



**Berry Bros. General Contractors, Inc.  
Corporate Policy Procedure**

Section # 22

Issue Date: 02-19-08

**(HSE) Health, Safety & Environmental  
Policies and Procedures Manual**

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**ENVIRONMENTAL MANAGEMENT**

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**SUBAPRT A - PURPOSE**

This program provides general procedures and guidelines for Berry Bros. General Contractors, Inc. Environmental Management Program. The Berry Bros. environment includes the soil, water, air, and natural habitat within and around Berry Bros. boundaries and their worksites. This program defines and establishes the responsibilities of the Environmental Management Department (EM) and Berry Bros. facility manager for managing and conducting environmental activities. This program also ensures the cooperation and support of all Berry Bros. facilities in an effort to achieve the environmental goals of the Berry Bros. to meet Federal, State, and local environmental regulatory requirements.

**SUBPART B - APPLICABILITY**

This Directive applies to all Berry Bros. facilities, employees and on-site contractors.



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**SUBPART C - RESPONSIBILITIES**

Berry Bros. Management is responsible for all environmental compliance activities at all company facilities. The Environmental Manager (EM) has overall environmental responsibilities as the center focal point for environmental activities. Under the delegated authority of the Berry Bros. owners, the EM provides continuous surveillance, review, evaluation, and assurance of environmental activities at all levels throughout the company. Under this authority, the EM has control for approval or cessation of all phases of acquisition and operation of hazardous or potentially hazardous facilities, systems, or equipment that may result in noncompliance with regulatory standards.

All facility managers shall ensure that internal organizational plans and procedures are maintained to implement and comply with the federal, state, and local environmental laws and regulations.

**SUBPART D - PROCEDURES**

***Personnel Training and Certification***

As required to meet federal, state, and local regulations, ordinances, and guidelines, all personnel involved in hazardous waste operations and transportation, chemical inventory, storm water management, asbestos, lead, and PCB abatement activities, emergency and chemical spill activities are required to undergo a training and certification program. Supervisors are responsible for ensuring that their employees complete the appropriate training.

***Hazardous Waste Operations and Emergency Response***

(HAZWOPER) (29 CFR 1910.120) Employees designated to participate in emergency response operations or site remediation must be trained and certified before taking part in actual emergency operations and must receive annual refresher training. Annual refresher training is provided by the EM and meets OSHA 29 CFR 1910.120 requirements. Records of training and certification shall be retained by the employer for at least 5 years.



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***Hazardous Waste Personnel Training***

Training and certification must be given to all hazardous waste operations personnel working at any Berry Bros. Hazardous Waste Storage Facilities. This training must occur within six months of being hired, with employees not working in an unsupervised capacity until they are trained. Training must be renewed every 365 days. The employer shall retain records of training and certification for at least 5 years.

***Hazardous and Controlled Waste Generator Training***

Training must be given to personnel who utilize accumulation sites. This training must occur within six months of being hired or of assuming new duties that are associated with hazardous waste, with employees not working in an unsupervised capacity until they are trained. Training must be renewed annually. This training is provided by the EM.

***Chemical Inventory Reporting Training***

All personnel using hazardous chemicals must attend this training. This training is necessary for Berry Bros. to maintain an accurate chemical inventory for reporting purposes.

***Incident Command Training***

Employees designated to manage emergency response operations must be trained and certified and must receive annual refresher training. Annual refresher training is provided by the EM and meets 29 CFR 1910.120 requirements. The employer shall retain records of training and certification for at least 5 years.

***Storm Water Inspection Training***

All personnel involved in storm water inspections shall attend an annual training class provided by the EM to ensure that inspections are being carried out regularly and correctly.



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***Pollution Prevention Training***

All personnel shall have access to voluntary pollution prevention training provided by the EM. This training will be self-paced, self explanatory, and will increase employee awareness of pollution prevention goals and opportunities.

