



ENVIRONMENTAL POLICY STATEMENT

Environmental protection is considered to be an important and integral part of conducting business with Pollard Enterprises Ltd. One of the guiding principles is to take careful consideration to the environment in our everyday decision-making.

ENVIRONMENTAL POLICY

- Develop a project environmental action plan which commensurate with company standards and regulatory/client requirements.
- Minimize hazards to worker and public health.
- Maintain an effective reporting and communications system.
- Protect the environment from adverse effects of construction operations.
- Comply with all legislative and regulations of the environment.
- Provide education to participating personnel; enabling them to understand and share in the responsibility for monitoring and protecting the environment.
- Assess potential environmental risks.
- Evaluate and monitor environmental performance to applicable standards, work with industry, government, and other workers to maintain environmental awareness.
- Maintain an effective reporting system to upper management and supervisors.
- Pollard Enterprises Ltd. shall conduct a waste audit covering the waste that will be generated in the construction project. The audit shall also address the extent to which materials or products used consist of recycled or reused materials or products.
- The plan or a summary be posted at the construction site in a place where most of the workers will see it and;
- If a summary is posted, any worker who requests to look at the plan be allowed to do so. Reg. 102/94, s. 23.

ENVIRONMENTAL PROCEDURES

This environmental requirements manual is provided to you as an introduction to the rules and procedures required by each employee to implement and abide by when performing everyday duties.

It is the responsibility of all Pollard Enterprises Ltd. employees, contractors and sub-contractors to read, understand, comply with, and ensure everyone is trained on the rules and procedures set out in this manual.

The company reserves the right to terminate any employee for a single environmental or safety infraction, with or without prior notice.

DEFINITIONS

CONTAMINANT

Any solid, liquid, gas, odour, heat, sound, vibration or radiation resulting from human activities that may cause adverse effect on people, property or the natural environment.

DISCHARGE

Includes an addition, deposit, emission or leak.

ENVIRONMENT

Surroundings in which an organization operates including air, water, land, natural resources, flora, fauna, humans and their interactions. Surroundings extended from within the organization to the global system.

ENVIRONMENTAL AUDIT

The assessment of environmental performance against applicable laws, regulations, institutional policies, and operational procedures to provide evidence and assurance about all essential due diligence.

ENVIRONMENTAL IMPACT

Any change in the environment whether adverse or beneficial, wholly or partially resulting from an organization's activities, products, or services

ENVIRONMENTAL PROGRAM

A strategy to attain environmental goals. The program should identify:

- Fundamental environmental goals
- Environmental liabilities
- Compliance strategies, including environmental auditing, monitoring, record keeping, abatement and waste minimization initiatives

POLLUTANT

Any solid, liquid, gas and/or odour resulting directly or indirectly from activities that:

- Impair the quality of the natural environment for any use made of it
- Injure or damage property, plant or animal like
- Harm or materially discomfort any person
- Adversely affect the health or impair the safety of any person
- Render any property, plant or animal life unfit for use
- Cause the loss of enjoyment of the normal use of property; and/or
- Interfere with the normal conduct of business

A pollutant also includes any substance from which such solid, liquid or gas and/or odour is derived.

HAZARDOUS SPILL

A discharge of a pollutant made into the natural environment, which is the air, land or water of Ontario, from or out of a structure, vehicle or other container, that is abnormal in quantity in light of all the circumstances of the discharge.

OUR POLICY

General

1. Employees shall become familiar with applicable job-related environmental legislation and shall conduct Pollard Enterprises Ltd. business in an environmentally responsible manner.
2. No person shall discharge a contaminant into the natural environment and no person responsible for a source of contaminant shall permit a discharge into the natural environment in an amount, concentration, or level, in excess of that prescribed by Ontario's environmental regulations.
3. Every person who discharges a contaminant or is responsible for a contaminant that discharges into the natural environment, in an amount, concentration, or **level in excess** of that prescribed by the regulations, shall forthwith notify the Ministry of the Environment about the discharge.
4. Every person who discharges a contaminant into the natural environment that is **likely to cause** an adverse effect shall forthwith notify the Ministry.
5. The owner of the pollutant and the person having control of a pollutant that is spilled and that causes or is likely to cause adverse effects shall immediately do everything practicable to prevent, eliminate and improve these effects and to restore the natural environment.

