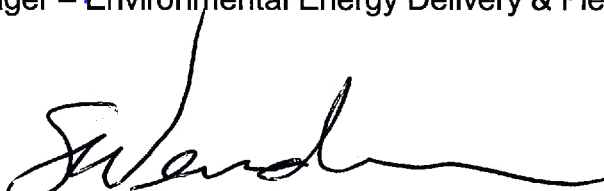


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## EMPLOYEE AND CONTRACTOR MANAGEMENT FOR ENVIRONMENTAL COMPLIANCE

Effective Date: 6-30-18

Approved:  14-5-18  
 Manager – Environmental Energy Delivery & Field Operations      Date

Approved:  14-5-18  
 Manager – Fleet Chemistry (FENOC)      Date

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## 1.0 PURPOSE

- 1.1 This Business Practice provides a standardized approach across the Generation Fleet for environmental compliance requirements of Employees and Contractors working at FirstEnergy (FE)/FirstEnergy Solution (FES) generation facilities.
- 1.2 Generation will foster a safe and environmentally compliant workplace for all employees, contractors and visitors. We will accomplish this by ensuring that programs are in place and that work practices support the vision for environmental compliance as a core value. Leadership, commitment and involvement by all personnel will drive the pursuit of an injury-free and environmentally compliant culture.
- 1.3 These Employee and Contractor Environmental requirements establish a standardized approach across the Fleet for assuring that work performed by Contractors at generating sites is completed in a consistent manner that complies with the various federal, state and local environmental regulations and Company policies and guidelines.
- 1.4 The intent of this document is to meet the requirements outlined in Title 40, Code of Federal Regulations (CFR) for the Protection of the Environment. This document is not intended to implement any of the documentation requirements of Title 10, CFR for nuclear operating facilities.

## 2.0 SCOPE

- 2.1 The Employee and Contractor Management requirements for Environmental Compliance applies to all FE/FES generation facilities.
- 2.2 All Employees and Contractors are required to ensure that they and their employees, sub-contractors, suppliers, vendors, and visitors, comply with the provisions of this manual. **THE PROVISIONS OF THESE REQUIREMENTS SHALL BE STRICTLY ENFORCED.**
- 2.3 These Employee and Contractor Environmental requirements are a supplementary document to all governmental rules, codes and regulations, and does not negate, abrogate, alter or otherwise change any provisions of those rules and regulations. It is understood that the ultimate responsibility for providing a safe and environmentally compliant worksite is the responsibility of all Employees and Contractors.

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2.4 This Business Practice is Mandatory and is to be used in addition to any site-specific documents providing guidance for environmental incidents.

### 3.0 DEFINITIONS

3.1 CONTAINED AREA – an area of controlled drainage in which spills or releases are contained by engineering controls or best management practice, such as ponds, tanks, oil separators, etc. A non-contained area may be modified to create a contained area by using spill booms, curbing, storm drain blockers, etc.

3.2 CHEMICAL TANKS – A storage container for chemicals that may come in a variety of sizes or shapes and are used for storage, processing, mixing, transport of either raw materials or finished chemical products.

3.3 EMERGENCY RESPONSE SPILLS - Spills, leaks or releases that require additional personnel or personnel with specific training to clean up or mitigate due to the quantity or hazards involved.

3.4 ENVIRONMENTAL INCIDENT - Any event that may challenge environmental compliance, i.e. near misses, or excursions. Incidents are investigated and tracked.

3.5 ENVIRONMENTAL “NEAR MISS” - A “near miss” is any condition which has the potential to cause an environmental excursion or an incident affecting the air, water, or land or challenge a site permit condition. Near Miss events are reported throughout Generation in accordance with GEN-ENV-0001, Environmental Spill and Incident Reporting Program.

3.6 EXCURSION – An event outside the environmental limits of a permit, or an event that results in material being released to the environment in excess of permitted requirements. Excursions may include both reportable and non-reportable events.

3.7 FE/FES REPRESENTATIVE – A FE employee responsible for the oversight and supervision of contractors working at generation facilities. For other generation employees, the FE/FES Representative may be the direct supervisor or manager of the employee or the recognized Subject Matter Expert for the area in question.

