



**ARANSAS TERMINAL COMPANY**

**Environmental Compliance Guide**

JULY 1, 2021

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#### Purpose:

This document is provided to assure that Terminal Users and Contractors and Vendors of Terminal Users ("User Group") performing services for or within the Aransas Terminal Company (ATC) are fully aware of the Terminal's ISO 14001 Certified **Environmental Management System (EMS)** and the responsibilities for compliance with the EMS program.

#### Scope:

Our EMS program includes those Terminal operations that take place in association with the Aransas Terminal and all operations that occur at the Docks 1, 2 & 3 and associated laydown areas.

#### User Group Responsibilities:

User Group members and their employees will be aware of and comply with Terminal's Environmental Policy. **A copy of the Environmental Policy is attached.** User Group members and their employees and its employees will review the Terminal's Environmental Policy before conducting any activities on Terminal property. Group members will utilize best management practices to minimize pollution from activities being conducted and will also adhere to the applicable environmental management programs for the work being conducted. The ATC Environmental Policy and ATC Best Management Practices and Environmental Management Programs are attached.

Group members will promptly submit to Terminal Environmental Compliance Manager the proper documentation and records as required for the activities and services being provided.

Group members will be aware of and comply with all applicable local, state, and federal environmental and health and safety rules and regulations.

Group members certify that their employees are competent to perform and complete work assignments as assigned and that each employee has the necessary experience, skills, and training required for each job assignment. Group members will appropriately train employees on ATC EMS requirements and document training on attached User Certification.

Group members will maintain the necessary **emergency response plans and procedures** for responding to emergencies on Terminal property. Users will also train their employees on emergency procedures as required by law for the activities and services being provided. Developed plans and procedures should include notifications to the Terminal Police Department Command Center (361-882-1182, 24-hour number), and copies of plans and procedures should be provided to ATC.

## Aransas Terminal Company Environmental Policy

The Aransas Terminal Company, in collaboration with stakeholders, will strive to exceed what is required as a minimum by applicable rules and regulations to mitigate environmental impacts, prevent pollution, and employ continuous improvement policies and environmental stewardship initiatives that promote the following five (5) essential precepts:

1. Air Quality in the attainment of national air quality standards and in support of the Port Aransas region's efforts to stay in attainment through voluntary actions;
2. Water Quality that maintains or improves the health of the coastal bend ecosystems;
3. Soils & Sediments protective of human health and the environment;
4. Environmental Sustainability in the development of Terminal facilities and Terminal operations;
5. Operational Orderliness to sustain safety, security, and cleanliness within visual and work environments.

This Policy is the formalization of many existing environmental programs that address soil, sediment, air, and water quality impacts. Together, these programs realize tremendous positive results in the surrounding community and estuary.

This Policy is one of the strategic imperatives that will be considered and integrated into decisions related to the development of infrastructure or the operations of Terminal facilities, and support of our mission to lead responsibly the private economy for the Terminal, its stakeholders, and region.

### 1 ATC BEST MANAGEMENT PRACTICES

A. The Contractor will utilize best management practices appropriate to the work being conducted to minimize the potential impacts of its operations.

B. The following best management practices specific to the Terminal will be adhered to when in Terminal area:

#### 1.1. Air Emissions – Particulates:

Contractor will take appropriate measures to prevent particulate emissions from the work area, including wetting the work area to keep the dust down and managing stockpile materials to prevent windblown dust.

#### 1.2. Air Emissions – Diesel:

Contractor will keep work vehicles and equipment well maintained and in good working condition. Contractor will not idle vehicles and equipment when on standby for more than five minutes. Contractor should carpool to the job site whenever possible and utilize alternative fuels when practical.

#### 1.3. Environmental Performance during Fueling Activities:

When working on ATC projects, Contractor will have personnel present during any fuel transfers. Stored fuel will be kept in secondary containment and visually inspected daily for signs of leaks or potential problems. Contractor will also utilize spill pans and proper grounding procedures during product transfers.

Contractors supplying fuel to ATC will also utilize spill pans and proper grounding procedures during all fuel transfers.

#### 1.4 Environmental Performance during Waste Disposal

When working on ATC projects, Contractor will place waste in appropriate containers that are appropriately labeled. Contractor will not mix wastes or re-use containers except when residue is the same material being disposed of. All liquid wastes will be kept in containment.

When providing waste management activities for the Terminal, Contractor should utilize proper loading and transportation procedures to prevent spills and other incidents during shipment. Contractor will adequately dispose of all wastes and maintain appropriate documentation of disposal activities.

#### 1.5 Herbicide and Pesticide Use:

Contractor will use chemicals properly and in the quantities specified on the product labeling or MSDS. Chemicals should not be mixed or counteract the intended effect of each chemical being used.

Contractor will immediately clean up any spills that occur, properly dispose of the material and report any incidents immediately to the Terminal manager at 361-339-0700.

#### 1.6 Hazardous Material Management:

Contractor will take necessary precautions during use or handling to prevent spilling or spreading hazardous materials. Of particular note, all batteries and electrical components are to be recycled.

#### 1.7 Preventative Maintenance

Contractor is required to maintain vehicles and equipment used in the Terminal areas in good working condition. Vehicles and equipment leaking or dripping fluids will not be permitted on Terminal property, and if leaks or drips occur must be immediately and properly cleaned up.

