

Environmental Sustainability Plan



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Effective Date: **5/1/2017**

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1. INTRODUCTION AND COMPANY BACKGROUND

H-2 Enterprises, LLC (H2E) is a privately-owned reclamation and construction company whose foundation is built on safety, integrity, precise execution and completion of challenging projects, and respectful collaboration with project owners. Over 300 years of combined experience; safely developing some of the nation's most progressive and challenging pipeline construction projects, makes H-2 Enterprises, LLC an innovative, flexible and dynamic pipeline construction company with the knowledge and resources to exceed your project goals.

You will find a team of individuals at H2E that are highly respected and experienced in the industry, bringing unsurpassed knowledge and innovative ideas to the growing and ever-changing pipeline construction world.

We are committed to facilitating an unequivocal safe and successful completion of pipeline projects of all sizes and complexity.

H2E has pledged that all work is executed in a way that will meet or exceed all of our client expectations. We are dedicated to exceeding industry standards for environmental issues and maintaining a culture within our company that has Safety and Environmental Management at the top of our list.

This Environmental Management Program (EMP) will describe the importance of Environmental Management in respect to Planning, Controls, Records, Training, Response and Improvements.

2. PURPOSE AND STATEMENT OF PROGRAM

2.1 Purpose:

This program is a general outline to promote awareness and responsibility among our employees while operating in accordance with environmental performance standards. Project specific plans are derived based on project location, regional regulations, and specific environment hazard identification and analysis.

2.2 Goal:

Zero Environmental Accidents.

2.3 Statement of Program Actions:

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- To assess and minimize the environmental effects of all of our operations and activities.
- To improve our performance in processes with environmental impact.
- To reduce the likelihood of environmental releases through the use of secondary containments, spill plans, and Best Management Practices (BMP).
- To maintain compliance with applicable environmental regulations and standards.

3. MANAGEMENT RESPONSIBILITY

The H2E Executive Team reviews and proposes new recommendations to our EMP to continually improve the program and to make certain of its continued success in the future.

3.1. Management Commitment

H-2 Enterprises, LLC. management strives to achieve these quality and business goals. The company executives show their commitment and support of the quality system as described in this program.

H-2 Enterprises LLC management will commit to purchasing products and acquiring materials that support Environmental Sustainability objectives, and continuously research and procure environmentally friendly products and services.

3.2. Client Focus

To best serve our customers, H2E Senior Management shall ensure that clients are satisfied with the services and products provided, and that the importance of meeting the clients' requirements along with statutory, regulatory and contractual requirements are communicated through the company.

3.3. Environmental Policy Standard

Management, in accordance with our organizational goals and the needs of our clients, has defined the policies and objectives for quality at H-2 Enterprises, LLC. All craft and staff personnel at H-2 Enterprises, LLC are committed to the quality of its processes, products and services.

H-2 Enterprises, LLC is devoted in upholding an Environmental Management Program that is in harmony with any promises made contractually and our Quality will not be diluted by such commitments. H2E ensures conformance to all requirements, whether they be statutory, Regulatory or contractual, while providing on time delivery, safely.

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The H2E Environmental Program is an essential component of our management procedure and is fully supported by the Executive Team. The Program's main goal is to place the building blocks for continual environmental protections, quality workmanship and client satisfaction.

4. ENVIRONMENTAL MANAGEMENT PROGRAM

4.1. General Requirements

H2E shall establish, document, implement and maintain an environmental program, while continually striving to improve its effectiveness. H2E's operating ideology emphasizes its focus on doing work safely and at the highest standard for reducing environmental impact.

This EMP is the bedrock of the core values H2E works under. The EMP covers all aspects of our work including planning, documentation, records, inspection and testing, materials, equipment, nonconformance, preventative and corrective action, subcontractor quality, internal audits, orientation, lessons learned and continual improvement. All H2E personnel are informed of the importance of quality in their work and the requirements of this EMP.

H2E shall exercise controls on any processes that are being outsourced to sub-contractors to ensure that the requirements are met, when applicable. The type and extent of control to be applied to these outsourced processes shall be defined within the quality management system.

H-2 Enterprises, LLC will comply with all local, state, and federal health, safety and environmental acts, laws, and ordinances, as well as with time proven and industry accepted safe work rules and practices.

4.1.2. Stop Work Authority

Any individual has the authority and obligation to stop or suspend a single work task, when the control of Health, Safety or Environmental risks are not clearly defined, established or understood without disciplinary action.

4.1.3. Requirements

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ALL employees are required to participate in this Environmental Management Program and follow the Emergency Response and HSE Management Plan.

4.1.4. Training Requirements

Ensuring compliance with OSHA or other regulatory requirements, all personnel share in the responsibility for environmental protections. Managers, Superintendents, and Foreman are responsible for the onsite actions of personnel within their charge. Each employee is responsible for their own actions and shall utilize safe work practices and comply with all environmental rules to protect themselves, the environment, the jobsite, and fellow workers in the performance of their duties. Safety is an operating function and cannot be transferred to a staff responsibility.