3.8 FREE LIQUID - Any freely flowing liquid emanating from material or containers.

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- 3.9 HAZARDOUS WASTE - Liquid, solid, contained gas or sludge waste that contains properties that are dangerous or potentially harmful to human health or the environment as defined by Resource Conservation and Recovery Act (RCRA).
- 3.10 INCIDENTAL SPILLS - Spills, leaks, or releases of a hazardous substance which does not pose a significant safety or health hazard to employees in the immediate vicinity or to the employees cleaning it up, nor does it have the potential to become an emergency within a short time frame. Incidental releases are limited in quantity, exposure potential, or toxicity and present minor safety or health hazards to employees in the immediate work area or those assigned to clean them up. An incidental spill may be safely cleaned up by employees who are familiar with the hazards of the chemicals with which they are working.
- IF** the material spilled is unknown **OR** the amount spilled is greater than the capability for one individual to cleanup themselves **OR** the material cannot be contained or isolated safely, **THEN** it is **NOT** an Incidental Spill.
- 3.11 MOBILE EQUIPMENT - Any equipment (with or without wheels) containing a flowable material (petroleum, coolant, product, waste, etc.) that is not a permanent fixture and will be staged and/or utilized in the completion of a job or task.
- 3.12 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT (NPDES) - A permit that covers the discharge to waters of the state. This includes materials entering the Storm Drains at the FE/FES generation facilities.
- 3.13 NON-CONTAINED AREA – Any area in a Generation Facility where the drains trench, ditch, etc. is a pathway to the environment which could result in a reportable event. Installing spill mitigation controls in the area to protect storm drains may make a non-contained area into a contained area.
- 3.14 PERSONNEL– For purposes of this procedure, “Personnel” includes all FE/FES Employees, Vendors and Contractors working at generation facilities.
- 3.15 PORTABLE TANKS – Any tank including, but not limited to, carboys, totes, pony tanks, etc., that are less than or equal to 55 gallons each.

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- 3.16 SAFETY DATA SHEET (SDS) - The SDS sheet contains Health, Safety and Environmental information for a specific product. This information is required to be available by the Occupational Safety and Health Administration (OSHA) and is available across FE/FES Generation on the portal under SDS.
- 3.17 SECONDARY CONTAINMENT - **Permanent:** A barrier or area specifically engineered and constructed to protect the environment from the release of a material.  
**Temporary:** A barrier put in place to control environmental risk for a specific task to protect the environment from the release of a material.
- 3.18 SPILL - Any release of a material from the container or device storing, using or transporting a material and includes, but not limited to:
1. Incidental spills, emergency response spills, and other reportable and non-reportable releases
  2. Material still contained within a secondary containment structure if it has been released from within the containment or contained area.
- 3.19 SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN (SPCC Plan) - This plan covers oil spill prevention, containment and release reporting requirements and is required by USEPA for qualifying facilities. These plans are maintained at each generating station as stand-alone plans or part of the overall facility response plan.
- 3.20 STORM WATER BEST MANAGEMENT PRACTICES (BMP's) - Physical, structural, engineering, or procedural practices implemented to prevent or reduce contamination of storm water.
- 3.21 TEMPORAY TANKS – A tank greater than 55 gallons that contains oil or chemical products that is utilized at the site for a period of less than six months.
- 3.22 TITLE V PERMIT - Operating air permit required by facilities that are major sources of emissions regulated under the National Ambient Air Quality Standards.
- 3.23 USED OIL/ WASTE OIL - Any oil that has been refined from crude oil, or any synthetic oil, that has been used and because of such use is contaminated by physical or chemical impurities. In Pennsylvania, the term “waste oil” is used.

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3.24 WATERWAY - A waterway is any water body (lakes, rivers, streams, creeks, etc.) or any conveyance to a waterway (storm sewers, drainage ditches, groundwater, etc.). A waterway is deemed as such regardless of whether there is water present in the water body or conveyance at the time of release.

#### 4.0 DETAILS

##### 4.1 Responsibilities

#### NOTE

In Nuclear Generation, the Environmentalist is part of the Chemistry Unit and does not report directly to corporate Environmental. Job titles vary between the two Generation Fleets but responsibilities are similar.

4.1.1 Environmentalist or Environmental Field Operations (EFO) Coordinator is responsible for:

1. Oversees environmental compliance and protection of the site
2. Works with site personnel, contractors, and corporate Environmental Department to provide guidance on environmental requirements and restrictions.