Environmental Due Diligence

1. Pollard Enterprises Ltd. shall design and implement and audit their own environmental programs to conserve resources, minimize waste production, comply with environmental legislation, and promote operational environmental due diligence including routine monitoring, emergency preparations and reporting.
2. Management personnel shall establish systems and contingency plans where necessary to protect the environment, and shall see that these systems and plans are effectively operated and maintained.
3. Employees of Pollard Enterprises Ltd. shall be trained to respond effectively to environmental occurrences and to report remedial actions to supervisory personnel and government authorities. This training and instruction shall be a local or departmental responsibility.

4. Significant environmental issues and environmental due diligence initiatives shall be reported by senior supervisors/management personnel to Environmental Health and Safety to promote internal communications and other appropriate actions.

Guidelines

Pollard Enterprises Ltd. is committed to preventing pollution by regularly identifying, assessing, managing, and reviewing operational and research activities that may harm the environment. Pollard Enterprises Ltd. expects environmentally responsible behavior from within its organization and from all employees. All employees have a duty to report situations of concern to their immediate supervisors.

The ***Environmental Protection Act*** and its regulations, and local municipal by-laws apply to Pollard Enterprises Ltd. daily operations may impact the environment via air emissions, chemical storage, fuel storage, vehicle usage, and hazardous waste, use of ozone-depleting substances, hazardous material spills and sewer discharges. The law requires that all employees conduct their business with due diligence (i.e., with all reasonable care being taken).

Environmental Offences

Under the ***Environmental Protection Act***, every person who is convicted of a contravention of the Act or regulations or who fails to comply with an order or requirement of an inspector or director or an order of the Minister of Environment is liable to a fine or imprisonment. Individual supervisors, managers and workers can be charged and found personally liable. Pollard Enterprises Ltd. can also be prosecuted. The owner of the pollutant may also be liable for compensation to a third party for loss or damage arising from the adverse effects of the pollutant, spill or contaminant.

NOTE TO EMPLOYEES:

All employees are secure from reprisals when they report environmental concerns and Pollard Enterprises Ltd. expects to be informed of such matters without haste.

ENVIRONMENTAL CHECKLIST

1. Appointment of an on-site designate
2. A list of Contaminant Products
3. A substitution for less hazardous substances
4. MSDS or SDS for all on-site products/health hazard information
5. Ensure all environmental licenses and permits have been arranged for
6. Storage and handling of all harmful on-site products
7. Response Plan to on-site spill containment
8. Requirements for a spill containment kit
9. Emergency Response plan for an on-site spill event
10. Notification and Communication requirements
11. Preparation for an environmental inspection or audit

MINIMIZING WASTE

WASTE AUDIT AND WASTE REDUCTION WORKPLANS

WASTE AUDIT:

A waste audit is essentially a study relating to waste generated by our operations on a project. The crew foreman, in collaboration with the Pollard Enterprises Ltd. General Superintendent, shall measure and estimate the quantity and composition of waste that will be generated on the project.

A waste audit summary sheet shall be used to determine:

- a) Amount of waste generated
- b) Amount of material that can be reused
- c) Amount of material that can be recycled

WASTE REDUCTION:

Based on the waste audit summary information, the foreman in collaboration with the General Superintendent and Management will determine ways to reduce waste generated on the project. Such waste reduction planning will be developed before work starts at the project.

A waste reduction work plan summary sheet shall be used to determine:

- a) Material Category
- b) Weight of waste material
- c) Proposed action to be taken to: reduce, reuse or recycle materials
- d) Setting up of start times, end dates and progress status

Examples of the waste audit and waste reduction summary sheets to be utilized for these assessments are included in this environmental safety plan.

Minimizing waste is one of the first considerations in a successful environmental program and to environmental protection. Audits will be performed periodically and submitted for the waste that is generated during the construction period. This audit will identify recyclables that will be accumulated. (i.e. tar products and concrete, wrappings, wood, corrugated steel, cardboard, aluminum siding, copper, etc)

The purpose is to provide information on all on-site products and materials which may be hazardous and which are non-hazardous in nature for all personnel on site.

MSDS or SDS - MATERIAL SAFETY DATA SHEETS or SAFETY DATA SHEETS

Material Safety Data Sheets (or Safety Data Sheets) must be present on-site for all controlled products. The MSDS or SDS must be submitted before the controlled product is brought onto the site. These sheets must be kept current and readily accessible for review for any and all site personnel. MSDS sheets expire three years from supplier's preparation date. SDS do not expire. They are only updated once the manufacturer makes a change to the chemical composition of the compound they produce.