5. BEST PRACTICES & POLICIES

5.1 Soil Sampling

Best Practices and Methods approved by Certified Professional Soil Scientist (CPSS), and Certified Professional Agronomist (CPAg) shall be used to perform field services when applicable or required.

5.2 Spill Prevention

- Spill prevention will be utilized for bulk liquid containment.
- Equipment fueling and servicing procedures will not be performed on topsoil.
- EPA practices will be followed in the event of an accidental spill.
- All teammates are trained in Spill Prevention, Cleanup, and Waste Management.
- All spills must be reported to H-2 Enterprises, LLC and to Client.
- Reportable spills will be handled by the contractor in accordance with state(s) of work location and EPA regulations.
- Fuel storage will be maintained safely and properly. Lids will be used on all containers.
- Spill Kits will be provided on site and in vehicles as required by the H2E standard PPE policy.

5.3 Solid, Non-Hazardous Wastes

- Construction debris and excess materials shall be disposed in a contained bag or canister.
- Trash containers must be covered at all times to prevent windblown litter and debris.

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- Employees must be instructed by contractor in segregation of hazardous/non-hazardous waste.
- All disposal activities must comply with federal and state regulations.

5.4 Hazardous Waste

- Any operations involving hazardous wastes that are conducted at treatment, storage, and disposal (TSD) facilities will follow standards and protocols of OSHA 1926.65. See Section 6 for Emergency Response Procedure.
- Any contractor generated waste i.e. fuels, oils, residue paint, will be cleaned and disposed of in compliance with all local, state and federal regulations.
- Employees will manage and reduce General Waste during pre-project planning, during reclamation activities, and post-reclamation/ cleanup activities.
- General Waste will be organized and separated to have the most minimal impact to the environment and material/supplies resources.
- The Reduce, Reuse, or Recycle Management System will be implemented at each jobsite
- Aerosol cans, oily rags, and waste lubricants will be segregated from non-hazardous trash.
- Any drinking vessels should be closed with a cap or lid, i.e. bottled water must have cap and any cups must have lids.

5.5 Wildlife/Game Hazards

- Employees are cautioned and required to know the territory where work is taking place. If any area is part of a wildlife reserve or game reserve where wildlife or hunters may be encountered, special precautions must be utilized.
- If encounters with hunters occur, use caution and remain calm. Do not aggravate any situation where weapons are involved.
- If wildlife is encountered either in natural state or in a trap, do not engage in touching the animal.
- Employees will conduct Environmental and Wildlife Hazard Identification and Control Assessment on a daily basis, during JSA-Tailgate to minimize or eliminate all impacts to local habitats.
- Employees will meet or exceed all Environmental Protection Agency standards and Laws required, and as directed.
- See Appendix A for information about hunting seasons in the project work area.

5.6 Greenhouse Gas Emissions

- An operating vehicle emits a range of gases from its tailpipe into the atmosphere, one of which is carbon dioxide CO₂ – the principal greenhouse gas that contributes to climate change.
- Employee Drivers will reduce the amount of time “idling” vehicles during work.
- Vehicle and Equipment “idling” is monitored through fleet intelligence and data systems.
- Some company Vehicle and Equipment contain advanced emission control technology.

- Managers and Supervisors will be required to address excessive and unnecessary “idling” behavior and provide monthly reports, as needed.

5.7 Energy Conservation

- All unnecessary equipment, energy sources, or facility power equipment will be shut down when not in use.
- Building and facilities will have timed de-energy lighting fixtures to reduce and conserve energy.
- Technology Tools and Equipment will have sleep modes configured at time of issue.

5.8 Water Conservation

- Equipment Operators using water, i.e. Water Trucks, Hydrovac Trucks will recycle unused non-potable water at the end of each use, work cycle or end of week close out.
- Non-potable water will be conserved at site location, yard maintenance location or home office and be stored for future use, as needed.
- All tanks and drums containing water will be inspected to ensure that zero leaks or spills occur at any time.
- Where applicable, all indoor facilities will have timed faucets to reduce unnecessary water runs.

6. EMERGENCY RESPONSE PLAN

H-2 Enterprises, LLC will work with key personnel to ensure Emergency Action Plans are in accordance with facilities where applicable. Please refer to H2E Safety Manual section entitled, Emergency Action Plan, Section 21. Site specific information is contained in the SSSP for each project.

6.1 Identified Emergency Events:

Adverse/ Severe Weather

Shutdown Requirements/Orders

Medical Emergencies

Hazardous Material Release

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In the event of a hazardous materials release, the Project Leader shall:

Identify the chemical, source and amount of release and extent of area exposed by the release. Assess the extent of potential hazards to employee health and the environment. If necessary, notify the Project Supervisor to implement a Work Area Evacuation, and/or coordinate the containment and cleanup of the release.