4.1.2 Corporate Environmental Department is responsible for:

1. Provides support and guidance to the generation sites and may serve as the FE/FES representative for certain activities.
2. Coordinates all air compliance testing and reporting conducted at the Plant.

4.1.3 Personnel are responsible for:

1. Complying with all federal, state and local regulatory requirements.
2. Adhering to all FE/FES policies and procedures/models at the facility.
3. Immediately communicating any identified environmental issues with their respective FE/FES Representative or FE/FES Supervision.

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4. Ensuring their direct reports, if applicable, always work safely and in an environmentally compliant manner.
5. Supervising and qualifying, as appropriate, their direct reports.
6. Providing the necessary training and information for safe and environmentally compliant work practices while performing work at the generation facilities.

4.1.4 FE/FES Representative is responsible for:

1. Enforcing environmental requirements, policies and restrictions with contractors.
2. Reporting all environmental incidents and “near misses” to the environmentalist or EFO coordinator.
3. Being familiar with the conditions and requirements for all licenses, contracts, and permits required for the work for which they are providing the oversight.

4.2 Permits, Licenses and Inspections

- 4.2.1 All required licenses, permits and inspections necessary for performance and completion of the work scope shall be secured prior to initiating the work.
- 4.2.2 Before applications or notifications for such licenses or permits are filed, the environmentalist or EFO coordinator, with assistance from the corporate Environmental Department, must verify the need for the permit or license and the accuracy of the information being provided.
- 4.2.3 Copies of contractor obtained licenses, permits, etc. shall be provided to the FE/FES Representative prior to commencing work.

4.3 Environmental Risk and Awareness Planning

- 4.3.1 Planning for environmental awareness shall be part of the overall work management process and is the work group’s responsibility.



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4.3.2 Personnel shall implement an environmental awareness plan that may include Job Safety Analysis (JSA)/Pre-Task Analysis Completion prior to the start of each job.

1. Contractors shall use as a guide, GEN-ENV-0003-01, Contractor Environmental Checklist.
2. Prior to commencing any work, Personnel shall review with the FE/FES Representative or FE/FES Supervision site specific environmental emergency response procedures for all potential discharges, spills or releases.

4.3.3 Personnel are required to have adequate and appropriate spill containment and response materials for all substances, chemicals, materials or products that may be brought on-site.

1. Owners of equipment and materials shall plan for rainwater management in secondary containments.

4.3.4 The Responsible Work Group shall observe the requirements GEN-ENV-0003-02, Mobile Equipment Flow Chart for Mobile Equipment brought onto company property.

4.3.5 Mobile Equipment Inspection Tag/ Sticker shall be attached to all mobile equipment by the Responsible Work Group of the equipment.

1. Refer to Attachment 2, Mobile Equipment Inspection Tag/Sticker for ordering information.
2. As noted on the tag/sticker, pre-operational and post-operational inspections are required to ensure there is no leakage of fluids from the equipment.

4.3.6 Personnel shall keep proper spill response equipment in the immediate vicinity of oil containing equipment AND be aware of the nearest spill kit to the work location that may be used to mitigate any potential spill.

1. Spill Kits shall be available in all vehicles, except FE/FES personnel's private vehicles, located at any generation facility.

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2. Personnel shall be observant of the immediate area when positioning oil containing equipment to make sure it is not close to a storm drain (painted red, affixed with permanent lettering or a sign), drainage ditch or waterway.
  3. **IF** unsure of a specific drain discharge point, **THEN** Personnel shall consult with the FE/FES Representative to ensure positioning the equipment will not increase the risk of an environmental discharge should there be a leak/spill from the equipment.
- 4.3.7 Prior to commencing any demolition activities of any permanent structures, Contractors and FE/FES Representative shall jointly agree who will submit and pay for all inspections and notifications required by Federal, State, and/or Local agencies.
  - 4.3.8 Personnel are not permitted to conduct any open burning activities until receiving written permission from FE/FES
  - 4.3.9 Contractor's application(s) for any permits required by Federal, State, and/or Local agencies shall be coordinated through the designated FE/FES Representative and corporate Environmental.
- 4.4 Incident Reporting
- 4.4.1 Personnel shall report all environmental incidents immediately, after initial efforts to safely contain any release, to the FE/FES Representative and for FENOC sites, notify the Control Room and FE/FES Representative/ Supervisor.
  - 4.4.2 The following incident information shall be communicated to the FE/FES Representative and for FENOC sites, notify the Control Room and FE/FES Representative/ Supervisor:
    - Specific location of incident
    - Date and Time of incident
    - Name of Person reporting incident
    - Description of Incident and Corrective Actions
    - Estimated Quantity Released
  - 4.4.3 Except for provided in step 4.4.4, Contractors shall NOT make any notification to any Local, State or Federal regulatory agency regarding any environmental near miss, spill, environmental excursion, etc.

