storm water run-off. Petroleum contaminated soil should be cleaned up and disposed of properly.

- Storage containers should be kept closed, clean, and free of oily residue.
- Temporary petroleum tanks shall either be of double-wall construction or have a liquid-tight berm constructed around them.
  - Tanks shall be protected from collision as required by OSHA regulations.
- Vehicles and other equipment should be maintained to prevent fluid leaks.
- Refueling stations for all equipment should be maintained in such a manner as to avoid and/or contain spills.
- In areas where liquid fuel powered mobile equipment is being used, a spill kit of adequate size should be maintained.
- Perform vehicle maintenance and washing only in approved areas away from curbs, gutters and storm drains.

#### Clean-up

Sorbent materials can be used to effectively clean up various materials spilled on pavement, water, and soil. Soil or other media that has been contaminated with petroleum or other pollutants should be excavated or remediated to prevent contaminated discharges to a storm drain or waterway. Excavated contaminated materials should be stored in containers or on plastic and covered so that the contamination is not flushed back onto the ground during a rainstorm.

- Clean up spills and leaks quickly and properly— never hose spills into storm drains.
- Spill containment kits of sufficient size and type should be available within the immediate vicinity of potential spill areas or storage/collection areas.
  - Subcontractors are responsible for their own cleanup. This includes, but is not limited to, the cost of materials, labor, legal fees, environmental fines, disposal fees, etc.
  - Subcontractors will hold harmless Clancy & Theys for any repercussions incurred or levied due to a subcontractor hazardous waste spill.

### **Disposal of Hazardous Waste**

- Proper disposal of waste materials depends partly on the type of contaminant. Hazardous wastes (such as flammable petroleum products and solvents, thinners) and materials contaminated with hazardous wastes may be considered regulated wastes. For information on testing and disposal of contaminated soil, subcontractors should contact the appropriate local agencies.
- Lead/Asbestos
  - Removal and disposal shall be conducted by contractors licensed to conduct such actions and in accordance with appropriate regulating agencies.

### **Inspections / Audits / Surveillance**

- Clancy & Theys will continually conduct environmental impact surveillance with the goal of prevention of hazardous waste spills that would affect the environment or other areas.
  - The EIS Checklist (copy attached) may be used to assist in the surveillance program.
- Subcontractors are required to conduct their own environmental impact audits as needed.
- Documentation of all EIS should be maintained at the project site for review.

### **Training**

- Clancy & Theys should notify all affected contractors of the Environmental Management Policy and the location of the Environment Management Plan.
- Prior to the start of a project, Clancy & Theys may conduct a one-time training session for key personnel. The time and location will be designated by the Branch Safety Manager. All Subcontractors are encouraged to have a representative attend this training. Non-attendance will not relieve a subcontractor of their environmental responsibilities.
- All Subcontractors are responsible for training their employees and any lower tier subcontractor(s) in:
  - The C&T Environmental Management Policies and government regulations.
  - the handling, storage, containment, cleanup, and disposal of hazardous waste
  - Training shall be in accordance with the OSHA 29 CFR 1926.59, 1910.1200 & 1926.65 standards.
- Anyone required to handle hazardous material or having the potential to be exposed to hazardous materials shall be trained in accordance with the OSHA 29 CFR 1926.59, 1910.1200 & 1926.65 standards.

# ENVIRONMENTAL IMPACT SURVEILLANCE (EIS) CHECKLIST

Project Name: \_\_\_\_\_ C&T Job # \_\_\_\_\_ Date \_\_\_\_/\_\_\_\_/\_\_\_\_  
 Performed By: \_\_\_\_\_ Time \_\_\_\_\_ AM PM

Reason for Audit: ☐ Periodic ☐ Pre/Post Inclement Weather ☐ Complaint ☐ Other \_\_\_\_\_

Impact Item	N / A	Issue Noted	Corrective Action Required (Yes) / (No)	Date Corrective Action Completed
Storm Water Run-Off				
Erosion Control Measures				
Dust				
Noise				
Vibration ( <i>Pile Driving/Blasting/Compacting</i> )				
Spill				
Tree Protection				
Waste				
Protected Species				
Material Storage Area				
Waste Storage Area				
Wash Areas				
Undisclosed / Newly Discovered Contamination				
Other				

## Notes / Explanations / Corrective Actions


Signature (*Required*) \_\_\_\_\_

# ENVIRONMENTAL MANAGEMENT EMERGENCY CONTACT LIST



Project Name:

Company or Agency	Contact Name	Emergency Phone #	Alternate Emergency Contact Info