STORAGE AREAS

The Senior Superintendent will approve storage area locations for bulk hazardous materials. Any storage areas, which contain hazardous materials, will not be located in environmentally sensitive areas. All potentially hazardous products must be properly labeled and stored in designated safe and secure product storage areas which are protected from rain, wind, sun and unauthorized use. All products shall only be handled by persons who are trained and qualified in handling these products and shall be fully trained. (e.g. WHIMIS and Emergency Response Procedures)

FLAMMABLE LIQUIDS/OILS/PAINTS

Any flammable liquids, oils and glycols must be stored in a CSA approved container. All solvents and materials shall be stored in designated secure, ventilated areas away from the immediate work area. All contaminated or hazardous liquid wastes are to be stored in appropriate steel or plastic drums or tanks and sent for disposal in accordance with applicable federal and provincial legislation. All painting operations shall be carried out during calm weather periods (minimal wind) to minimize airborne paint particulate. Spilled paint or solvent shall be contained, cleaned up and disposed of in accordance with federal and provincial waste management. The Senior Superintendent must approve the storage location of all products such as solvents, thinners, urethanes etc., and shall not be left open;

covers shall be placed/replaced to ensure proper seal. Any spilled paint or solvent shall be contained, cleaned up and disposed of in accordance with federal and provincial waste management. All glycol, fuel, sanitary and storm lines shall be properly drained prior to their abandonment, with the contents being contained and disposed of in accordance with applicable environmental legislation and regulations. Any oily rags or rags contaminated with paint products will not be allowed to accumulate and they are to be stored in an approved self-closing metal container.

HAZARDOUS WASTE MATERIAL

In the event that hazardous wastes are found during the course of the work, ensure the hazardous wastes are segregated and properly disposed of by qualified hazardous waste removal contractors and in accordance with applicable federal and provincial legislation. All persons involved with the hazardous waste removal program and any persons working in the vicinity of the hazardous waste working areas shall exercise caution and wear protective equipment and clothing as needed. Arrange for proper dust and particulate control measures to prevent the release of hazardous materials.

ESTABLISHING WORK ZONES

Work zones shall be established for work areas and resulting materials:

1. CONTAMINATION AREA

This is the area where contamination does and could occur. Bulk storage of hazardous excavated material will be stored in this area. Personnel entering this area are required to wear the required personal protective equipment.

2. DECONTAMINATION AREA

This area provides a transition zone between contaminated and clean areas of the site. The decontamination area is to be located directly outside the contaminated area. Any personnel and equipment leaving the contaminated area will be decontaminated in this zone, if required.

3. CONTAMINANT FREE AREA

This is a contaminant free area and should be a safe distance away from the other two areas. Other measurements may be required to deem this area free of contaminants such as signage, protective clothing for the personnel who enter the area, special employee training/education.

EQUIPMENT MAINTENANCE/STORAGE/FUELLING

Any vehicles/equipment will not be parked or stored, especially after regular working hours, in environmentally sensitive areas. Cleaning of construction equipment in locations where debris is prevented from gaining access to storm sewers or watercourses. Trim loads to trucks hauling material from the site before leaving the site in order that no spillage of loads occurs.

Establish a procedure and a plan for fuelling and vehicle or equipment maintenance. A contingency plan for the interception and rapid clean-up and disposal of spills and obtain approval of such plan prior to starting work from the site superintendent.

Maintenance and repair shall be done, at the immediate work area. When repair activity must be conducted on-site, the following precautions **MUST** be followed:

1. Repair and maintain equipment in an area designated by the construction superintendent, keeping in mind that such areas shall be a minimum of 30 meters from a watercourse.
2. The maintenance and repair area shall be located such that no surface runoff will flow through the area.
3. Pollard Enterprises Ltd. shall equip the maintenance and repair areas with enclosed containers for the disposal of all refuse and non-hazardous waste resulting from the maintenance operation.
4. Pollard Enterprises Ltd. shall equip the maintenance and repair areas with spill control kits for spills and hazardous materials.

Petroleum products and allied petroleum products can be found in underground storage tank systems, aboveground storage tank systems and fuelling systems located on the construction site.

Precautions must be taken to prevent spillage during fuelling operations.