***Air Compliance Awareness Training***

Operators of Title V Permit significant, insignificant, and trivial sources shall be trained in basic essentials in equipment maintenance, source inspection, and record keeping.

***Spill Prevention, Control, and Countermeasures Training***

All above ground storage tank (AST) and UST users and operators shall attend an annual spill prevention briefing provided by the EM. These briefings will cover the following: loading and unloading procedures; site drainage; spill response procedures; applicable pollution control laws and regulations; known spill events or failures, malfunctioning storage components, and precautionary measures.

***Environmental Essentials for Construction Contractors***

The training will provide basic principles of understanding for construction contractors for waste management, chemical management, threatened and endangered species, and wetland locations.

**SUBPART E - WASTE MANAGEMENT**

The broad goals set by Resource and Conservation Recovery Act (RCRA) include protecting human health and the environment from the hazards posed by waste disposal; conserving energy and natural resources through waste recycling and recovery; reducing or eliminating the amount of waste generated; and managing wastes to protect human health and the environment. Solid waste compliance includes activities pertaining to hazardous waste, controlled waste, special waste, universal waste, used oil, and debris. The programs under RCRA focus on three waste categories:



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- Subtitle C — this hazardous waste program regulates hazardous waste from origination to its ultimate disposal.
- Subtitle D — this solid waste program includes minimum Federal technical standards and guidelines for State solid waste plans.
- Subtitle I — this UST program regulates underground tanks that contain petroleum or hazardous substances (as defined under CERCLA)

***Responsibilities of the Environmental Manager (EM)***

- Ensure proper management and disposal of hazardous and controlled wastes in accordance with applicable regulations.
- Provide guidance and instruction to Berry Bros. user organizations regarding hazardous and controlled waste management and disposal.
- Provide training for organization personnel.
- Properly dispose of waste materials in accordance with applicable waste management guidelines.
- Provide guidance and instructions to Berry Bros. user organizations regarding universal wastes and other materials to be recycled.
- Obtain one-time written and signed notice from used oil burner prior to shipping any off-specification used oil fuel to used oil burner.
- Report to State and Federal agencies.

***Responsibilities of User Facilities & Departments***

Ensure that waste materials generated are properly managed as detailed in the [company] waste management guidelines. Appoint one Point of Contact (POC) and two alternates for each container collecting waste area and ensure that the personnel attend the hazardous and controlled waste generator training. Maintain hazardous material/waste tanks and containers to ensure structural integrity. Maintain proper identification and labeling of all hazardous material/waste in the area. Turn in chemicals with expired shelf life, un-needed or obsolete. Ensure employees attend training sessions. Identify all expected waste-producing processes prior to beginning the process and submit the list of processed to the EM.

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## GUIDELINES

Specific instructions for waste management are listed in the Berry Bros. Waste Management Guidelines and cover the following:


- New or existing hazardous waste streams, medical waste, chemical product disposal, unknown chemical disposal, empty container management, and debris disposal.
- Handling of medical waste or other potential infectious materials will be in accordance with the Berry Bros. Bloodborne Pathogens Program.
- Training of employees with potential occupational exposure is the responsibility of each Berry Bros. user organization/contractor involved in the generation of controlled waste and must be provided at the time of initial assignment and as required thereafter.
- If the waste material is a recyclable item (e.g., drums, pallets, white paper, cardboard, toner cartridge, oil, tires), ensure that the item is recycled by placing it in the appropriate recycle container. Regular trash shall be placed in regular garbage cans/dumpsters.

## **SUBPART F - HAZARDOUS MATERIALS (HM) COMPLIANCE**

The EPCRA of 1986 establishes requirements regarding emergency planning and "Community Right-to-Know" reporting on hazardous and toxic chemicals. Section 311 requires facilities that have MSDS's for chemicals held above certain quantities to submit either copies of their MSDS's or a list of MSDS chemicals to the State Emergency Response Commission, the local emergency planning committee, and the local fire department. The [company] maintains an inventory of chemicals used/stored on-site for reporting the annual chemical inventory and toxic release inventory to EPA, ADEM, and other regulatory agencies.

