



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

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

Section # 22 A

Doc # SWP – 22 A

Revision: 0

Issue Date: 02/21/2008

Page: 1 of 19

Approver: Joe Berry

ENVIRONMENTAL WASTE MANAGEMENT SYSTEM

CONTENTS	SUBPART
PURPOSE	A
SCOPE	B
RESPONSIBILITY	C
DEFINITIONS	D
COMPANY GOALS	E
COMPANY PROCEDURES AND PRACTICES	F
WASTE CHARACTERIZATION	G
SELECTING, LABELING, MANAGING AND INSPECTING CONTAINERS	H
RECORDKEEPING AND REPORTING	I
FORMS	J

SUBPART A- PURPOSE


Berry Bros. General Contractors, Inc.'s main focus is protecting the environment with waste management being the main goal by reducing the amount of generated waste at the source wherever possible. In the event source reduction is not feasible, recycling options will be the secondary goal. Berry Bros. mission is to eliminate the wastes requiring treatment and/or disposal to the best of our ability. For those products where elimination is not possible, only environmentally sound disposal and recycling processes will be utilized.

Employees will be trained on the proper waste disposal methods by only those who have the credentials and experience to do so.

SUBPART B- SCOPE

This policy applies to all areas of operation for Berry Bros. General Contractors, Inc. where waste may be generated.

Subpart C- Responsibility

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 02/21/2008		Section # 22 A
Page: 2 of 19		Doc # SWP – 22 A
Approver: Joe Berry		Revision: 0
ENVIRONMENTAL WASTE MANAGEMENT SYSTEM		

Health, Safety and Environmental Personnel

1. Assist in obtaining applicable permits, exemptions, authorizations, or registrations for waste disposal from all BBGCI locations.
2. Advise or assist in waste management and waste minimization activities as needed.
3. Assist in training of employees on the requirements of waste management and waste minimization programs and or procedures.
4. Periodically audit all disposal/recycling procedures to ensure all divisions are in compliance with BBGCI disposal procedures.

Management and Supervisors


1. Ensure that any waste generated is managed and disposed of in accordance with local, regional, and federal requirements.
2. Provide additional instructions to employees to ensure everyone is aware of the requirements and BBGCI procedures.

Employees

1. Follow all policies and procedures pertaining to waste management and minimization.

Subpart D - Definitions

1. *Aboveground Storage Tank (AST)* – A vessel or container intended for extended duration of storage that is placed above the surface.
2. *Containment Storage Area* – An area with an impermeable surface and secondary containment.
3. *Contaminant* – An element or compound that contaminates a matrix or medium (causes it to be impure).
4. *SDS* – Safety Data Sheet includes information concerning the chemical hazards, safe handling, storage and disposal.
5. *Waste characterization*- a method used to determine the types of materials being discarded in a waste stream and in what proportion. Waste characterization information can help policy makers and city planners reduce landfill waste, set up recycling programs, and conserve money and resources. In fact, a waste characterization study typically precedes waste diversion studies and strategies.
6. *Non-Regulated Waste* – Any waste that is not regulated by the local, regional, or country agencies. These wastes generally have few, if any, management or


	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 02/21/2008		Section # 22 A
Page: 3 of 19		Doc # SWP – 22 A
Approver: Joe Berry		Revision: 0
ENVIRONMENTAL WASTE MANAGEMENT SYSTEM		

disposal requirements. However, they must be managed and disposed of in accordance with sound environmental and safety practices.