- All fixtures, hoses, nozzles and storage tanks shall be in good repair with no leaks
- All vehicles and tankers used to deliver or store fuel shall be CSA approved to store automotive fuel
- Refilling operations and storage tanks shall not be located within 30 meters of a waterway, sanitary or storm sewer, manhole or catch basin
- Oil changes must be done so that the oil is drained into a containment pan located on a leak tight tarp
- Any leak or spill of oil or fuel onto the ground must be reported immediately to the site Superintendent who will then take the appropriate action

EROSION AND SEDIMENT CONTROL

Proper erosion and sediment control measures shall be installed and maintained to minimize the loss of material to surface and subsurface drainage systems. Catch basins and manholes where potential for surface runoff exists will be protected by means of silt fencing and or straw bales. Surface runoffs will be directed to catchments basin. If applicable, the erosion on slopes will be addressed.

DRAINAGE

All water from dewatering operations shall be contained and discharged in a way that ensures that water quality and quantity objectives of the receiving storm or sanitary sewers systems are met. This may require the use of water treatment facilities or storm water management ponds.

Temporary drainage and pumping shall be provided, as necessary to keep excavations and site free from water. Utilize erosion and silt buildup controls as necessary. After ground and storm water in dewatering catchments basin has clarified and separated from solids and meets the solids and chemical contents of water criteria fro direct discharge into the storm sewer system stated by the authorities having jurisdiction, the contractor may pump and discharge the water into the storm water system.

Water containing suspended materials will not be pumped into waterways, sewers or drainage systems. All Environmental Laws for the disposal of effluent water containing solid and/or liquid contaminants will be complied with.

HAZARDOUS SPILL CONTINGENCY PLAN

A spill contingency plan is designed to provide the best response with the shortest possible time to protect people, property and the environment. To carry out these objectives, the plan must include mechanisms for initiating and carrying out the required notifications, spill containment, clean-up and remedial actions.

Spills or discharges of pollutants or contaminants under the control of any personnel shall be reported immediately and documented accordingly.

If the spill contains noxious vapour, evacuate immediately and keep unnecessary people away. If it is safe to do so, contain the spill by surrounding it with earth, sand or an approved commercial absorbent; cover or protect any catch basins in the immediate area from receiving any spilled contaminants. Reporting an incident of a spill should be determined if it is to cause or likely to cause any of the following effects:

- Impairment to the quality of the natural environment - air, water orland

- Injury or damage to property and animal life
- Harm or material discomfort
- Adverse health effects
- Impairment to safety
- Property, plant or animal like to become unfit for use
- Interference with normal conduct of business

Each reportable spill will be documented and submitted as required to the environmental regulatory agency. This report will include information on the cause of the spill and events leading up to it. The type and volume of the substance spilled will be noted.

Details of the containment, clean up, disposal and restoration operations will also be provided.

If any of the spills is of a solid, contain it by using barriers and control dust and particulates by covering it with tarp.

All spills of equipment fluids, cleaning fluids, fuels or other hazardous wastes must be cleaned up immediately and all contaminated materials, including soils, must be disposed of in compliance with applicable laws and regulations.

SPILL CATEGORIZATION

1. **Minor Spill** - a spill that does not cause significant adverse effects, or public concerns and that the spiller can utilize his own resources available to him, undertake the necessary measures to control, contain and clean-up the substance spilled.
2. **Moderate Spill** - a spill that causes or is likely to cause significant adverse effects in the immediate vicinity of the spill for which the resources provided may be required to effectively contain and clean-up the substance spilled.
3. **Major Spill** - an incident in which oil or other hazardous substance of such magnitude and nature as to require additional resources to those available from the responsible party.

EMERGENCY SPILLS ACTION PLAN

Under the ***Environmental Protection Act*** any spill of a pollutant is a spill. Of primary concern are those spills of pollutants, which are abnormal in quantity and quality. Reportable quantities for spills of hazardous and/or toxic substances vary widely. Therefore, there is no standard exemption. Therefore, if a spill of any quantity is detected, the site superintendent and/or Ministry of Environment must be notified to determine if formal notification is necessary.

In the event of a hazardous substance spill the site foreman will report the incident to the Pollard Enterprises Ltd. Spills Coordinator for further action.

SPILLS CO-ORDINATOR: Carlos Arezes Cell # 416-990-6425

SPILLS ACTION CENTER EMERGENCY PHONE NUMBER: 1-800-268-6060

EMERGENCY HAZARDOUS SPILLS RESPONSE

1. Ensure no danger to personnel - Evacuate them and secure the spill area.
2. Assess the situation and notify Pollard Enterprises Ltd. Spills Coordinator.
3. The Spills Coordinator shall assess the situation and report to head office senior staff. Depending on the nature and quantity of the spill, the Spills Coordinator will call the ONTARIO SPILLS ACTION CENTER and provide notification and other related information.
4. The Spills Coordinator shall begin containment of the hazardous spill with the assistance of the SPILLS ACTION CENTER DUTY OFFICER.
5. The Spills Coordinator shall notify the owner of the property if applicable.
6. Clean up efforts shall be carried out under the direction of the Pollard Enterprises Ltd. Spills Coordinator, the ONTARIO SPILLS ACTION CENTER and local authorities in charge.

