



Section 12: Environmental Issues

1. Hazardous Waste Management

- 1.1 Contractors are responsible for the safe use and disposal of chemicals and hazardous materials brought onto EQ property in compliance with applicable laws and regulations, and for complying with applicable requirements for generators of hazardous waste.
- 1.2 Contractors that generate hazardous waste must comply with local, State and Federal regulations. No hazardous waste may be disposed in EQ waste containers. If there are questions, consult the EQ EHS manager for disposal directives.
- 1.3 Do not store more than 55 gallons of hazardous waste or one quart of acutely hazardous waste as defined in Part 261, Title 40, Code of Federal Regulations (40 CFR 261) without approval from the EQ EHS manager. Waste containers must be clearly labeled as to their contents. Waste must not be transferred between EQ facilities when it involves crossing or traveling on a public roadway without approval from EQ. Do not dispose of hazardous and chemical waste in company dumpsters.
- 1.4 Contractors that meet the qualifications of a conditionally exempt small quantity generator of hazardous waste as defined in 40 CFR 261.5, must coordinate the transfer of potentially hazardous waste to EQ for disposal. Contractors that do not meet the qualifications of a conditionally exempt small quantity generator are responsible for obtaining an EPA Identification Number and managing hazardous waste generated in accordance with applicable state and federal regulations. Contractors are subject to periodic inspections by the EQ EHS manager to ensure proper management, storage, and documentation practices are being followed.
- 1.5 The disposal of waste materials such as asbestos, lead paint, construction debris, or contaminated soil resulting from demolition, excavation, or maintenance activities that are not the result of hazardous materials or petroleum products brought on site by a contractor must be approved by EQ. These waste streams must be transferred or disposed of in accordance with written procedures approved by the EQ EHS manager.

2. Spill Prevention and Control

- 2.1 To minimize the risk of spills or releases to the environment, contractors must employ appropriate protective procedures such as double containment, overflow protection, employee training, and other measures as part of activities involving the use, storage, or handling of petroleum products or hazardous materials on EQ property.
- 2.2 Containers of hazardous materials and petroleum products should be stored in order to prevent releases to the environment. This requires selecting locations and methods to minimize exposure to rainfall, surface water, and the ground. Enclosures, shelters, and secondary containment should be used where appropriate. Containment pans should be placed under equipment where there is the potential for a leak or discharge. In the event that secondary containment is used in an area that is exposed to rainfall, the following requirements apply:
 - A. Prior to discharge of a containment system to the storm water system, inspect the primary container for signs of leakage and inspect the containment system by

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visual observation for color, foam, outfall staining, visible sheens, and dry weather flow. The discharge of a containment system that has evidence of contamination is prohibited.

- B. The responsible contractor must maintain a log indicating the individual making the observations, description of accumulated storm water, and the date and time of release.
- C. Submit a copy of the log to the EQ EHS manager.

3. Notification of a Spill or Release to the Environment

- 3.1 Most EQ sites are subject to government notification and reporting requirements when a petroleum product or hazardous material is spilled or released to the environment, including releases to the ground, surface water, sanitary sewer system, or air that are not specifically authorized by the company's environmental permits. A spill or release of a hazardous chemical or petroleum product must be cleaned up immediately.
- 3.2 The responsible contractor must notify EQ immediately, followed by a written incident report within 24 hours that includes the following information:
 - A. Description of the spill or release event.
 - B. Names of individuals involved.
 - C. Date and time of spill or release.
 - D. Copy of the MSDS for the material spilled or released.
 - E. Estimated quantity and type of material spilled or released.
 - F. Duration of the release.
 - G. Steps taken or planned to reduce, eliminate, and prevent recurrence of the spill or release.

4. Discharges to Storm water Conveyance Systems

- 4.1 A discharge to a storm water conveyance system refers to any discharge to a storm water drain, parking lot, ditch, loading dock, or ground that is not connected to a sanitary sewer. The following types of non-storm water discharges may be discharged to the facility's storm water conveyance systems:
 - A. Uncontaminated groundwater
 - B. Water from foundation drains and footing drains.
 - C. Air conditioner condensate without added chemicals.
 - D. Springs.
 - E. Uncontaminated potable water.
 - F. Waterline, sprinkler system, and fire hydrant flushings.
- 4.2 No other non-storm water discharges are permitted unless approved by the EQ EHS manager. Examples of prohibited activities include:
 - A. Discharging of rinse water from vehicle or equipment washing.
 - B. Discharging of treated water systems such as water fountains, cooling tower water, and water used to passivate piping.
- 4.3 An unauthorized or unpermitted non-storm water discharge is considered a release and must be reported and documented in accordance with the notification procedures described in Part 3, preceding.

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5. Erosion Control

- 5.1 Settling basins and/or straw barricading around storm sewers is required for ground breaking or any condition that could cause silt to enter a storm sewer.
- 5.2 A city, county, or state soil erosion permit may be required depending on the size and location of the area to be disturbed. The contractor shall confirm requirements and obtain any necessary permits prior to the start of work.

6. Open Burning

Open burning of debris on EQ property is prohibited.

7. Disposal of Waste in Sanitary Sewers

No hazardous materials, chemicals, or petroleum products may be disposed in sanitary sewers.

8. Asbestos

If material that contains asbestos is suspected or encountered, stop work immediately, notify the EQ representative, and proceed only after an asbestos plan has been approved.

9. Training

Contractors are responsible for training their employees on these procedures, and for maintaining training documentation.

10. Recycling

EQ encourages and supports recycling of materials when possible. At the start of work, contractors should prepare a recycling plan and submit it to the EQ representative.