#### 1.8 Street Sweeper

Contractor will conduct routine preventative maintenance on street sweeping equipment utilized on ATC projects, including checking for leaks and will ensure employees are trained and qualified to operate their equipment. Contractor will use wet methods when conducting sweeping. Swept materials will be appropriately handled and disposed of. Contractor will ensure swept material does not enter into stormwater ditches or filter boxes.

#### 1.9 Welding & Brazing

Contractor will utilize appropriate personal protective equipment and will not weld or braze in confined spaces. All paint, solvents, and residue must be removed from the work surface prior to any hot work. Contractor will utilize lead free solder and will utilize alternate connectors when possible. The contractor will conduct welding and brazing in well-ventilated areas and will perform such work utilizing appropriate air cleaners whenever possible.

#### 1.10 Paint Overspray Prevention

Contractor will prevent overspray by utilizing temporary paint booths around the structure to be painted or hand painting when practicable. Unless specified or required, use a water-based coating to minimize emissions; utilize paints with no volatile organic compounds (VOCs) or minimal VOCs whenever feasible. Use high-volume, low pressure (HVLP) paint spray guns and use a proportioner on the gun when applying dual-component coatings, such as epoxies and polyurethanes.

#### 1.11 Electrical Consumption

Contractor should take all steps to reduce the electricity consumed when using Terminal utilities and plan for alternative green energy sources whenever practical.

#### 1.12 Spill Prevention

Contractor should provide adequate containment for liquid products stored and used on ATC job sites and monitor the product inventory closely through daily inspections for spills and leaks. Contractor is responsible for immediately cleanup of all spills that occur. All spill cleanup materials should be picked up and properly disposed of. Drip pans are to be used to prevent leaks to the ground. Contractor's vehicles and equipment should be inspected before mobilization to terminal and each day while here to identify potential problems or leaking fluids.

#### 1.13 Water Consumption

Contractor is to follow area-mandated water restriction measures and employ water conservation measures wherever possible.

#### 1.14 Site Organization and Cleanliness

Contractors and users are responsible for the daily policing of their work environments. The accumulation of debris, garbage, junk, or used materials of any kind will not be tolerated. The failure to maintain a clean worksite is dangerous and will nullify any Facility Access Agreement with immediate effect.

## 2 CONTROL OF SIGNIFICANT ASPECT(S)

The ATC has identified significant aspects of our operations to manage and improve the environmental impacts under the EMS program. Significant aspects are those aspects of our operations and activities that interact with the environment in some way and that ATC has identified as having a high priority for managing. The Contractor is required to comply with the environmental management program (EMP) for the significant aspects applicable to the activities being conducted. The applicable significant aspect(s) for this project include:

- A. Air emissions resulting from vehicle and equipment operation and operation of stationary engines.
- B. Stormwater runoff from the Terminal area.
- C. Third-party environmental performance related to dock operations.

## 3 EMP FOR AIR EMISSIONS

- A. Reduce idling of vehicles, equipment, and stationary engines to less than 5 minutes.
- B. Utilize carpooling to and from job sites whenever practical.
- C. Keep vehicles, equipment, and stationary engines well maintained.
- D. Utilize alternative fuels that are lower emissions.

#### 4 EMP FOR STORMWATER RUNOFF

- A. Utilize Best Management Practices to minimize and reduce the contribution of pollutants to stormwater runoff.
- B. Maintain work areas to prevent trash, debris, and sediments from washing off in stormwater runoff. Keep paved areas and drainage ways swept and free of debris. Properly dispose of all trash, debris, sweepings, cigarette butts, etc.
- C. Environmental personnel will regularly inspect outfalls, remove built-up sediments and debris. Sources of buildup will be investigated and Contractor where responsible, will be required to implement controls to prevent reoccurrence.
- D. Don't rinse off or wash anything down the storm drain system.
- E. Conduct maintenance, painting and blasting activities, and washing activities in contained areas and under cover whenever practical.
- F. Contain all fuels, liquid products, and wastes. Keep batteries under a cover to prevent exposure to rain. Conduct routine inspections to identify potential problems.
- G. Utilize drip pans and containments to prevent spills.
- H. Use silt fences or other controls to prevent erosion of exposed areas.
- I. Clean up spills immediately and completely.

#### 5 EMP FOR THIRD PARTY ENVIRONMENTAL PERFORMANCE

- A. Utilize best management practices for operations being conducted.
- B. Properly dispose of all trash, debris, and wastes.
- C. Leaking vehicles and equipment are not permitted on Terminal property and will be required to be removed immediately upon discovery of a leak. Additionally, vehicle and equipment maintenance may not be performed on Terminal properties.

## Terminal Users Certification Sheet

I certify by signature below that I have received the information regarding the Aransas Terminal Company's (ATC) Environmental Management System (EMS) and understand the requirements for compliance. Further, this certification is my agreement to comply with the ATC EMS Program while working on a ATC job site.

Company name	Date
Employee name	Signature

*Once all Terminal Users and Contractors and Vendors of Terminal Users' employees that will be working in the Terminal have signed the certification, email to ATC at [ops@aransasterminals.com](mailto:ops@aransasterminals.com)*