If required, notify the following for assistance:

- Local hazardous materials response agency.
- Spill removal service.
- Take all reasonable measures necessary to ensure that releases, fires, explosions or other hazardous materials incidents do not occur, recur, or spread.
- Provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release.

HAZWOPER training will be facilitated if needed. Depending on the activities being conducted and the hazards present, employees will be HAZWOPER trained per OSHA's hazardous waste operations and emergency response standard 29CFR1910.120 and 1926.65.

In the event of a release, fire or explosion that results in potential health problems to adjacent facilities or environmental problems, the Project Supervisor shall immediately notify the HSE Manager and report the:

- Time and description of the incident.
- Chemicals released and estimated amounts.
- Extent of any injuries.
- Possible hazards to human health or the environment outside the facility.

The H2E HSE Manager shall be responsible for any reporting requirements to the:

- National Response Center
- State Emergency Response Commission
- Local Emergency Planning Committee (LEPC)
- Client Representative(s)

Emergency spill response kits shall be maintained by each Supervisor in sufficient quantities for adequate response to any emergency spill situation. The Emergency Spill Response Kits shall include:

- Absorbent material/neutralizers
- Plastic bags
- Protective gloves

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- Protective eyewear

NOTE: For further information on chemical spills/releases, see the Spill Response Plan, of the H2E Safety Manual.

7. INCIDENT REPORTING/ INVESTIGATION PROGRAM

H2E will be responsible to verbally report all incidents, accidents, spills, Near Hits and Safe Acts as defined in H2E's Incident Classification Guide to the designated onsite Client management team representative immediately as practicable.

All recordable injury/vehicle incidents, Major/Critical incidents and/or potential Major or Critical must be reported verbally client management team immediately including occurrences where individuals have been taken to a medical facility. (Provided in Site Specific Safety Plan)

H-2 Enterprises, LLC shall provide written reports of all incidents in a timely manner (within 24 hours of serious major or critical incidents).

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8. MANAGEMENT REVIEW:

The undersigned acknowledge the H2E Environmental Management Program:

Brent Huwa, Owner

Date

Doug Cook, Director

Date

Matt Baumgartner, Assistant Director

Date

JW Hoffman, Business Manager

Date

Steve Lutes, Director of HSE

Date

Susan Aldridge, Chief Legal Officer

Date

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9. Appendix

A: Wildlife Guide – U.S. State Programs

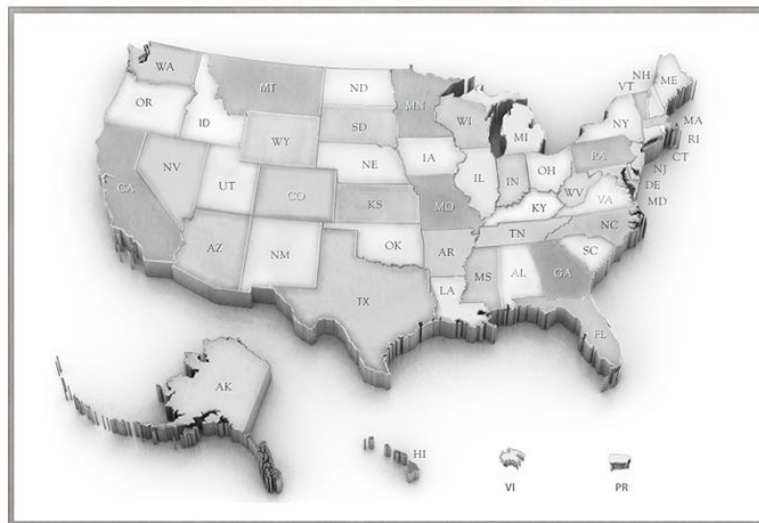
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Puerto Rico and Caribbean islands and the U.S. Virgin Islands

Reference: [Fish and Wildlife Service Headquarters offices. https://www.fws.gov/offices/index.html](https://www.fws.gov/offices/index.html)

Note: Complete Site-Specific Safety Plan (SSSP) will be submitted upon award of project with detailed locations based on KMZ file and construction locations by mile marker. SSSP will include environmental specifications regarding wildlife, watershed areas, spill prevention, emergency response and action plan.

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B. Safety Manual sections applicable to Environmental Program

Section 5	Hazard Communication
Section 10	Lead Exposure
Section 10B	Lead Awareness
Section 14	Hazardous Waste
Section 21	Emergency Action Plan
Section 31	General Waste Management
Section 32	Spill Prevention and Response
Section 36	Incident/Accident Investigation
Section 43	Stop Work Authority
Section 44	Hydrogen Sulfide
Section 49	Asbestos Removal
Section 52	Cadmium and Hexavalent Chromium
Section 61	Silica Control Plan
Section 64	Gas Hazards
Section 71	Transportation of Hazardous Materials