



Environmental Program

1. **Purpose.** To provide guidance to B&D Boilers personnel on compliance with applicable environmental regulations. This sheet is provided as a quick reference to locate specific environmental documents retained by B&D Boilers.
2. **Scope.** Applies to all employees, and operations of B&D Marine and Industrial Boilers, Inc. Although other contractors and sub-contractors may use B&D Boilers documents as a reference (after receiving written approval from the B&D Boilers' Environmental Program Manager), B&D Boilers environmental documents will not be used as the sole source of information for decision-making.
3. **General Company Environmental Policy.** B&D Marine and Industrial Boilers is committed to continued excellence, leadership, and stewardship in protecting the environment. Protection of the Environment is both a primary managerial responsibility as well as an individual responsibility of every employee. Each employee is to provide the same commitment to Environmental Protection that the employee has for worker safety.

In order to implement this policy, our corporate objective is to minimize waste first, rather simply manage the production of waste. Our desire is to achieve minimal adverse impact on the air, land, and water through an excellent Pollution Prevention Program.

4. **Pollution Prevention Program.** B&D Boilers policy is to conduct a three-step, prioritized, approach to Pollution Prevention. This approach allows waste to be minimized at the source in order to maximize the beneficial impact to the environment and the company. These steps are as follows:
 - a) **Source Reduction.** B&D Boilers employees are to only purchase enough supplies/ hazardous materials to perform the contracted job. **No materials are to be purchased to remain on-hand in storage without the approval of the Environmental Program Manager.** When purchasing materials, buyers should seek to purchase either **recycled**, or **reusable** materials that are capable of doing the job. The buyer should also attempt to purchase the most **“environment friendly” alternative material**, when purchasing materials for a job.

If purchase of these types of materials requires significant additional costs, then management – including the Environmental Program Manager – will be contacted for approval of the purchase decision.

- b) **Reuse, recycling, reclamation.** Materials left over from a job are to be **reused**, to the maximum extent possible, at the next appropriate job. This includes partial containers of leftover paints, acids, cleaners, etc.

Waste materials capable of being **recycled** (e.g. metals) will be transported back to the B&D Boilers facility for appropriate storage in the recycling containers. B&D Boilers will make every effort to identify new recyclers to receive wastes that are presently discarded as trash. These recyclers shall be used to the maximum practicable extent possible.

Waste that contains materials that can be **reclaimed** (e.g. silver-containing photographic solution) shall be transported back to the B&D Boilers facility for processing.

- c) **Treatment.** Wastes that can be legally treated on-site at B&D Boilers shall be managed in such a manner. This includes treating metal contaminated industrial wastewater from cleaning operations, and neutralization of virgin acids (if necessary).

5. **Environmental Media Program Areas and Responsibilities.**

- a) **Air** – Boilers and space heaters with ≥ 1.5 Million Btu/Hr rated input capacity and burning virgin fuel require a **construction permit** prior to erection and an **operating permit** prior to firing up the boiler. Boilers burning anything other than virgin fuel (i.e. waste oil) require permitting no matter how small the unit.
- b) **Wastewater** – B&D Boilers' Wastewater Pretreatment Permit #039 issued by the North Charleston Sewer District, shall be strictly followed with regards to bulk industrial wastewater disposed of at the B&D facility on Meeting St. The Special Conditions for this permit, as authorized by the South Carolina Department of Health and Environmental Control on July 28, 1997, shall be strictly followed (e.g. Operation of Clarifier Pre-Treatment Unit by a licensed Class C operator – Class D for weekends, disposal of precipitated sludge in a properly licensed landfill, and maintenance of a Best Management Practices Plan).
- c) **Solid Waste** - All solid waste shall be identified, separated, and properly disposed of in accordance with SCDHEC R.61-79.260 to 265. Solid Wastes classified as Hazardous Wastes by RCRA shall not be transported over public roads by B&D Boilers personnel. Hazardous Wastes will be left with the customer after proper containerization, labeling, and storage. Unused and partially used materials capable of being reused and/or recycled shall be transported back by B&D Boilers personnel to the main facility, for appropriate reuse, renewal, or recycling.
- d) **Hazardous Materials** – All hazardous materials shall be segregated and stored properly in accordance with the company's Hazardous Material/Waste Management Plan, as well as the applicable regulations promulgated by the OSHA and DOT. Spills shall be cleaned up promptly, reported to management, then stored and disposed of properly.
- e) **Records and Upkeep.** All records of waste disposal actions shall be maintained for at least 3 years. Hazardous Waste Manifests, and associated documents shall be maintained indefinitely. The Hazardous Material/Waste Management Plan shall be updated at least every 2 years. In addition, an annual environmental audit shall be conducted for the company every 2 years, with the findings of the audit tracked and an appropriate compliance schedule maintained.