

Environmental Policy

March 28, 2017

Quick N Quality Projects LTD Document Sender : Michelle Bryan



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Environmental Policy

ALL Quick'N Quality employees, contractors and sub-contractors are expected to support the company's efforts to protect the Environment by:

- 1. Maintaining standards for the transportation, storage and disposal of dangerous goods according to Municipal, Provincial, Federal, and site specific guidelines.
- 2. Comply with the site-specific environmental protection plan,
- 3. Reporting any environmental incidents to the controlling regulators, and
- 4. Comply with waste control and disposal procedures.

Quick'N Quality will make every effort to minimize the effect of our operation on the environment. We are unified in our commitment to environmental excellence and continuous improvement. Management will constantly assess our impact on the environment and apply what we have learned over the years to every project.

Environmental management is not just of a few specialists; it is a crucial and integral part of our day-to-day business. Everyone can make a difference.

* The safety information in this policy does not take precedence over Occupational Health and Safety legislation and environmental Protection Act. All employees should be familiar with these Acts.

1. ENVIRONMENTAL PROTECTION

1.1 ENVIRONMENTAL RESPONSIBILITIES

Quick'N Quality Management and Supervisors

Management and supervisors are responsible for compliance with Provincial and Federal Environmental Laws and Contractual Company Policy. Management must ensure all employees know and follow these laws and guidelines.

Employees

Employees are responsible to report any incident or potentially serious environmental conditions to their supervisor.

1.2 DEFINITIONS

Adverse Effect

Impairment of/or damage to the environment, human health, safety, or property.

Environment

Components of the earth and includes:

- i. Air, land and water,
- ii. All layers of the atmosphere,
- iii. All organic and inorganic matter and living organisms, and
- iv. The interacting natural systems that include components referred to in sub-clauses (i) to (iii).

Owner of a Substance

The owner of the substance: immediately before or during the release of a substance.

Person Having Control of a Substance

The person handling, managing, and/or having control of a substance.



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Release

Includes spills, discharges, disposal of, sprays, injections, inoculations, abandonments, deposits, leaks, seeps, pours, emits, empty, throw, dumps, placing and exhausts.

Transportation of Dangerous Goods Regulations (TDGR)

Transportation of Dangerous Goods Regulations, for the protection of the general public from hazards associated with dangerous goods during transport.

1.3 GENERAL

- Hazardous waste must be stored in approved containers, properly marked, handled, and disposed of according to applicable TDG, WHMIS and jurisdictional regulations.
- Equipment and vehicle servicing and cleaning will be done in a manner to reduce waste and environmental impact.
- All equipment will be kept in good running order, with regular maintenance, to reduce air/water/soil contamination, and noise pollution.
- Any improper discharge of a hazardous product is to be reported.
- Wastes will not be burned, except in proper facilities, and as designated by Regulation or Customer Policy.
- Precautions are to be taken to ensure that storage and transference of materials does not pose a threat to the environment. Fuels/oils and general garbage are the most common work site contaminants.

1.4 HAZARD ASSESSMENT AND CONTROL

Before handling, storing, using or transporting any hazardous materials that may cause serious effects to the environment if spilled or improperly discharged, a Hazard Assessment must be conducted.

The Hazard Assessment must include the following:

- Obtain and read a current copy of the MSDS (Material Safety Data Sheet).
- Can a less hazardous product be used?
- Proper storage, handling, transportation and use guidelines, as per the MSDS and TDG Regulations.
- Proper employee training, protection and PPE.
- Emergency response guidelines, equipment and training.
- Reporting guidelines in the event of an uncontrolled release.
- Regular inspections of storage, handling and transportation facilities and equipment.
- Waste disposal regulations and procedures.
- Regular spot checking and auditing of products, quantities, facilities, Company guidelines and emergency response capabilities.
- Suitable and accurate record keeping.
- Consideration of all applicable local, provincial, federal and other jurisdictional regulations, as well as Customer requirements, as long as they don't conflict with controlling legislation(s).

1.5 INSPECTIONS

- Look for potential environmental problems (i.e. improper storage or spilled fuels/chemicals; emergency response equipment status/supply), and ensure the field people know what to do should a situation arise
- Inspections are to be done on a regular basis as well as "spot checks". The format shall be reviewed periodically as other environmental concerns are encountered. Records of the inspections will be kept on file to ensure deficiencies are addressed.

1.6 RELEASES

During the course of normal business activities there is the possibility of releases of controlled products that could be harmful to the environment. We believe that through planning, site management and preventive maintenance, the frequency and severity of releases can be minimized. The number and nature of controlled products in normal operations is usually restricted to hydrocarbons in the form of Diesel fuel, drilling fluids, lubricating oils (new and used), and hydraulic oils. When a release occurs, the Provincial and Federal agencies



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that administer safety, transportation and environmental legislation hold the discharger responsible. The discharger is responsible to report the release and to contain and clean up the product, or have these actions carried out, and to restore the site to pre-release condition. In the event of a release of hazardous substances, the following guidelines must be followed.