7. *Recycled Material* – Any by-product, material, or piece of equipment which is no longer useful for its intended purpose but is used again after reclaiming or reprocessing. Recycled materials are not considered waste.
8. *Regulated Waste* – Any waste that is regulated by any government agency. These wastes require management and disposal in accordance with local, regional and or country requirements.
9. *Secondary Containment* – A means of collecting or holding liquids around a tank or in a storage area. Secondary containment should have a holding volume of at least 110% of the largest container in the storage area.
10. *Toxic* – Of, relating to, or caused by a toxin or poison. Toxins are substances that cause either permanent or reversible injury to the health of a living thing on contact or absorption. A poison is a substance that causes injury, illness or death of a living organism.
11. *Container* - An object that can be used to hold or transport something.
12. *Treatment Plant* – A plant, facility, or unit into which wastewater is discharged or transferred for the purpose of removing contaminants.
13. *Waste* – Any material, product, or piece of equipment that has served its useful purpose and is to be disposed of.
14. *Hazardous Waste* - is a waste with properties that make it potentially dangerous or harmful to human health or the environment. Hazardous wastes can be liquids, solids, or contained gases. They can be the by-products of manufacturing processes, discarded used materials, or discarded unused commercial waste products.

Subpart E - Company Goals

1. To use the minimum amount of hazardous and maximum non-hazardous waste products as possible.
2. To replace hazardous waste products with non-hazardous waste products whenever possible.
3. To eliminate or alter processes that generate hazardous waste so that hazardous waste is not generated and/or minimized to the fullest extent.
4. Manage stocks to prevent expiration.
5. To ensure that all processes that generate hazardous waste are designed to ensure that only minimal amounts are generated.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 02/21/2008		Section # 22 A
Page: 4 of 19		Doc # SWP – 22 A
Approver: Joe Berry		Revision: 0
ENVIRONMENTAL WASTE MANAGEMENT SYSTEM		

6. To ensure that hazardous materials that are used are recyclable and/or returnable to the supplier. Our objective is that we generate as little waste as possible and none that requires disposal.
7. To ensure that only waste generated by our firm at our facility through pre-approved processes is the only waste accepted or located at our facility.
8. To demonstrate genuine concern for the environment through our actions.
9. To train all employees upon initial hiring and annually thereafter on the duties, functions, and hazards related to the area they are working in.
- ~~10. To ensure that employees who are first aid/CPR certified become fully aware of the correct sequence of notifying the proper authorities in the case of an incident.~~
11. All material shall be properly stored and handled in a manner that will reduce the chances of impacting the environment. Extra precautions shall be taken when work is being performed outdoors such as covering electrical units and eliminating potential run-offs.

Subpart F- Company Practices and Procedures

Drums

1. The contents of a drum shall be clearly labeled at all times using company labeling procedures specified in the Hazardous Communication Program.
2. Drums are to be completely emptied before returning to the work or collection area. A drum is considered empty if it has less than 1 inch of residue.
3. Empty drums that once contained hazardous substances are to be returned to its supplier. Suppliers not willing to accept the return of empty drums shall not be used. Disposal of drums will be performed in accordance with local and state requirements.
4. Drums containing non-hazardous waste that are full need to be stored in a storage containment area and disposed of by a 3rd party waste management company when the containment area is full.

NOTE: Marine Division- Once a drum that contains hazardous or non-hazardous materials is full and sealed off, the foreman of that vessel will bring the drum/drums to the docking service at BBGCI yard and contact the Yard Supervisor for disposal.

5. Only emptied drums that contained non-hazardous substances can be rinsed and utilized for other purposes. All original labels shall be removed and the drum shall be clearly labeled for the intended use of that drum. Drums that contained



	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 02/21/2008		Section # 22 A
Page: 5 of 19		Doc # SWP – 22 A
Approver: Joe Berry		Revision: 0
ENVIRONMENTAL WASTE MANAGEMENT SYSTEM		

hazardous substances CAN NOT be rinsed out for other use since the rinse water becomes a hazardous waste and the drum can still be contaminated.

6. Bungs are to be re-installed on drums after each use and after the container has been emptied to prevent rainwater contamination. Seals shall remain secure at all times.
7. Drum inspection and inventory will be completed monthly as part of the normal facility inspection process.

