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# Brunel Energy, Inc.

## General Waste Management

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### 1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program to minimize waste generation as much as possible during construction and during day-to-day operations.

### 2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
  - 2.1.1. On or in, any Company or client property, including parking areas; or
  - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

### 3. Definitions

- 3.1. **Waste Management** includes the activities and actions required to manage waste from its inception to its final disposal.
- 3.2. **Waste Estimation** is the approximate estimate of the potential waste for each project.
- 3.3. **Common Waste** includes waste engine oil, hydraulic oil, and antifreeze.
- 3.4. **Waste Segregation** is the process of dividing waste into the appropriate waste containers and waste areas.

### 4. Responsibilities

- 4.1. Manager(s):
  - 4.1.1. Shall implement and maintain the procedures and steps set forth in this program.
  - 4.1.2. Review with operations to determine where waste can be reduced at its sources of generation.
  - 4.1.3. Ensuring employees have access to compliant waste containers, including proper containers for recycling.
- 4.2. HSE Supervisor(s):
  - 4.2.1. Shall assist management with implementing and maintaining the procedures and steps set forth in this policy.
- 4.3. Employee(s):

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4.3.1. Shall be responsible for separating defined waste types and placing identified waste materials in the appropriate containers.

4.4. Subcontractor(s):

4.4.1. Shall be responsible for separating defined waste types and placing identified waste materials in the appropriate containers.

## 5. Requirements

- 5.1. Governmental agencies, customers of the Company, as well as the owners or operators of a worksite, may have their own program requirements. These requirements may be applicable to the Company, its employees, and subcontractors.
- 5.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures.
- 5.3. Violation of these provisions or refusal to cooperate with implementation of the policy can result in the Company's barring contract personnel from Company facilities or participating in Company Operations.

## 6. Procedure

6.1. Common Waste

6.1.1. Waste engine oil, hydraulic oil, and antifreeze have experienced increased regulatory attention. In instances where such products are identified as common wastes. A bulk storage tank for waste oil should be obtained.

6.1.1.1.1. Bulk storage tank should be covered and placed in a spill pan.

6.1.1.1.2. Spills should be immediately cleaned up with oil absorbent.

6.1.1.1.3. Waste oil filters, oil absorbents and similar waste must be managed as "special waste" in many states.

6.1.1.1.4. Purchasing bulk oil, antifreeze, etc. in returnable containers (usually 55-gallon drums) may help minimize the disposal problem of empty containers.

6.1.1.1.5. Quart and gallon purchases should be in plastic containers that allow replacing the top which will prevent drip loss from the near empty container.

6.1.1.1.6. All drums should be covered and placed in drip pans in a manner which prevents deterioration of the container.

6.2. General Waste Management

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- 6.2.1. To reduce waste disposal, all operations shall make efforts to segregate waste for recycling or reuse.
- 6.2.2. Storage areas shall be kept orderly. Scrap and junk material shall be disposed of properly.
- 6.2.3. Oil, greases, paints and other flammable liquids and solids shall be stored in approved containers with proper labeling.
- 6.2.4. Trash/refuse generated by employees from their personal use and from Company activities shall be removed from the customer’s locations and disposed of properly. Enough receptacles shall be placed at the facility to accept the anticipated amount of waste.
- 6.2.5. Dumpsters, barrels, and other open-top receptacles shall be covered to exclude rainfall and to prevent storm water contaminants.

6.3. Waste Estimation

- 6.3.1. Each work site will estimate the project wastes, trash, and/or scrap materials that will be generated and taken into consideration prior to work being performed so the need for containers and waste removal, if necessary, can be determined.
- 6.3.2. Each site will utilize the following for planning of dumpster scheduling and total non-hazardous dry waste material. These figures do not include either recycling nor waste minimization efforts and reflect no use of an incinerator.