### ***HM Compliance Responsibilities of the Environmental Manager (EM)***

Ensure proper tracking and reporting of hazardous materials. This reporting is maintained in accordance with the EM Records Plan. Maintain a chemical inventory database of all hazardous materials used throughout the company or by active contractors. Report, as required, to agencies about hazardous chemicals at Berry Bros. facilities.

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***HM Compliance responsibilities of Berry Bros. Facility Managers***

Each facility manager shall: (a) appoint at least one hazardous material POC for each office/department within the organization; (b) accurately report hazardous material stored and used per chemical inventory requirements; and (c) keep all lists up to date.

**SUBPART G - CHEMICAL SPILLS**

Under EPCRA, facilities must immediately notify the local emergency planning committee and the State Emergency Response Commission if there is a release into the environment of a hazardous substance that is equal to or exceeds the minimum reportable quantity set in the regulations. This requirement covers 356 extremely hazardous substances and more than 700 hazardous substances subject to the emergency notification requirements under CERCLA Section 103(a) (40 CFR 302.4). A written follow-up notice must be submitted to the local emergency planning committee and the State Emergency Response Commission as soon as practicable after the release. The follow-up notice must update information included in the initial notice and provide information on actual response actions taken and advice regarding medical attention necessary for citizens exposed. All chemical spills shall be cleaned up immediately after occurrence to ensure the safety of employees and to protect the environment.

***Spill Responsibilities of the Environmental Manager (EM)***

Respond to any spill when requested or when notified by a 911 emergency call. Provide direction in proper cleanup of chemical spills. Notify State and Federal agencies of all reportable quantity spills, as required, and provide written follow-up, as needed, in accordance with State and Federal guidelines and regulations.

***Spill Responsibilities of Facility Managers***

Evaluate whether the spill can be cleaned up internally. Begin immediate cleanup of small spills of known type and quantity; call T. Baker Smith & Sons, Inc., 412 South Van Avenue, Houma, Louisiana 985-868-1050, Mr. Earl Eues for assistance, if necessary.



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Call 911 for all other spills, including small spills of unknown type, all dangerous chemical spills, and all large spills. Facilities shall implement their Emergency Plan.

Clean up spill and ensure proper disposal of waste materials from small spills. Notify EM of all spills regardless of size, such that a determination will be made whether the spill exceeds a reportable quantity as defined in 40 Code of Federal regulations 300.

Submit a Mishap Report depending on the severity of the spill.

## **SUBPART H - POLLUTION PREVENTION**

Pollution prevention is the most cost-effective approach to environmental management. By reducing the use of toxic chemicals, Pollution prevention improves worker health and safety, protects the environment, helps maintain facility compliance with environmental regulations, and saves money. The Berry Bros. goal is to meet Federal requirements to reduce the release and off-site transfer of toxic chemicals without jeopardizing its mission. Pollution prevention includes source elimination or reduction, material replacement or substitution, affirmative procurement, recycling, and conservation of fuel, energy, and water.

### ***Pollution Prevention Responsibilities of the Environmental Manager (EM)***

Develop and annually update a Berry Bros. Pollution Prevention Plan and pursue the goals set forth in the Pollution Prevention Plan in accordance with the EM,

Records Plan. The Pollution Prevention Coordinator is the custodian of the Berry Bros. Pollution prevention Plan.

Ensure that Berry Bros. complies with applicable regulations, policies and procedures regarding pollution prevention.

Appoint a Pollution Prevention Coordinator within EM to develop, implement, and maintain the Berry Bros. Pollution Prevention Plan.

Distribute copies of the Pollution Prevention Plan to managers, and to those involved in pollution prevention projects and activities, and to others as requested.





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Establish and maintain a Berry Bros. Pollution prevention Team as necessary to accomplish Pollution prevention goals and objectives. This team will be led by the Pollution Prevention Coordinator.