Used Antifreeze and Solvents

1. Used Antifreeze shall be stored in a drum and recycled. Once the drums are full and sealed, they will be stored in a designated containment storage area and picked up by a third party.
2. Any solvents that contain chemicals that are considered hazardous, shall be managed according to the SDS and regulatory requirements. The solvents should not be used unless the process specifically required its use and is approved by the HSE Manager.

Paints

1. Paint related solvents can be either hazardous or non-hazardous and is to be handled in accordance with the appropriate SDS.
2. Avoid using paints and varnishes requiring the use of lacquer thinners and alcohol if possible.
3. Avoid the purchase of paints containing EPA hazardous substances, and/or ensure that only minimal required amounts are contained within the paints.
4. Paints are labeled with expiration dates. Paint stocks are to be rotated to prevent expiration.
5. All waste from paint and solvents shall be carefully poured into a drum labeled as hazardous or universal waste. **Make this two items (paint latex vrs oil/solvent based and solvents)**

*NOTE: Dry Dock (Marine) - The dry dock in Berwick, LA is BBGCI's primary painting outfit. The OES 20 Solvent Recycling System is utilized to recycle solvents associated with the paint solution they utilize. The left over paint will be dried out and disposed of as non-hazardous waste while the solvents will be recycled into a labeled drum. **Should all paint be disposed of here?*

6. Once the drum is full and sealed, the date shall be placed on the label and must be placed at an accumulation point within three days. Once placed in the



	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 02/21/2008		Section # 22 A
Page: 6 of 19		Doc # SWP – 22 A
Approver: Joe Berry		Revision: 0
ENVIRONMENTAL WASTE MANAGEMENT SYSTEM		

accumulation area, the drum must be removed in accordance with state and federal regulations.

7. All paint waste will be removed by a third party contractor unless it is dry paint.
8. Used paint cans are to be emptied, dried, smashed and are to be disposed of as ordinary waste.
9. At no time shall paints, thinners or other hazardous materials be dumped on the ground or into the surrounding waterways, creeks, bayous or any worksite.
10. At no time will waste paints, thinners, rubber, plastic, wood or any trash be burned.
11. Only non-reusable paint related waste is to be accumulated in the paint waste drums.
12. Containment barriers shall be erected whenever necessary and feasible to prevent accumulation of airborne contaminants such as dust and overspray outside the area.

Disposal of Latex paint (Added by mike G)

1. Here's how to dispose of latex paint without taking it to a recycling center.
2. Stir the cat litter into the paint until it thickens and will not spill.
3. Let the paint dry and harden in the can.
4. Throw the dried paint in the can in the garbage.
5. **Oil-based paints are considered hazardous waste and must be taken to a recycling center**

APPROVED DISPOSAL VENDOR: the following company is contracted to dispose of solvents and hazardous waste.

**ABC Disposal
Anywhere usa
236/.256.26598**

Spent Abrasion and Blasting Agents

- ~~1. Blasting should be minimized to that of new construction to prevent contamination of spent abrasives.~~
- ~~2. Spent abrasives generated shall be managed in accordance with regulatory requirement **what are the requirements?** and requires HS&E approval for disposal and or expansion purposes.~~
- ~~3. Spent abrasive found to be hazardous **(how)** will be handled as such and shall be reclaimed for use or disposal. In the event that spent abrasive needs to be~~



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

Section # 22 A

Issue Date: 02/21/2008

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

Doc # SWP – 22 A

Page: 7 of 19

Approver: Joe Berry

Revision: 0

ENVIRONMENTAL WASTE MANAGEMENT SYSTEM

disposed, it shall be placed in a properly labeled drum and collected by an approved third party (~~NAME THE VENDOR AND CONTACT INFO~~).

4. Containment barriers shall be erected whenever necessary and feasible to prevent accumulation of airborne contaminants such as dust and overspray outside the work area. (Per Joe B)

Used Motor oil and Lubricants

1. Used motor oil and lubricants are to be recycled.
2. All used motor oils and lubricants are to be dumped into a designated container and labeled as used oil, and brought to the storage containment area.

