



SECTION 6.0 STANDARD OPERATING PROCEDURES AND SITE SPECIFIC RULES

ZERO DISCHARGE AND WASTE MANAGEMENT POLICY:

Michels employees and Sub-Contractors shall adhere to a "zero discharge" policy while working at all locations. Employees and Sub-Contractors shall place any and all trash and debris such as plastic cups, paper, cigarette butts and packaging in the appropriate waste container. Hazardous wastes shall be disposed of in strict compliance with local, State and Federal regulations. Procedures for each type of waste must be followed to assure proper packaging, handling and shipping.

In general terms, hazardous wastes are materials that exhibit qualities that are potentially harmful to humans and/or the environment and that are the waste or by-products of production operations. They include materials and mixtures of materials that are toxic, corrosive, flammable, explosive, and carcinogenic.

ENVIRONMENTAL PROTECTION:

Michels Environmental Policy is based on the following principles:

- Comply fully with the letter and spirit of environmental laws and regulations
- Provide appropriate environmental training for employees and subcontractors
- Protect air, land and water resources in an environmental sensitive manner.
- To assist in finding solutions to environmental problems.
- To be good corporate citizens and neighbors by promoting environmental compliance and environmental stewardship.

SPILL PREVENTION

Michels will minimize the potential for spills, to the extent practical. Michels and all their subcontractors must comply with this plan and all applicable environmental and safety laws and regulations. Michels will implement the following practices to prevent spills of fuels, lubricants, and other hazardous substances at the Site.

- **Fuel storage tanks, if present**
 - Locate the tank at least 100 feet from wetlands or waterways and at least 200 feet from potable water sources
 - Locate tank in an area away from storm drains. If storm drains are located, necessary precautions will be taken to prevent potential spills from entering storm drains, including placing equipment within temporary barriers
 - Locate tank in a secure area with adequate lighting
 - Place tank(s) inside a temporary earthen berm lined with plastic to provide containment for 110% of the largest tank (OR provide double wall tanks)
 - Siphon or pump any storm water from the containment after rain events
 - (Note: Inspect the precipitation first for sheen or oil. If oil or sheen is present, collect the liquid for disposal).
 - Lock pumps when not in use
 - Inspect the tank, containment, hoses, couplings, pumps weekly
 - Keep sufficient spill kits near tank
- **Drum or small container storage**
 - Store 55 gallon drums on spill pallets or in a containment, preferably under roof or cover
 - Store containers at least 100 feet from wetlands or waterways.
 - Pumps and other portable equipment as well as their gas cans should be placed in secondary containment (i.e. plastic tubs or kiddie pools) when in use

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- Use small containers which are in good condition (maximum capacity of 5 gallon)
 - Protect the containers from the elements and physical damage (i.e. in non traffic area)
 - Replace any leaking or damaged containers.
 - Close containers when not in use.
 - Keep sufficient spill kits near drum and container storage sites.
- **Fuel transfers from a storage tank or container to a vehicle or equipment**
 - Staff must monitor the transfer operations at all times.
 - Operate during daylight hours or where lighting is adequate to illuminate the area.
 - Refuel at least 100 feet from wetlands or surface waters and at least 200 feet from private water sources and at least 400 feet from public water sources.
 - NOTE: Exceptions may be allowed for certain construction activities where the above requirements are not practicable
 - Exercise extreme caution for transfers in areas where setback distances can not be met such as placement of absorbent pads or drip pans beneath transfer points, creating temporary earthen berms, or other similar precautionary spill measures.
 - Keep sufficient spill kits nearby during fuel transfers.
 - **Fluids used in a vehicle or equipment**
 - Inspect the equipment daily for leaks.
 - Repair any defective tanks, hoses, fittings, etc. prior to use.
 - Park the equipment at least 100 feet from wetlands or surface waters when not in use.
 - Immediately turn off the equipment upon discovery of a leak
 - Keep sufficient spill kits on equipment.
 - **Maintenance and repair activities**
 - Routine maintenance (oil changes) should be completed at least 100 feet from wetland or waterways
 - Repairs should also be completed at least 100 feet from wetlands or waterways (if possible)
 - Drip pans should be used during all maintenance and repairs at points of fluid release
 - Containerize all fluids in drip pans, saturated spill absorbents, and or contaminated soil in sealed, labeled drums

SPILL CONTROL AND RESPONSE PROCEDURES:

A spill is an unintentional release of hazardous material to the environment. All spills will be reported immediately and cleaned up as soon as possible. A quick response to a spill is essential and will minimize damage to the environment and reduce clean-up costs. The following procedures are used to effectively control and respond to a spill.