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4.4.4 **IF** in New Jersey **AND** a Licensed Site Remediation Professional (LSRP) is involved with the environmental work being completed **AND** a potential reportable incident is observed/discovered, **THEN** the LSRP shall work with the Environmentalist or EFO coordinator and/or members of the corporate Environmental Department to promptly review the incident for reportability.

1. **IF** the incident is determined to be reportable, **THEN** the required regulatory notifications shall be made in coordination with the LSRP as appropriate.
2. **IF** there is disagreement regarding whether the incident is reportable, **THEN** the LSRP may still act under their regulatory and license obligations

4.4.5 FE/FES reserves the right to review the Contractor's near miss investigations and/or perform FE/FES's own investigation, for the sole purpose of verifying facts, protecting FE/FES personnel and property and limiting FE/FES liability.

#### 4.5 Environmental Compliance Enforcement

4.5.1 As required, the responsible work group shall conduct environmental inspections of the entire work site (area of project) and immediately implement corrective measures.

1. Document gaps in associated plant processes, such as but not limited to, Corrective Action Program (CAP), work orders, or narrative logs for any non-compliant issues identified as appropriate for closure.

4.5.2 Responsible work group shall conduct a job completion walk down as required.

1. This inspection shall ensure that affected facilities, equipment, etc. are left in a safe and environmentally compliant condition prior to the responsible work group leaving the site.
2. Document gaps in associated plant processes, such as but not limited to, Corrective Action Program (CAP), work orders, or narrative logs for any non-compliant issues identified as appropriate for closure

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NOTE

In FENOC, site specific emergency response procedure requirements supersede any conflicts between this Generation Business Practice section and the site-specific procedure. Otherwise, these are the expectations for all personnel working at any Generation Facilities.

4.6 Leak and/or Spill Response

4.6.1 FE/FES Representatives are responsible for assisting the contractor in carrying out spill response duties at the work-site and other associated issues with the work.

4.6.2 The environmentalist or EFO coordinator will verify proper clean-up of all discharges, spills or releases.

4.6.3 Materials used to clean up a spill **SHALL NEVER** be disposed of in the plant trash **UNLESS** otherwise directed by the FE/FES Representative/Supervisor or designee.

4.6.4 Personnel shall identify the scope of the spill/leak and make the following corrective actions and/or notifications:

1. Incidental spills are those that can be cleaned by persons working in the immediate area.
  - a. Personnel must IMMEDIATELY respond to all incidental spills from their work area, equipment and vehicles.
  - b. **IF** working in a Fossil Generation facility, **THEN** personnel must immediately notify their FE/FES Representative of all incidental spills.
  - c. **IF** working in a Nuclear Generation facility, **THEN** Personnel shall notify the Control Room **AND** Chemistry **AND** FE/FES Representative after cleaning up the Incidental Spill.
  - d. Personnel may use spill response materials from the emergency spill kits located throughout the plant to mitigate a release.
  - e. Personnel shall containerize and properly label all clean up materials and contact the FE/FES Representative or Chemistry for proper disposal.