~~NOTE: Marine Division – All vessels are equipped with an oil tank which is located inside the barge. When the tank is full, the used oil will be pumped into used oil drums and brought to the Yard Supervisor for proper disposal.~~

3. Bungs and seals are to be maintained on waste drums at all times to prevent contamination.
4. All drums containing waste shall be collected by an approved third party (Omega Waste – Berwick Yard : Crystal Clean – Pecos yard).

Batteries

1. Batteries will be recycled and returned to the vendor where new batteries have been purchased. Core charge credits will be applied to the company.
2. Any used batteries shall be placed on a designated pallet and secured until they can be returned to the vendor or recycled by an approved third party contractor.
3. ~~If possible, all batteries will be recycled.~~

Interstate battery

Drip Pans

1. Drip pan, catch basins, sumps, etc. are to be utilized whenever necessary to avoid contamination of soil and/or waterways.
2. Drip pans containment areas shall be maintained in good condition, have no leaks, remain plugged at all times and shall be cleaned out as frequently as necessary to prevent overflow or contamination to surrounding areas.

Oil Filters, Oily Rags and Absorbent Pads

4. Oily rags and absorbent pads shall be placed in a drum labeled "Oil Rags". ~~If dried up then ordinary waste.~~ (continue to treat all Oily bins as hazardous Joe B)



	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 02/21/2008		Section # 22 A
Page: 8 of 19		Doc # SWP – 22 A
Approver: Joe Berry		Revision: 0
ENVIRONMENTAL WASTE MANAGEMENT SYSTEM		

2. Once the drum becomes full, it will be disposed of by a third party contractor.
3. Oil filters will be gravity drained in a pan to remove all residual contents for an amount of time sufficient to ensure that all free-flowing oil is removed. Once drained the oil filter can be recycled as scrap metal waste or disposed as ordinary waste.

Solid/Non-Hazardous Waste

1. All trash, rubbish or debris is to be disposed of as **ordinary waste** in trash can or dumpster and **CAN NOT** be buried or burned.
2. Once the trash bin is nearing capacity, an approved third party contractor will be contacted for removal.


Scrap Metal

1. All scrap metal shall be placed in designated recycling bins/locations
2. Once the recycling bin is nearing capacity, an approved third party contractor will be contacted for removal.

Empty Aerosol Cans

Empty aerosol cans are considered hazardous waste shall not be disposed as ordinary waste UNTIL all remaining contents have been released using the following methods:

1. If aerosol cans will be disposed of without any recycling steps, then the can must be separated from ordinary waste, stored in a separate container/trash bin. The disposal of the can must be treated as hazardous waste and the company must use an approved third party contractor must be contacted from removal.
2. Since most aerosol cans **are considered hazardous waste under the Resource Conservation and Recovery Act (RCRA). A commercially available aerosol recycling system may be used to turn empty aerosol cans into recyclable steel.**
3. The can must be punctured and remaining contents released into a drum using a commercially available system. There will be a drum with a device on the top where you will insert your can and pull the lever causing the can to be punctured and any remaining contents will be released into the drum. Instructions will be attached to the puncturing device.
4. After the can has been punctured and the contents have been released into the drum, **the empty spray can is then** considered non-hazardous waste and will be placed in the appropriate trash bin.

	<p align="center">Berry Bros. General Contractors, Inc. Corporate Policy Procedure</p> <p align="center">(HSE) Health, Safety & Environmental Policies and Procedures Manual</p>	
<p>Issue Date: 02/21/2008</p>		<p align="center">Section # 22 A</p>
<p>Page: 9 of 19</p>		<p align="center">Doc # SWP – 22 A</p>
<p>Approver: Joe Berry</p>		<p align="center">Revision: 0</p>
<p align="center">ENVIRONMENTAL WASTE MANAGEMENT SYSTEM</p>		

5. The drum containing the waste from the aerosol cans shall be labeled as hazardous waste. Once the drum is full it shall be moved to the hazardous waste accumulation point and removed from the accumulation point within 90 days by an approved third party contractor.
6. If the contents of the paint do not contain hazardous material (oil based), then the residual paint may be disposed of as ordinary waste following disposal practices for used paint as specified above.

