

Braton Construction Ltd. & Braton Properties Ltd.

ENVIRONMENTAL POLICY

Environmental Management Plan
Environmental Rules for Sub-Contractors

Document Reference	EMP 005
Date	05/05/10

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1.0 Scope

- 1.1 These Environmental Rules for Sub-Contractors define the standards required of all Sub-Contractors, their employees, and other contractors engaged by them when required to undertake work for ? on all contracts.
- 1.2 The rules contained in this document cover the key environmental issues subject to legislation. Site specific precautions are given to Sub-Contractors at the site induction.

2.0 Definitions

- 2.1 ? hereinafter known as the “Company”, have produced these rules to apply to all contract sites. The term “Management” means the Contract Manager or any other member of the Company’s staff to whom responsibility has been delegated.
- 2.2 The term “Sub-Contractor” means any organisation, sole trader or person who undertakes work on site for ? and is not a direct employee of the Company. It also includes all contractors who may be engaged by other sub-contractors on sites controlled by ?

3.0 Introduction

- 3.1 ? is registered to ISO 14001, the International Standard for Environmental Management, and operates to the requirements set out therein.
- 3.2 The Company seeks to comply with all legislation pertinent to environmental management and require all Sub-Contractors to conduct their work in such a manner that unnecessary risks and disturbance to the environment are avoided, by employing Best Practice Options to minimise risks.
- 3.3 Compliance with the requirements of this Environmental Management System (Plan) EMP 020 is a condition of employment on all Contracts and is important in the prevention of an Environmental Incident and legal action being taken against the Company and or its Sub-Contractors.
- 3.4 The Management at each contract site is available to clarify and explain the application of these Rules to the Sub-Contractor

Compliance by Contractors & Staff to the following sections is mandatory.

4.0 Storage and housekeeping of fuels, oils, paints, and chemicals

Please ensure that your staff are made aware and adhere to the following as Sub-Contractors will in the event of a pollution incident be responsible for all remedial costs including the compliant disposal of contaminated soil.

- 4.1 Sub-Contractors must ensure that fuels, oils, paints, and chemicals are kept in leak proof containers, and retained in a secure store in the compound. Site storage units must have a bunding facility to prevent spillage escaping from the store.
- 4.2 Move only minimum quantities of fuels, oils, paints, and chemicals to other areas of the site.
- 4.3 Where practical, refuel / refill in storage areas or compound.
Refuel using funnel or nozzle.

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- 4.4 Do not allow diesel / fuel to spill on to the ground whilst refuelling.
- 4.5 If fuel spillage occurs, inform Management immediately. Mop up using a spill kit (oil-absorbent pads)
- 4.6 Sub-Contractors must not leave unused fuel, oil, paints, or chemicals on site.
- 4.7 Sub-Contractors must dispose of oil and used oil filters as Hazardous Waste. Plant fitters must remove used oil and oil filters from site when plant is serviced.
- 4.8 COSHH - Sub-Contractors must adhere to the advice and requirements in product data sheets with regards to the storage, use, and the safe compliant disposal of chemicals and paints.
- 4.9 Sub-Contractors must ensure that bulk diesel tanks are fully banded, including a banded facility for the hose, couplings, and nozzle. If a tank is not self-banded, a band must be constructed, be impermeable, and capable of retaining at least 110% of the tank volume. Filler handles to be trigger, spring type, and suspended within the band when not in use.

Sub-Contractor to ensure that valves and filler handles are padlocked when not in use.

5.0 Management of Waste

Waste Contractors, including Sub-Contractors hauling waste material off site, must assist ? to meet their duty of care, waste requirements.

- 5.1 Contractors / Sub-Contractors must provide a copy of their Waste Carrier's License to ?.
- 5.2 ? must receive a copy of all Hazardous Waste Consignment Notes and Waste Transfer Notes, and ensure that waste is stored, packed properly, and disposed of compliantly.
- 5.3 Sub-Contractors hauling waste must arrange for a member of ? staff to visit the final disposal site and ensure that waste is suitably disposed of by a licensed operator.
- 5.4 Sub-Contractors' employees must put all litter into bins or skips provided. It is an offence to litter the environment. Avoid creating wind blown litter.
- 5.5 Sub-Contractors must ensure that Hazardous Waste such as oil, oil filters, grease cartridges, chemicals, paint, and partially empty containers containing oil, chemicals, or paint must not be thrown at random around the site or deposited in the general waste skip or bin. Sub – Contractors must remove the same from site and dispose of in a compliant manner. ? will maintain a clearly marked receptacle for Company related items
- 5.6 Chemicals used for cleaning, ie, solvents or turpentine used to clean paint brushes, must not be emptied down the drain. Sub-Contractors must supply a container for storing used paint or paint brush cleaning chemicals, and dispose at a licensed waste disposal site. It is possible to hire equipment for cleaning paint brushes and other plant and therefore no need to risk pollution. The washings are contained in a sealed unit. (See also 4.8)
- 5.7 Sub-Contractors must ensure that batteries are not left on site or in the site compound. These contain acids which are classified as special waste. Batteries must be stored in a banded container, to retain spillage of acids, and kept in a secure store, or removed off site and disposed of properly using the appropriate consignment note.
- 5.8 Asbestos is classed as Hazardous Waste, and must only be handled by a Sub-Contractor who is licensed to deal with this material. Sub-Contractors employed on a site where asbestos is being removed by a licensed Sub-Contractor must adhere to the rules laid down by Management