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2. Emergency Response Spills are those that require additional personnel or personnel with specific training due to hazards involved.
    - a. **IF** working in a Fossil Generation facility, **THEN** personnel must IMMEDIATELY notify the FE/FES Representative **AND** Station Control Room of all emergency response spills **AND** shall attempt to stop or prevent the material (chemical, oil, or product) from spreading, reaching a drain, and/or waterway; if conditions are safe to perform this task and the persons are properly trained or otherwise qualified to do so in accordance with Federal, State, and/or Local laws and regulations.
    - b. **IF** working in a Nuclear Generation facility, **THEN** personnel shall IMMEDIATELY notify the Control Room of all emergency response spills.
- 4.6.5 Appropriate FE/FES representative will initiate all notifications to any Local, State or Federal regulatory agencies; the Contractor is **NOT** to make any such notifications.
- 4.6.6 All costs incurred by the FE/FES power stations for responding to spills caused by Contractors will be charged back to the Contractor.
- 4.7 Mobile Equipment
- 4.7.1 Temporary containments must be placed underneath all the following types of equipment when they are stationary in a non-contained area. Refer to the form Mobile Equipment flow chart GEN-ENV-0003-02.
1. Vacuum, tanker, or pump trucks when operating or loaded with any amount of product.
    - a. **WHEN** operating these pieces of equipment vehicle, **THEN** they must have general containment of a least half (1/2) of the maximum potential volume of the largest tank or staged in a contained area.
    - b. **WHEN NOT** in use and parked onsite unattended, **THEN** the equipment must be in general secondary containment or staged in a contained area.

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2. Portable containers (single wall tanks, drums, totes, etc. containing 55 gallons or more) must be in sized containments (110%) large enough to hold the entire volume of the largest portable container on the containment(s). All other sized container(s) must be in a general secondary containment or staged in a contained area.
3. All industrial mobile equipment, such as but not limited to, portable compressors, pumps, generators, portable light stations, etc. **SHALL** be in a general secondary containment or staged in a contained area.
  - a. **Assure equipment tag referenced in Attachment 2 is applied to all mobile equipment.**

NOTE

Pony Tanks with a capacity of less than 55 gallons (oil, gas or diesel) are exempt from this step per SPCC regulations but may be required to be placed into containments as a Best Management Practice (BMP) if it is necessary to locate it near a pathway to the environment.

4. All vehicles with external tanks: for example, saddle, pony tanks, or bed tanks.
  - a. These vehicles parked onsite in off hours must be in sized containment large enough to hold the entire volume of the largest tank of the equipment/vehicle or staged in a contained area.
  - b. **IF** the industrial truck has a portable tank (pony, nurse, etc.) for fuel/oil/chemical, **THEN** the spill response equipment must be located on the truck.
    - Responsible work group shall check the tank level along with the tank, hose and nozzle before and after each use for indication of a leak. Refer to Attachment 2: Mobile Equipment Tag/ Sticker instructions
    - Any defects shall be corrected by the equipment owner immediately.
    - Driver **MUST** stay with the vehicle during fuel/oil transfer activities.
    - Personnel shall immediately contact the designated **FE** Representative and Control Room and report all leaks, spills and unusual activity or observations.

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5. Equipment containing hydraulic fluids, such as but not limited to, cranes, hydraulic lifts, fork trucks, front end loaders, etc. the site will establish a contained work area using mitigation materials to the extent practical.
    - **WHEN NOT** in use and parked onsite unattended, **THEN** the equipment must be in general secondary containment or staged in a contained area to the extent practical.
  6. Any Equipment identified by the FE/FES Representative, Chemistry, Environmentalist OR EFO coordinator.
  7. General secondary containments shall be inspected prior to use to ensure there are no rips, tears or holes in the lining/container that would prevent it from performing its intended function.
  8. Industrial Vehicles being staged/parked onsite should not be near a pathway to the environment where a leak or spill would result in a reportable event.
  9. **IF** it is necessary to place vehicles near or over a pathway to the environment, **THEN** storm drain protection/waterway protection or other spill mitigation strategies should be utilized to reduce the impact of a leak/spill.
- 4.7.2 All Vehicles entering FE/FES property may be inspected for leaks and denied entrance if found to be leaking.
- 4.7.3 All industrial trucks, vehicles, cranes, fork lifts, mobile lighting, pumps, compressors, generators, etc. shall be checked by equipment owners before and after each use for any indications of leaks using a Mobile Equipment Inspection Tag/ Sticker, see attachment 2 for instructions.
1. Spill Kits shall be available in all vehicles (plant trucks, fork trucks, golf carts, etc.) except personnel's private vehicles located at any Generation Facility.
  2. Checks shall include operating the equipment that will be used, an external check of all fluid containing lines (deterioration, abrasion, etc.), verifying the equipment is free of leaks.

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3. Any equipment found to be leaking must be either immediately corrected or safely removed from site or to a designated repair facility.
  - a. **IF** it is not possible to move the equipment/vehicle, **THEN** the release must be contained, the area cleaned up and a temporary containment shall be placed under the leak until the equipment/vehicle can be repaired or moved without creating a release to the environment.
  - b. **WHEN** moving the equipment/vehicle, **THEN** secure the equipment in a manner to prevent a release.