Light Bulbs Containing Mercury

1. Any light bulbs containing mercury are considered hazardous and cannot be thrown away in a regular trash bin.
2. A designated trash bin will be used strictly for light bulbs.
3. Once this bin is filled, it will be disposed of by a third party contractor as hazardous material.
4. All potentially hazardous Light Bulbs at the Berwick Yard have been replaced with environmental friendly LED bulbs.


Rubber Tires

1. At no time will rubber tires be burned, disposed of in a waterway or thrown away in a regular trash bin.
2. Tires shall either be sold, recycled and used for another purpose or disposed of by a third party contractor.

Subpart G- Waste Characterization

To safely manage hazardous and non-hazardous waste we must know the following:

- Know exactly what the waste contains
- How it will react
- What the properties are
- Toxicity
- PPE requirements
- Corrosive properties
- Reactivity

	<p align="center">Berry Bros. General Contractors, Inc. Corporate Policy Procedure</p> <p align="center">(HSE) Health, Safety & Environmental Policies and Procedures Manual</p>	
Issue Date: 02/21/2008		Section # 22 A
Page: 10 of 19		Doc # SWP – 22 A
Approver: Joe Berry		Revision: 0
<p align="center">ENVIRONMENTAL WASTE MANAGEMENT SYSTEM</p>		

Through waste characterization, one can learn if the waste is reactive or incompatible with other waste. Before putting waste into a container it is necessary to identify and segregate waste if they are not compatible and/or reactive. This is very important because incompatible and/or reactive waste must be stored in a manner to prevent fires and explosions. Refer to corresponding SDS sheets for additional information.

Subpart H- Selecting, Labeling, Managing and Inspecting Containers

Selection

Once the waste has been characterized and you know if the wastes are incompatible and/or reactive, then one can select an appropriate container. When selecting a container, one must consider the amount of waste and type (characteristics) of the waste. When selecting the container you must make sure that a waste won't react with the container itself. For example, a highly corrosive waste will react with a steel drum. The drum may fail and the waste be released. Use plastics or plastic-lined, steel drums to safely store corrosive wastes. To prevent drum failure, it is important to "match" the right waste with the right container.

Labeling

Whether you are dealing with hazardous or non-hazardous chemicals, at the minimum, your BBGCI will label each container/drum must be labeled with the type of waste the container/ drum contains as well as the date the container/drum was completely filled.

Labeling Hazardous Waste

Hazardous waste generators can only accumulate or store waste on-site for less than 90 days without a permit (180). The 90 day limit starts the moment the container is full. If the facility is a small quantity generator and you are shipping wastes over 200 miles, then you can store the wastes up to 270 days. If less than 200 miles, you can store the waste up to 180 days. You must be able to prove to inspectors that you have not exceeded the time limit for the accumulation.

The regulations require that you clearly mark on the container the date hazardous waste completely filled the container. In addition, you must clearly mark all containers holding hazardous waste with the words "HAZARDOUS WASTE". Besides the required markings, you will have to comply with all Department of Transportation (DOT) labeling requirements on the container before the waste can be shipped off site. The DOT label exactly identifies the waste, including name, characteristics and handling requirements.



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

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

Section # 22 A

Doc # SWP – 22 A

Revision: 0

ENVIRONMENTAL WASTE MANAGEMENT SYSTEM

(d) A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that:

- (1) The quantity of waste accumulated on-site never exceeds 6000 kilograms;
- (2) The generator complies with the requirements of subpart I of part 265 of this chapter, except for §§265.176 and 265.178;
- (3) The generator complies with the requirements of §265.201 in subpart J of part 265;
- (4) The generator complies with the requirements of paragraphs (a)(2) and (a)(3) of this section, the requirements of subpart C of part 265, with all applicable requirements under 40 CFR part 268; and
- (5) The generator complies with the following requirements:

(i) At all times there must be at least one employee either on the premises or on call (*i.e.*, available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (d)(5)(iv) of this section. This employee is the emergency coordinator.