| <b>SAMPLE ONLY - SOLID WASTE</b>  |                            |           |           |           |           |            |
|---|----------------------------|-----------|-----------|-----------|-----------|------------|
|   | <b>Number of Employees</b> | <b>10</b> | <b>25</b> | <b>35</b> | <b>50</b> | <b>100</b> |
| <b>Total Estimated Square Feet of Waste (@ 0.675 cu ft per person daily)</b>      |                            |           |           |           |           |            |
| Daily   |                            | 7         | 17        | 24        | 34        | 68         |
| Weekly  |                            | 47        | 118       | 165       | 236       | 473        |
| Monthly (4.33 wks)  |                            | 205       | 511       | 716       | 1,023     | 2,046      |
| Annual  |                            | 2,455     | 6,138     | 8,593     | 12,276    | 24,551     |
| <b>Total Estimated Weight of Waste (@ 4lb per person daily)</b>                   |                            |           |           |           |           |            |
| Daily   |                            | 40        | 100       | 140       | 200       | 400        |
| Weekly  |                            | 280       | 700       | 980       | 1,400     | 2,800      |
| Monthly (4.33 wks)  |                            | 1,212     | 3,031     | 4,243     | 6,062     | 12,124     |
| Annual  |                            | 14,549    | 36,372    | 50,921    | 72,744    | 145,488    |
| <b>Number of Total Dumpster Fills 40 yard dumpster 7x8x22 = 1,232 square feet</b> |                            |           |           |           |           |            |
| Daily   |                            | 0.0       | 0.0       | 0.0       | 0.0       | 0.1        |
| Weekly  |                            | 0.0       | 0.1       | 0.1       | 0.2       | 0.4        |
| Monthly (4.33 wks)  |                            | 0.2       | 0.4       | 0.6       | 0.8       | 1.7        |
| Annual  |                            | 2.0       | 5.0       | 7.0       | 10.0      | 19.9       |

- 6.3.2.1.
- 6.3.2.2. Dumpster figures are based on a 40-yard container and can be modified if another size is used.
- 6.3.3. The Company must coordinate with the project site or owner to ensure proper disposal of waste or scrap materials.

6.4. Waste Segregation

- 6.4.1. Do not mix waste streams.
- 6.4.2. Only place waste in the designated container, satellite accumulation area (SAA), recyclable accumulation area (RAA), universal waste accumulation area (UWAA) or designated dumpster.

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## 6.5. Recycling

- 6.5.1. Waste should be recycled whenever practicable.
- 6.5.2. The Company will encourage proper segregation of waste materials to ensure opportunities for reuse or recycling occurs at each work site.
- 6.5.3. The collection of recycled material will reduce the total load on the environment.
- 6.5.4. Bins of sufficient size must be lined with a plastic bag and clearly labeled for use.
- 6.5.5. Posters from the Company will be posted throughout the work site to encourage recycling.
- 6.5.6. Collection bins will also be placed in administrative areas will follow the following color guiding:
  - 6.5.6.1.1. Blue – Paper
  - 6.5.6.1.2. Green – Aluminum cans
  - 6.5.6.1.3. Yellow – Plastic
  - 6.5.6.1.4. Cardboard will be flattened, staples and excess shipping tape removed.

## 6.6. Waste Handling

- 6.6.1. The handling, organization and storage of waste and scrap materials to minimize potential impact to the environment.
- 6.6.2. Waste materials shall be properly stored and handled to minimize the potential for a spill or impact to the environment.
- 6.6.3. During outdoor activities receptacles must be covered to prevent dispersion of waste materials and control the potential for runoff.

## 6.7. Storage Requirements

- 6.7.1. The Company must ensure project-related waste is stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees.
- 6.7.2. Proper waste receptacles must be provided for trash and materials that may be reused or recycled during a project.

## 6.8. Personal Protective Equipment (PPE)

- 6.8.1. For each site waste management plan the Company shall determine a PPE matrix that includes gloves, hand protection, eye, and face protection and/or other necessary PPE.

## 7. Training

- 7.1. Employees shall be instructed on managing waste upon initial assignment and when there are changes to the site-specific waste management plan. Proper disposal method of waste. Examples include:

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- 7.1.1. Instruction on the proper handling, storage and disposal of wastes and depending on the waste generated at the site to also include general instruction on disposal of non-hazardous wastes, trash, or scrap materials.
- 7.1.2. If waste generated is classified as hazardous then employees shall be trained to ensure proper disposal and compliance with regulations.
- 7.1.3. Segregation of waste, recycling opportunities / methods and proper PPE to be utilized.
- 7.1.4. Minimization methods to reduce waste.

## 8. Recordkeeping

- 8.1. Employee training records will be maintained in the corporate office.