**SUBPART I - AIR COMPLIANCE**

The Clean Air Act (CAA) is the comprehensive Federal law that regulates air emissions from area, stationary, and mobile sources. This law authorizes EPA to establish National Ambient Air Quality Standards (NAAQS) to protect health and the environment. The goal of the act was to set and achieve NAAQS in every state by 1975. The act was amended in 1977 and 1990. The setting of maximum pollutant standards and New Source Performance Standards was coupled with directing the States to develop State Implementation Plans applicable to industrial sources in the State.

Emission sources such as paint booths, sandblast facilities, fuel-burning equipment, boilers, fuel tanks, generators, and degreasers that initially require individual construction permits are included in a Title V permit issued by State Agencies. Berry Bros. policy is to comply with all CAA laws and regulations.

***Responsibilities of the Environmental Manager (EM)***

- Provide guidance as necessary to those facilities and operations responsible for processes that produce air emissions, in order to stay within the air permit guidelines or regulated emissions standards.
- Develop and maintain a Risk Management Program (RMP), as named.
- Ensure that all [company] facilities comply with all EPA and State air permitting and RMP requirements.
- Maintain a current copy of the Title V Permit
- Initiate necessary corrective action as required by the EPA and/or State in the event of noncompliance.

***Responsibilities of Facility Managers***

- Implement air permitting compliance activities.
- Replace regulated substances with non regulated substances, where possible. This includes paints, solvents/cleaning solutions, and any other Hazardous Air Pollutant (HAP) or Ozone Depleting Substance (ODS).



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- Notify the EM of new or replacement air emission sources.
- Notify the EM of any changes in quantities of liquid hydrogen, liquefied natural gas, or propane stored on-site for which the [company] is responsible. As processes are added that use one of these chemicals, the organization shall notify the EM immediately.
- If an RMP is needed at a specific [company] facility, as determined by the EM, provide information to the EM in support of the development and implementation of the RMP.

## **SUBPART J - STORM WATER AND WASTEWATER COMPLIANCE**

The Clean Water Act (CWA) is a 1977 amendment to the Federal Water Pollution Control Act of 1972, which set the basic structure for regulating discharges of pollutants to waters of the United States. The law gave EPA the authority to set effluent standards on an industry basis (technology-based) and continued the requirements to set water quality standards for all contaminants in surface waters. CWA makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit (NPDES) is obtained under the act.

The 1977 amendments focused on toxic pollutants. In 1987, CWA was reauthorized and again focused on toxic substances, authorized citizen suit provisions, and funded sewage treatment plants (publicly owned treatment plants) under the Construction Grants Program. CWA provides for the delegation by EPA of many permitting, administrative, and enforcement aspects of the law to State governments.

Berry Bros. General Contractors, Inc. maintains a water quality compliance program to achieve and maintain compliance with CWA and EPA and State water quality requirements. The NPDES and the SID permits regulate Berry Bros. Wastewater Management, which includes storm water runoff and industrial waste discharge. These permits are issued by the State and are renewed at 5-year intervals.

### **GUIDELINES**

Only the EM storm water inspector is authorized to release storm water from containment areas



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### ***Responsibility of the Environmental Manager***

Provide contractor storm water inspector(s) to regularly inspect designated storm water inspection sites at designated intervals as detailed in the [company] Storm Water Management plan.

Provide required training for personnel required to implement management practices and retain documentation of such training, which shall be made available for inspection by a State or EPA official.

Identify potential sources of storm water and wastewater pollution.

Notify the user of new sources identified within the user's designated area of responsibility and provide oversight and guidance for making sewer connections

Control the discharge of industrial wastewater and ensure compliance with the NPDES and SID permits.

### ***Responsibilities of Facility Managers***

Comply with all NPDES and SID permit conditions. Failure may result in fines, civil or criminal penalties, or other legal enforcement actions.


Cooperate with the EM storm water inspections.