(ii) The generator must post the following information next to the telephone:

- (A) The name and telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.

(iii) The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency


Managing Containers

In order to prevent spills, containers must be kept in good condition. In order for a drum to be considered in good condition, the drum shall be free from dents and corrosion, must not have any leaks and must not contain any bulges. IF any of these conditions are present, the container/drum must not be used.

In order to ensure all containers/drums stay in good condition, follow the following safe work practices:

- Keep containers closed at all times, except when adding or removing waste from the container.
- Be careful when handling the containers. Containers must be handled in a way as to prevent ruptures or leaks.
- If the container begins to leak or you notice any dents or bulges, transfer the waste to another container.

Inspecting Containers

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 02/21/2008		Section # 22 A
Page: 12 of 19		Doc # SWP – 22 A
Approver: Joe Berry		Revision: 0
ENVIRONMENTAL WASTE MANAGEMENT SYSTEM		

Container storage areas ~~must~~ **will** be inspected weekly. Inspections protect you, your company and the public. Through inspections, **BBGCI** can **help** stop spills before they happen. ~~The company should develop and maintain a standard inspection checklist to be used during every weekly inspection.~~ The checklist should be detailed and address the labeling and management procedures followed by the facility. At a minimum the inspection checklist should cover the following:

- Leaks or staining from containers.
- Container condition, including dents, bulging, and /or corrosion.
- Labeling – Start date, the words “Hazardous Waste” and other information.
- Management practice. Such as aisle space and stacking.
- **See “Waste Container Storage Area Inspection Checklist” at the end of this policy.**

Subpart I- Recordkeeping and Reporting


Permits, exemptions, authorizations, or notifications of waste management and/or disposal, as well as any correspondence with local, regional, or country agencies, must be kept on file at the facility. Some government agencies require very specific recordkeeping.

With respect to waste generation and disposal. Regardless of these government requirements, Berry Bros. General Contractors Inc. will keep track of waste generation and disposal for waste minimization assessments. This may be as simple as an accounting record of shipped waste that designates volume, type and destination of the waste or it may be a more complex system of specific waste manifests, transportation logs, certification of disposal/destruction, etc. For assistance in determining the recordkeeping and reporting requirements for a facility contact the corporate HSE Director.

Training of waste management will be conducted annually and/or whenever the supervisor and/or HSE department believes the information needs to be refreshed. Training records will document signatures of those trained, date of the training, signature of the trainer and an outline of the content covered.

Subpart J-Forms

Subpart K – Permits

	<p align="center">Berry Bros. General Contractors, Inc. Corporate Policy Procedure</p> <p align="center">(HSE) Health, Safety & Environmental Policies and Procedures Manual</p>	
<p>Issue Date: 02/21/2008</p>		<p align="center">Section # 22 A</p>
<p>Page: 13 of 19</p>		<p align="center">Doc # SWP – 22 A</p>
<p>Approver: Joe Berry</p>		<p align="center">Revision: 0</p>
<p align="center">ENVIRONMENTAL WASTE MANAGEMENT SYSTEM</p>		

List the permits you have here Need information from Mr. Lloyd

Air

1300 gallons of bulk hydrocarbon in 55 gal drums or larger SPCC Plan

Air Emissions permit or calculations to apply for a no exposure permit. Volume used over a years time.

If generated hazardous waste based on certain volume need to register as a small or large quantity hazardous waste generator. Don't need a permit if small quantity.

Aersol cans

Light bulbs in LA considered hazardous waste reach out to vendor to dispose of properly. In TX considered universal waste and not treated the same. Use green dot light bulb can be disposed of in the trash. Univar – BR Veolia Environmental – La place

Fuel transfer over water DOI – Coast Guard