1.7 RELEASE RESPONSE

- Positively identify the released product.
- Check the MSDS to ensure the correct personal protective equipment is available for use by employees doing the cleanup.
- Alert other parties who may be affected by the release, and secure the area.
- Safely contain the released material. Spread an absorbent material to soak up the released material.
 Prevent the material from entering any sewer system or any body of water. A dike of sand, gravel or snow may be required.
- Clean up the released material. Once the fluid has been absorbed, the material should be shoveled into drums or plastic garbage cans with tight fitting lids. Concrete and wood pads should be swept to make sure that all fluid soaked material has been removed, and washed with a detergent if necessary to ensure the surface is no longer slippery. If the release occurs on bare ground, some surface soil may have to be removed. Removal of large amounts of soil should not be necessary if the release is contained and cleaned up promptly. Most of the fluid will remain at or near the soil surface.
- Notify the customer/landowner whose property the release occurred on and the head office.

Senior Management will notify the proper authorities of the release if required by regulation.

- **Disposal of fluid soaked soil and absorbent.** Label the containers of material that has been cleaned up and store the containers in a location where they will not interfere with work or traffic, and wait for instructions from head office before disposal. The method of disposal depends on the flashpoint of the fluid, the volume of fluid soaked material, and the type of absorbent material used. Hydrocarbon contaminated wastes with flashpoints greater than 61°C generally are not classified as hazardous wastes, and may be handled in accordance with local landfill regulations. The landfill operator may require laboratory confirmation of the flashpoint of the waste.
- Decontaminate reusable equipment.
- Restock spill response equipment and supplies.
- Debrief responders and discuss response.
- Prepare a complete report.
- The objectives of release response, in order of importance, should be to protect life, protect the environment and protect property. In some cases the situation may be beyond your control. Do not put employees or others at risk. There are spill response agencies that are trained to handle dangerous spills.

1.8 REPORTING BY SENIOR MANAGEMENT

Any spill, release or emergency that **may** cause, **is** causing or **has** caused an adverse effect to the environment must be immediately reported to Alberta Environment.

An oral report to the authority having jurisdiction must be made within 24 hours or immediately on becoming aware of the occurrence, followed by a written report within seven (7) days. **Responsibility for reporting** the release is with the person who permitted the release or the person having control of the substance.

The following information must be provided:

- Name of person reporting the release
- Name of company who had the release
- A description of the circumstances leading to the release
- The type and quantity of substance released
- The details of any action proposed or taken at the release site
- A description of the immediate surrounding area

The agency will give a reference number to confirm that the report was made. The reference number must be used in all further calls and reports regarding this specific release. Record all details of the content of the



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conversation. Only give facts, not opinions.

Alberta Environment 1-800-222-6514 or 780-422-4505

1.9 REPORTABLE QUANTITIES

- **Diesel fuel** report releases that have or may have an adverse effect and are at or exceed 200 liters (TDGR).
- **Gasoline** report releases that have or may have an adverse effect and are at or exceed 200 liters (TDGR).
- Glycol not regulated under TDGR; report spills that have or may have an adverse effect.
- **Hydraulic oils** not regulated under TDGR; report spills that have or may have an adverse effect. **Exceptions:** Saskatchewan releases in excess of 100 liters onsite and 50 liters offsite must be reported.
- **Used oil (spent lubricating oil and un-drained lube oil filters) -** Report releases that have or may have an adverse effect and are at or exceed 5 kilograms or 5 liters, (TDGR).
- Any release which has entered a sewer or body of water must be reported.
- A spill of any size that has occurred on a concrete pad and properly contained and cleaned up does **NOT** have to be reported.

Senior Management will notify the proper authorities of the release if required by regulation.

1.10 ENVIRONMENTAL PROTECTION FOR FUEL STORAGE FACILITIES

All tanks in which fuel/oil or chemicals are stored must be surrounded by a berm or other equivalent structure designed to contain the contents in the event of a tank leak or failure.

- When the berm contains one tank, the berm must contain 110 percent of the capacity of the tank; or
- 110 percent of the volume of the largest tank within the berm area plus 20 percent of the aggregate capacity of all other tanks, when there is more than one tank.
- The berm area, including the area underneath the tank, shall have an impervious liner that is suitable for the product in the tanks.
- The berm shall be constructed to withstand the hydrostatic head associated with it being full of liquid.
- The berm area shall be graded to a sump with necessary piping to pass over the dike for rainwater removal. There shall be no openings in the berm that provide a direct connection to any place beyond the berm area.
- One 9kg ABC fire extinguishers shall be mounted within 6m of the storage facility.
- Bonded hoses of a diameter 38mm (1.5 in.) or less shall be used to dispense stored fuels.
- All tanks shall be properly grounded with a minimum of 3m (10 ft.) grounding rod.
- Tanks shall be locked at all times and open only when dispensing contents.
- Proper access must be provided to allow employees to operate the valves and refill the tank. The access system should be constructed of non-combustible materials.

Emergency Response: Spill with Potential Adverse Environmental Impact

Procedure

- Containment of spill by using any of the following methods:
 - Sorbent socks
 - Sorbent pads
 - Soil berms/dams
- Report spill to immediate supervisor or designate immediately
- Clean up:
 - Small spills can be cleaned up with use of Sorbent pads
 - Large spills may require capturing spill in containers by using bailing or vacuum
 - Dig out contaminated soil and place in a lined designated site in each pit with accumulated containment disposed of in an approved landfill
 - Treat area with a microbial bioremediation product such as "gator".

Garbage containment



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- Garbage shall be bagged and placed in containers where all employees are aware of the location
- Loose garbage on the ground should be picked up, removed and located with all other refuse

Discard of Refuse

- Refuse shall not be discarded in watershed areas
- It shall be discarded in an established refuse dump or spot known to supervisors and workers
- No Toxic material shall be discarded with normal household type refuse. It should be discarded in an established area / establishment





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