Train Berry Bros. personnel regarding the proper operation of equipment and processes associated with the following sources: USTs and ASTs, hazardous waste/material storage areas, IDW, storage yards, construction activities, erosion, sandblasting, materials handling/fueling areas, equipment parking and maintenance areas/mobile equipment, vehicle washing and maintenance activities, painting and paint removal operations, aboveground pipelines, and buried pipelines.

Identify potential sources of storm water and wastewater pollution to the EM.

Design proper sewer connections for appropriate activities and discharges.

Notify the EM of any additions or deletions to the list of storm water inspection sites in the user's area.

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Notify the EM whenever changes occur at the facility that could affect storm water quality.

## **SUBPART K - TOXIC SUBSTANCE MANAGEMENT**

The Toxic Substances and Control Act (TSCA) of 1976 was enacted by Congress to give EPA the ability to track the 75,000 industrial chemicals currently produced by or imported into the United States. EPA repeatedly screens these chemicals and can require reporting or testing. TSCA supplements other Federal statutes, including CAA and the Toxic Release Inventory under EPCRA. Berry Bros. addresses the applicable regulations regarding asbestos, lead, and Polychlorinated Biphenyl (PCB) management to prevent illness to employees and damage to the environment from the use, removal, and disposal of toxic substances.

### ***Responsibilities of the Environmental Manager***

1. Support the regulations regarding asbestos, lead, PCBs, etc., and their effect on the environment.
2. Provide guidance on the requirements of Federal, State, and Local environmental regulations.
3. Provide guidance and oversight on the disposal of asbestos containing material (ACM), lead, and PCBs, as well as air, water, or soil pollution issues.
4. Ensure proper disposal of lead and PCB wastes.
5. Maintain a tracking system of asbestos and lead abatement or encapsulation projects and maintain records on each abatement project including location, cost, State notifications, and asbestos landfill receipts.
6. Ensure that building occupants and employers are properly notified in advance of, during, and following the completion of asbestos abatement work or any activity that disturbs ACM.
7. Ensure notification of scheduled asbestos abatement to facility occupants, the Building Manager, and/or the facility safety representative.
8. Ensure that ACM that may be disturbed in any renovation and maintenance activities is identified in the scope of work and removed only by qualified asbestos abatement or maintenance workers.
9. Coordinate approval of abatement projects with occupational health services.
10. Verify that asbestos related work is performed in accordance with all applicable regulations such as work site barriers and posting of warning signs.



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11. Verify that all contractor employees have completed necessary training including any specialized asbestos and lead abatement training as specified by OSHA and perform 10-day notifications to the State as required.
12. Review and approve job-specific procedures for all abatement projects for compliance with applicable regulations.
13. Manage and administer a medical surveillance program for applicable civil service and on-site contractor personnel.
14. Provide training, fit testing, and certification of personnel requiring the use of respiratory protection equipment.
15. Provide applicable air monitoring, air/bulk sample collection, identification, and analyses, including transmission electron microscopy, of potential ACM as required and for asbestos-related projects performed by onsite contractors, and maintain asbestos bulk and air monitoring results.
16. Provide monitoring, as needed, during abatement projects to ensure compliance with regulations.
17. Provide oversight to asbestos-related activities performed by offsite contractors.
18. Provide guidance on the requirements of Federal, State, and Local occupational and environmental health regulations.
19. Perform clearance inspections and monitoring following abatement activities.

**RESPONSIBILITY OF FACILITY MANAGERS**

Each facility shall immediately report environmental concerns related to asbestos, lead, PCBs, etc., to the Environmental Manager's Office.

**SUBPART L - CERCLA**

Congress enacted CERCLA, commonly known as Superfund, on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad Federal authority to respond to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites.
- Provided for liability of persons responsible for releases of hazardous waste at these sites.



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- Established a trust fund to provide for cleanup when no responsible party could be identified.

CERCLA also enabled the revision of the National Contingency Plan (NCP), which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List.