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- 5.9 If a Sub-Contractor discovers unidentified or unusual material on site, advice / guidance must be sought from Management. Remember, if in doubt – ASK.
- 5.10 Sub-Contractors must not burn waste material – Mandatory.
- 5.11 Sub-Contractors must ensure that waste skips are properly netted before leaving site.
- 5.12 Sub-Contractors must ensure that trucks are not overloaded or have debris protruding over the sides of the trucks.
- 5.13 Sub-Contractors transferring waste material must ensure that access roads are kept clean. Wheel washes must be used when necessary.
- 6.0 Watercourses**
- 6.1 Sub-Contractors must ensure that pumps do not discharge directly into watercourses. Allow water containing suspended solids to filter through long grass, filter drain, straw bales, or settlement lagoon. Arrangements must be made to ensure that water being pumped is separated from mud or silt, ie, raise suction hose from bottom of sump; filter water entering sump, etc.
- Water entering a watercourse must be clean. It is advisable to place a pump at least 10m away from a watercourse to minimise pollution from accidental fuel or oil spillage.
- 6.2 Sub-Contractors must not discharge drainage (temporary or permanent) to a watercourse, including site run-off, until the pollution protection proposals have been agreed with the appropriate statutory body.
- 6.3 Sub-Contractors must ensure that plant is not operated in, or driven through a watercourse without the written permission from Management and the appropriate statutory authority.
- 6.4 Sub-Contractors must ensure that fuels, oils, paints, and chemicals are stored away from a watercourse to prevent the risk of contamination.
- 6.5 Vehicles and tools belonging to a Sub-Contractor must be washed if permitted in designated areas only and not in or beside a watercourse or drainage system.
- 6.6 Any release of liquids to land will eventually reach watercourses, either on the surface or below ground. Sub-Contractors must ensure that care is taken to prevent this happening.
- 6.7 Sub-Contractors must ensure that any spillages are reported to Management immediately, and attempts made to contain and remove it following the emergency procedure outlined in the site induction training.
- 6.8 Sub-Contractors must not wash out concrete delivery trucks beside a watercourse, or drainage system leading to a watercourse. (See also 6.10)
- 6.9 Sub-Contractors must consult with Management, and ensure that concrete delivery trucks are if permitted washed out in a designated area as far as possible from a watercourse. Concrete wash is alkaline and contains suspended solids that destroy marine life. (See also 6.10)

6.10 On certain sites it may not be practical, the risk may be too high, or the Client may forbid washing out concrete trucks. It is therefore important to observe the site rules regarding this activity. These rules will be clarified at site induction.

6.11 If the following is applicable - Liaise with Management before proceeding
When cleansing or swabbing water mains with chlorus, **do not** discharge the chlorinated water directly to controlled waters (stream, watercourse, river) or drains leading to controlled waters. Chlorinated water can destroy marine life. Discharge the chlorinated water to long grass, and allow to filter.

7.0 Plant - Equipment

7.1 Sub-Contractors must ensure that their plant is regularly maintained to avoid unnecessary leaks of oil and fuel, and excessive emissions of fumes and noise.
All Plant /Equipment that is not in accordance with the above - fit for purpose, will not be able to operate on a ? Site

7.2 Plant operators employed by Sub-Contractors must carry emergency spill kits in their machines.

7.3 Engines must not be left running needlessly to avoid unnecessary fumes –Air Pollution.

7.4 Sub-Contractors must ensure that their plant is suitably silenced or muffled – Noise Pollution.
Site Lighting must be positioned to prevent a nuisance and or blind motorists – Light Pollution

7.5 Sub-Contractors must ensure that items of plant are serviced on a hard standing to avoid - Land Pollution. (See also 5.5)

8.0 Wildlife

8.1 It is illegal to knowingly disturb nesting birds.
Sub-Contractors must ensure that their employees are made aware of the above information.

8.2 All care should be taken to avoid disturbance to wildlife. On certain sites, any sightings of badgers, otters, bats, deer or owls must be reported to Management.
Details will be provided at the Site Induction.

8.3 Sub-Contractors must ensure that harmful substances are not released into the environment, since wildlife may be affected.

8.4 Litter can be hazardous to wildlife and should be disposed of carefully according to the waste management plan for the particular site.