1. Safety First

- Identify immediate dangers or risks. If there is a fire, explosion or other hazards contact 911.
- Take appropriate safety measures to protect on-site personnel and the general public.
- Establish site security by restricting access of non-essential personnel to the area.
- Identify the material(s) spilled.

2. Assess the Release and Address Immediate Threats

- Identify and protect any on-site or nearby environmentally sensitive areas such as surface waters, wetlands, drainage ditches, storm sewers, drinking wells, etc.
- If necessary, construct berms or cover/plug storm sewers and manholes.
- If the spilled material has the potential to enter surface waters, immediately place absorbent booms, skimmers, and dikes on the surface waters to contain the spill.
- Additional sorbents socks/booms should be available during river crossings.

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3. Report the Spill

- Immediately Notify Supervisor, Environmental Coordinator, or Corporate environmental staff who will immediately notify any appropriate regulatory agencies, client and other relevant personnel.

4. Clean Up the Spill

- Construct berms or other structures that will contain the release.
- If the spilled substance has the potential to enter surface waters, use absorbent booms or other means to collect the spilled substance.
- Protect spilled material from weather conditions such as high winds or precipitation that may spread the spill.
- Recover any free product.
- Do not do anything that will amplify the spill such as trying to wash it away with water. Washing the area with water will only spread the release and may cause further environmental damage.

5. Arrange For Proper Disposal

- Contact waste disposal contractor or contact Michels Corporate Environmental staff for assistance.

MICHELS BASIC HS&E RULES:

Safety Rules have been developed with input from supervision and employees. While held to a minimum, the rules address behaviors and work practices that can lead to accidents and injuries. Each employee, subcontractor, visitor, customer, and vendor shall become familiar with and follow the Safety Rules. Most accidents can be prevented if everyone uses assigned safety equipment and follows the established safety rules. To operate a safe and successful business, Michels must work as a team to think safe, work safe, and be safe. These following rules are fundamental and apply to all employees, subcontractors, visitors, customers, and vendors:

- This project requires that personnel be able to don and doff a respirator should the need arise; therefore, all employees must report for work fit for duty. Likewise a medical clearance is required to be able to fulfill any position.
- Employees will come to work clean shaven, in order to properly wear the respirator if necessary.
- Comply with all specific safety instructions such as posted signs, those given by your supervisor, and those listed in the Safety Handbook where applicable.
- All injuries, *no matter how slight*, as well as every "near miss" or "close call" having potential to cause harm to individuals or damage to property are to be reported to your supervisor immediately.
- Report any potential physical hazards and/or unsafe acts immediately to your supervisor
- Consent to search of your person and baggage.
- Have no controlled substance such as drugs or alcohol on the job.
- If involved in an accident, you must submit to a post-accident drug and alcohol screen.
- To have no firearms or weapons in your possession.
- Conduct or attend documented safety meetings and turn in Michels Safety Meeting Minutes.
- Horseplay and practical jokes are prohibited, as they may cause injury.
- Operate equipment, machinery, or power tools only when authorized to do so.
- To do all that you possibly can do to keep your work area free from hazards.
- Use only proper tools and equipment for the job and use them correctly as instructed by your supervisor. Should you need to use tools and equipment you are not familiar with, contact your supervisor before using.
- Overhead cranes are designed to lift straight up and should not be attached to loads on an angle.
- Before you start work, you must notify your supervisor of any permanent or temporary impairment that may reduce your ability to work in a safe manner.
- If there is any doubt as to the safe work method to be used, consult with your supervisor and agree on a safe work practice.
- Verify safety permits such as special entry, hot work, confined space, and lockout/tag-out before start of work. It is your responsibility to inquire if a special permit is required or issued.

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