The Superfund Amendments and Reauthorization Act amended CERCLA on October 17, 1986. The guiding principal of the CERCLA program is the protection of human health and the environment. The program consists of actions that address: (a) potential releases that may contribute to off-site migration, primarily through ground water; (b) on-site releases that may have a potential for exposure to on-site workers; and (c) the most environmentally sensitive areas on Berry Bros. The goals are as follows:

- Investigate and eliminate risks to human health and the environment.
- Protect and satisfy the public.
- Meet regulatory requirements.
- Minimize adverse effects on [company] operations. The implementation of these goals is managed through the program's Site Management Plan (SMP).

### ***Responsibilities of the Environmental Manager***

- Ensure compliance with CERCLA
- Maintain a current copy of the SMP.
- Identify CERCLA sites, determine appropriate methods of remediation, and initiate the remediation process.
- Review construction design drawings to ensure proposed construction is appropriate for the site as determined by the Memorandum of Agreement (MOA) for Land Use Control (LUC) CERCLA sites and allowable access as determined by CERCLA.
- Ensure that proper spill reporting has been completed.

### ***Responsibilities of Facility Managers***

- Notify the EM of any potentially contaminated site(s). The Environmental Protection Agency maintains the list of contaminated sites



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- Coordinate construction of facilities at locations of CERCLA sites with the EM.
- During construction activities, notify the EM of unidentified odors, discoloration, or any suspected areas of contamination. Call 911 for reporting suspected dangerous situations.
- Notify the EM of spills so that reporting requirements can be evaluated.

## **SUBPART M - THREATENED AND ENDANGERED SPECIES**

The Endangered Species Act provides a program for the conservation of threatened and endangered plants and animals and their habitats. The U.S. Fish and Wildlife Service (USFWS) of the Department of the Interior maintains the list of endangered species and threatened species. Species include birds, insects, fish, mollusks, reptiles, mammals, crustaceans, flowers, grasses, and trees. The law prohibits any action, administrative or real, that results in a "taking" of a listed species or that adversely affects habitat.

Berry Bros. seeks to protect threatened and endangered species, both flora and fauna. When proposing a project, a [company] representative will consult with the USFWS and the State Department of Conservation regarding the potential to affect threatened and endangered species.

### ***Responsibility of the Environmental Manager***

- Ensure that threatened and endangered species are protected.
- Provide awareness training as necessary to designers, construction, and maintenance personnel.
- Obtain biological assessments and opinions as required to support construction/maintenance activities at Berry Bros. facilities. This process typically takes 90 days.
- Implement formal consultation process to obtain regulating agency approval for actions with potential impact to threatened and endangered species.

### ***Responsibility of Facility Managers***

- Ensure that program information is made available to personnel responsible for design, construction, and maintenance activities.



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- Notify the EM immediately if threatened or endangered species are encountered during construction and/or maintenance activities and immediately suspend activities.
- Avoid site construction activities, if practicable, in areas known to contain threatened and endangered species.

**SUBPART N - WETLAND PERMITTING PROCEDURES**

Two types of permits are administered by the U.S. Army Corps of Engineers (USACE) Section 404 program under CWA: (1) Individual and (2) General (Nationwide or Pre-discharge Notification). The type of permit and the length of internal review depend on the nature of the projects and the type and extent of wetlands affected.


For projects involving potentially significant impacts, authorization usually must be sought through an application for an individual permit. The individual permit requires detailed information about the project and its potential effects on the environment. The information in the permit application is reviewed by several regulatory agencies including the USFWS and the National Marine Fisheries Service (NMFS). In addition to the regulatory review, the individual permit application undergoes a public notice review that is scheduled for 30 days but may be longer if comments are significant.

The nationwide permit is the type of general permit used for common, minor construction projects that will occur in a localized area but are similar in scope throughout the nation, such as the construction of an underground pipeline that crosses wetlands, construction of road crossings through wetlands, and discharges into wetlands located above headwaters.