9.0 Vegetation -

If Japanese Knotweed / Himalayan Balsam or other pernicious plants are present or detected stop work and consult with management immediately.

9.1 Sub-Contractors must avoid polluting the land or vegetation with fuels, oils, chemicals, or wastes.

9.2 Sub-Contractors must ensure that damage is not caused to existing vegetation which will remain at the end of the works when unloading, manoeuvring, etc.

9.3 Do not damage, disturb, or remove any vegetation unless it is a specific requirement in a method statement. If in doubt, ask Management.

9.4 Access to a site, and areas within a site, must only be by designated routes. Sub-Contractors must ensure that their employees are aware of this information.

9.5 Sub-Contractors must confine their works to within the site boundary.

10.0 Noise

- 10.1 Sub-Contractors must ensure that plant and equipment have properly operating silencers / mufflers.
- 10.2 Sub-Contractors must not leave plant and other vehicles / machinery running needlessly.
- 10.3 Consider the placement of noisy plant in order to minimise nuisance to nearby houses, motorists, and wildlife.
- 10.4 Sub-Contractors must ensure that noise levels and working hours for the site are observed.

11.0 Dust

Dust pollution is a nuisance to the local neighbourhood- people and the environment - plants & animals. ? and its Sub-Contractors must minimise dust creation and release.

Sub-Contractors must observe the following:-

- 11.1 Dampen down dust creating operations. (Examples - demolition / stone – tile cutting).
- 11.2 Avoid creating unnecessary dust.
- 11.3 Cover materials that could create dust when windy.
- 11.4 Ensure that vehicles leaving site do not leave mud on the road.

12.0 Fire - **Material of any description cannot be burned on site.**

Dry grass and scrub vegetation can catch fire very easily at all times of the year and particularly in periods of dry weather.

- 12.1 Smoking if authorised will only be in a designated outdoor location.
If permitted - Ensure that all cigarette ends and matches are properly extinguished before disposal.
- 12.2 Sub-Contractors must become acquainted with the location of fire fighting equipment.
Ask if you do not know.
- 12.3 The emergency procedure will be implemented in the case of fire. Sub-Contractors will be provided with this information at the site induction.
- 12.4 If you see a fire on site or adjacent to the site take action immediately, following the emergency procedure, and inform Management.

13.0 Archaeological and Historic Finds

It is possible that during construction activities some object or feature of interest may be uncovered. If any bones, coins, or objects of possible historic interest are uncovered Sub-Contractors should observe the following rules:-

- 13.1 Stop work and inform Management.
- 13.2 Do not remove any objects from the site.

14.0 Spillage Response

The most likely incidents to occur on ? projects will include silt, oil, concrete, grout, cement, and chemical contamination of watercourses, and contamination of land with any oils, chemicals and construction products.

- 14.1 It is the responsibility of Sub-Contractors to try and prevent a pollution incident worsening. Stop or reduce the flow of diesel, engine oil, or hydraulic oil.
- 14.2 The Sub-Contractor must contain the incident using a spill kit (absorbent pads), sand or by digging a containment bund.
- 14.3 The Sub-Contractor must report the incident immediately to Management, explaining the nature, cause, and location.
- 14.4 Ground contaminated with oils or harmful chemicals must be excavated and disposed of as Hazardous Waste at the Sub- Contractors expense.
- 14.5 Do not dig grips / ditches to drain polluted matter to watercourses.
- 14.6 Sub-Contractors must not ignore or try to cover up any incidents as this could lead to a prosecution against your organisation – financial penalties imposed by the regulator can be very expensive dependant on the incident

15.0 Discipline

Adherence to all the afore mentioned Site Rules is Mandatory

? Management reserves the right to immediately dispense with the services of a Sub-Contractor in the event of wilful neglect or contravention of these Rules.

Such action will also result in the Sub-Contractor concerned being deleted from the Company's list of Approved Sub-Contractors.

16.0 General

- 16.1 Sub-Contractors must consider Environmental Control when compiling Method Statements and Risk Assessments.
- 16.2 ? Integrated Management Policy is available to the Sub-Contractor for information.
- 16.3 Food Related Waste – Lunches.
Sub-Contractors must ensure that their personnel on site do not discard food related waste at random around the site. .

If you are unsure of Environmental Requirements - ASK!

ENVIRONMENTAL RULES AGREEMENT RECORD

Please complete this form, and return it to

Environmental & Quality Officer at

I, (Name).....
on behalf of (Company Name)

....., have read and understood the Environmental Rules and confirm that our activities on will comply at all times with these requirements.

I also undertake to communicate and enforce these rules with all relevant employees and contractors under my control.

Date:.....

Signature:

Position:

Company Address:
.....
.....
.....

Telephone:.....

Fax:.....

Email:.....

The attached is the environmental rules we comply with on most of our sites for the main contractors/clients.

Braton Construction Ltd & Braton Properties Ltd. your civil engineer partner.