All spills will be cleaned up in an environmentally acceptable manner such that the spill site is restored to its pre-spill condition, as reasonably expected. The clean-up requirement covers all spills of pollutants both reportable, and those exempt from reporting and those which are not abnormal in quantity or quality.

REMEDIATION

The clean-up will include the following actions:

- Securing the total spill area
- Filling drainage paths
- Containment of the spill
- Securing the source of the spill
- Secure open drains
- Deploy booms

- Deploy absorbents which are commercially approved for spills
- Clean-up as appropriate - transfer spilled substances, soils/water, used absorbents to tanks or drums
- Disposal of recovered spilled substance and clean-up materials; this disposal will require adherence to all applicable laws
- Restoration of the site

ASSESSMENT OF THE SPILL

Information, which will be used during the assessment of the spill:

- Location
- Substance
- Quantity
- Total quantity spilled (assessment of any further spillage)
- Surface area involved
- Hazardous materials involved (MSDS or SDS)
- Potentially stopping leak or contain the spill
- Criteria for containing the spill
- Required materials or equipment
- Weather conditions while counter measures are underway

INFORMATION REQUIREMENTS FOR NOTIFICATION

The following information will be required upon the notification of the spill:

- Spiller's company name
- Location of the spill
- Name of the caller and return phone number
- Type of incident
- Any injuries or casualties
- Substance or quantity spilled
- Quantity contained/released
- Time incident contained/released
- Time incident started/stopped
- Cause of spill
- Potential environmental impact
- Description of nature of containment and recovery actions underway
- Time clean-up will be completed
- Names of people/departments contacted

Appropriate measures will be taken to minimize such risks through:

- identifying harmful emissions from roof vent stacks and use the appropriate shutdown, respiratory protection, or isolation measures to protect workers.
- identifying roof substance content and if considered a designated or harmful substance, enact appropriate abatement measures to protect workers and public.
- minimizing entry of roof work fumes generated, by sealing intake vents into building or using mechanical ventilation to minimize fume entry.
- enacting an appropriate response to the spillage of any flammable or hazardous material on the roof or property grounds.

ASBESTOS AND OTHER DESIGNATED SUBSTANCES

Asbestos containing materials is present throughout many areas of the construction site. All construction that requires demolition, access into ceiling spaces or work performed on mechanical systems shall be carefully monitored and assessed prior to the commencement of work. A schedule and work plan detailing all asbestos abatement work will be required from the Contractor performing the work. Care must be taken to ensure exposure to asbestos is minimal or eliminated where possible. If friable material is discovered during any work, the workers will stop operations immediately. If any designated substances are encountered, the Contractor will immediately stop further disturbance and notify proper authorities.

NOISE REDUCTIONS

These precautions and measures consist of, but are not limited to the following:

- Efficient intake and exhaust silences on compressed air equipment
- Efficient intake and exhaust mufflers on internal combustion engines

The site superintendent will monitor the site for excessive noise and take necessary actions to control to a reasonable level wherever possible.

DUST AND DEBRIS CONTROL

Excessive dust and debris from construction activities creates a serious hazard for the operation of all regular activities on the construction site. During progress of work, provide measures to control dust and debris at all times.

Waste, loose material and debris, capable of causing damage should be contained at all times. Cover or water sprinkling of dry materials to prevent blowing dust and debris, temporary enclosures (tarps etc) or other suitable methods to prevent dust and debris arising and scattering into the air.

Excavated materials and exposed, unprotected cut faces shall be managed in a manner to minimize dust levels. Do not use water when it may create hazardous or objectionable conditions such as icing, flooding, pollution and ponding.

The contractor responsible shall clean up any debris ending up outside the site.

Maintain sufficient water, watering equipment and personnel on site at all times to control dust. This prevents blowing of the dust on and from the site, from paved and unpaved temporary roads and excavated areas by wetting.

Securely cover excavated and demolition materials being removed from the site and all fill materials being delivered to the site from becoming airborne of dust and debris.

This concludes our environmental safety plan strategy and we welcome any input by our employees or clients, on ways to improve this plan.