***Responsibilities of the Environmental Manager***

- Ensure that construction projects and/or maintenance activities impacting wetlands are permitted.
- Determine whether a general permit or individual permit must be obtained from the USACE.
- Review, approve, and submit permit applications Maintain wetland maps.
- Ensure that all requirements in a wetland permit are effectively implemented.



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***Responsibilities of Facility Manager***

- Ensure that construction projects and/or maintenance activities are identified to the EM in a timely manner so that permits can be obtained to meet established schedules. (Typically, the EM will require 120 days advance notice to meet construction/maintenance schedules.)
- Implement any required mitigation specified in a wetland permit.
- Provide necessary data as requested by the EM for the wetland permit application.

**GUIDELINES**

If less than 0.1 acre of wetlands will be impacted, the action may be covered under the nationwide permit.


If greater than 0.1 acre and less than 0.5 acre of wetlands will be impacted, the EM shall coordinate with regulating agency before proceeding with action.

If greater than 0.5 acre of wetlands will be impacted, the EM shall proceed with obtaining permit.

**SUBPART O - PESTICIDES**

The primary focus of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is to provide Federal control of pesticide distribution, sale, and use. EPA was given authority under FIFRA to study the consequences of pesticide usage and to require users (farmers, utility companies, and others) to register when purchasing pesticides. Through later amendments to the law, users also must take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by EPA. Registration ensures that pesticides will be properly labeled and that if used in accordance with specifications, will not cause unreasonable harm to the environment.

Berry Bros. maintains safe, effective, and environmentally sound pest management pursuant to FIFRA to prevent or control pests that may adversely impact the health of personnel or damage structures or property.

	<p align="center"><b>Berry Bros. General Contractors, Inc.</b>  <b>Corporate Policy Procedure</b></p> <p align="center"><b>(HSE) Health, Safety &amp; Environmental</b>  <b>Policies and Procedures Manual</b></p>	
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***Responsibility of the Environmental Manager***

- Inspect pesticide storage facilities to verify that the pesticides are stored properly, to verify that equipment is in working order, to review where chemicals are mixed, and to confirm that records on pesticide management and use are maintained.
- Maintain MSDS's for the pesticides used at Berry Bros. facilities.
- Exercise oversight and review of pest management activities throughout Berry Bros. facilities.
- Conduct onsite reviews of the Berry Bros. pest control program on an annual basis.
- Provide management support and resources sufficient to ensure effective implementation of pest management.
- Ensure that all pesticide applications are made only by properly trained and licensed personnel.
- Ensure that all pest control is performed in accordance with Federal, State, and Local environmental laws and regulations. All contractors shall maintain on-site all application records and these records shall be available for inspection by Government and other environmental inspectors at all times.

**GUIDELINES**

To ensure good air quality, employees shall not use pesticides for indoor office plants.

**SUBPART P - PROGRAM RECORDS**

1. Hazardous Waste Personnel Training records shall be maintained by the employer for at least 5 years then disposed.
2. Hazardous and Controlled Waste Generator Training records for contractors shall be maintained by EM for 2 years then disposed.
3. HAZWOPER Training records of training and certification shall be maintained by the employer for at least 5 years. Incident Command Training records shall be maintained by the employer for at least 5 years.
4. Storm Water Training records shall be maintained by EM for 3 years.
5. Storm water inspection records shall be maintained by EM for 3 years, and then destroyed.
6. Chemical Inventory Training records shall be maintained by EM for 2 years.



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**ENVIRONMENTAL MANAGEMENT**

- 7. Air Compliance Awareness Training records shall be maintained by EM for 3 years.
- 8. Spill Prevention, Control, and Countermeasures Training records shall be retained by EM for 3 years.
- 9. Asbestos and lead abatements records shall be permanently maintained by the Environmental Manager.
- 10. Chemical inventory database is to be maintained for at least 3 years, and then disposed.

Revision Date: 10/16/14

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Approved By: Joe Berry & Safety Committee

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