

EWP-007 EMS Awareness for Contractors

This instruction describes the TWMC environmental management system (EMS) as it pertains to contractors that conduct work at TWMC on behalf of TWMC.

Contents

Section Number	Section Name	Page Number
1.0	Environmental Management System (EMS) Overview	1
2.0	Applicable EMS Documents	2
3.0	Contractor Requirements	2
3.1	Records	2
3.2	Waste Management	3
3.3	Hazard Communications	3
3.4	Financial Responsibility	3
Appendix A	Definitions	4
Appendix B	References	4
Appendix C	Required Forms	4
Appendix D	Revision History	4

Instructions

The following is an overview of the TWMC EMS and a description of contractor requirements.

1.0 Environmental Management System (EMS) Overview

The TWMC EMS is designed to meet the requirements of the ISO 14001 standard. Accountability for the EMS belongs to all TWMC employees and those that do work on the behalf of TWMC. The following describes these responsibilities:

- a) As required by the ISO 14001 standard, TWMC will provide the necessary resources to implement, maintain and improve an EMS committed to compliance with applicable environmental laws, rules, regulations, policies, instructions, and other adopted requirements.
- b) All TWMC executives, directors, managers, supervisors, and employees are accountable and have a personal and corporate responsibility.
- c) TWMC employees will make efforts to improve the environmental performance of the facility and the activities that occur there.
- d) TWMC will develop and periodically evaluate environmental objectives and targets that prevent pollution, minimize waste, improve service reliability, and promote energy efficiency and cost savings.

EWP-007 EMS Awareness for Contractors

2.0 Applicable EMS Documents

TWMC has a number of instructions, work practices, and forms that apply to contracted activities. These cover the following topics and can be found on the TWMC Intranet:

- a) Monitoring, measuring, analysis, and evaluation. Records documenting contractor activities may become EMS records.
- b) Communications. Communications regarding the work activity may become EMS records in order to document the activity and/or its environmental impacts.
- c) Waste management. When wastes are created, they must be properly managed. See the Health, Safety, and Environmental Department (HSE) for more information regarding waste management at TWMC.
- d) Surface coating usage and documentation. If surface coatings are used during the contractor activity, specific documentation may be required. See HSE or their designee for more information.
- e) Dry abrasive cleaning. If the contractor engages in dry abrasive cleaning activities at TWMC, then specific documentation will be required. See HSE or their designee for more information.

3.0 Contactor Requirements

Contractors and their sub-contractors are required to comply with TWMC policies and instructions, as well as applicable local, state and federal environmental regulations.

Contractor personnel have potential to affect environmental performance and regulatory compliance at TWMC. As a result, contractors must be aware of the environmental rules and regulations associated with their activities. They also must communicate relevant environmental information to their employees who work at TWMC. Contractor personnel and TWMC employees will work together to meet the goals of the EMS.

3.1 Records

The contractor is responsible for the following:

- a) Obtaining required permits and approvals from TWMC and/or other outside entities (municipalities, regulatory agencies, etc.) prior to work commencing. The contractor will document their activities at TWMC on EF-008. This document will be completed and submitted to the project manager prior to work commencing.
- b) Maintaining and providing required records. This includes:
 - 1) Manufacturer's safety data sheets (SDSs) as well as other relevant information for any chemicals or potentially hazardous materials. This will be done prior to the materials being brought into the facility. SDSs may be provided to the project manager, HSE, or other relevant TWMC staff.

EWP-007 EMS Awareness for Contractors

- 2) Preparing and maintaining records pertaining to the work performed. This includes, but is not limited to, records required by environmental or safety rules and regulations or the EMS. Required records will be provided to TWMC staff in a timely manner.

3.2 Waste Management

The contractor is also responsible for properly handling and disposal of wastes it generates during its activities at TWMC. The contractor will:

- a) Not discharge liquids, materials, and/or wastes to wastewater or storm water drains and/or sewers without prior approval from HSE
- b) Not discharge liquids, materials, and/or wastes to waterways or land without prior approval from applicable regulatory agencies or HSE
- c) Properly label, store, and dispose of all waste materials generated from their activities

3.3 Hazard Communications

In addition, the contractor will communicate safety and environmental hazards to their employees and TWMC staff. Contractors will:

- a) Seek prior approval from TWMC for potentially hazardous materials that are brought on-site
- b) Report spills and releases to TWMC project managers or HSE as soon as possible
- c) Know and respond to environmental hazards associated with the work activity. This includes:
 - 1) Providing adequate spill or release prevention for bulk materials
 - 2) Immediately notifying HSE and the associated TWMC project manager of any abnormal conditions found during excavation activities. Abnormal conditions include, but are not limited to, visibly discolored soils, soils with a discernible odor, and/or heavily stained concrete.
 - 3) Ensuring that all employees are properly trained on the following: proper handling of materials and equipment, proper response to incidents involving their materials, and general information related to the TWMC EMS
- d) Communicate work site hazards to contract and TWMC employees. This includes:
 - 1) Being aware of and sensitive to the effects of noise, odor, light, fugitive dust emissions, leaks, and vehicle movement while traveling around or to or from the facility
 - 2) Communicating with the TWMC project manager and HSE regarding the management of potentially contaminated materials. These materials may not be removed from the site without prior approval of HSE.

3.4 Financial Responsibility

The contractor is financially responsible for on-site environmental remediation that is required as a result of their actions at TWMC.

EWP-007: EMS Awareness for Contractors

Appendix A: Definitions

There are no definitions associated with this instruction.

Appendix B: References

Section(s)	Reference	Location
2.0	EF-002 EMS Roles and Responsibilities EP-003 EMS Compliance Obligations EP-004 Monitoring, Measuring, Analysis, and Evaluation EP-005 Emergency Preparedness and Response EP-006 EMS Communications EWP-001 Hazardous and Universal Waste Management EWP-002 Welding Fume and Dust Control EWP-003 Spill Response EWP-004 Surface Coating Usage and Documentation EWP-005 Dry Abrasive Blasting EWP-006 Recycling and Non-Hazardous Waste Management EWP-007 EMS Awareness for Contractors	TWMC Intranet
All	ISO 14001:2015, Element 7.3 Awareness ISO 14001:2015, Element 8.1 (c) Operational Planning and Control	TWMC Intranet

Appendix C: Required Forms

Section(s)	Form Name	Location
2.0	EF-010 Surface Coating Usage EF-011 Dry Abrasive Cleaning	TWMC Intranet
3.1	EF-008 Contractor Environmental Statement	TWMC Intranet

Appendix D: Revision History

Revision Date	Description	Sections Affected
July 5, 2017	Creation of EWP-007	All