#### 4.8 Oil and Chemical Storage and Handling

- 4.8.1 Storage of all oil and chemicals must meet all applicable federal, state and local regulations.
  1. Refer to Attachment 1 for SPCC guidance.
  2. Refer to FGBP-ENV-0018, Tanks and Piping.
- 4.8.2 Responsible Work Group shall provide all SDS's to the designated FE/FES Representative prior to bringing any oil and chemical on site.
- 4.8.3 **WHEN** working at a Nuclear Generation facility, **THEN** all chemicals shall be approved and controlled in accordance with NOP-OP-3001, Chemical Control Program as applicable.
- 4.8.4 **WHEN** working at a Fossil Generation facility, **THEN** personnel must have facility approval by the Environmentalist or EFO coordinator before bringing on site any tank, tote or drum(s) with any oil or chemical.
- 4.8.5 Responsible Work Group must ensure all temporary tanks, portable tanks, totes or drums used on site meet all local, state and federal regulations, including but not limited to:
  1. Be in proper working condition
  2. Have no leaks
  3. No rust or other signs of deterioration



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4. Display proper labeling
  5. Have all required secondary containment
  6. Conduct all required inspections as required by the site SPCC and SWPP plans.
    - a. Additional inspections may be required by FE/FES Generation in some cases.
    - b. Equipment owners identified on equipment tags are responsible for monitoring and maintaining secondary containments in good condition and free of rain water.
    - c. Inspections shall be included in the owners weekly environmental walkdown process
- 4.8.6 All tanks, totes or drums must be secured during transport to, around and from the facility to prevent spilling, leaking, tipping, rolling or falling during transport.
- 4.8.7 Portable tanks and temporary tanks greater than 55 gallons either need to be:
1. Double walled with:
    - appropriate vents
    - interstitial leak detection
    - over flow buckets and
    - level indicator

OR
  2. Single walled with:
    - a vent
    - level indicator
    - a containment suitable to contain the capacity of the tank plus 10%.

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- 4.8.8 All totes or drums with a capacity of 55 gallons and greater must be stored on spill pallets OR in secondary containment structures designed to hold the capacity of the tote or drum plus 10%.
1. Refer to 4.10, Secondary Containment and Rainwater Release Records for requirements on maintaining Secondary Containments.
- 4.8.9 Chemicals shall be stored in the proper compatible containers as referenced on the SDS.
- 4.8.10 Chemical containers shall be stored segregated or separated according to compatibility so that they cannot accidentally come into contact with each other to cause a reaction such as a fire, explosion, or release of toxic or flammable gases or vapors.
1. Storage of chemicals at a Nuclear Generation facility shall be in accordance with the requirements of NOP-OP-3001.
- 4.8.11 Oil and chemical storage locations should be located indoors where possible and must be approved by Chemistry or EFO coordinator prior to materials being brought on-site.
- 4.8.12 Storage of empty containers with residual product in unapproved locations is prohibited. Refer to site SPCC and SWPP plans for approved storage requirements.
- 4.8.13 Chemical containers must be LABELED with the chemical name and its immediate hazard as indicated on the SDS.
1. Chemical container labeling at a Nuclear Generation facility shall be in accordance with NOP-OP-3001.
- 4.8.14 The Responsible Work Group shall maintain proper spill response equipment in the vicinity of all oil and chemical storage areas.
- 4.8.15 No chemicals or oils are permitted to be stored on the disposal area footprint of any Coal Combustion Byproduct (CCB) landfill or disposal impoundment facility.
- 4.8.16 **IF** bulk storage fuel containers are in use or planned for use by contractors, **THEN** the fuel quantities consumed from these containers shall be reported to the designated FE/FES Representative on a monthly basis.

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4.8.17 Personnel shall ensure all fuel storage containers are closed and sealed when not actively conducting filling operations per the requirements of 40 CFR Part 63 and other applicable regulations and statutes.

4.8.18 A log for all SARA 312 chemicals brought on site by contractors is to be maintained.

1. This log is to uniquely identify the consumable, the corresponding SDS, the monthly consumption, and total quantity brought on site.
2. It is to be submitted to the designated FE/FES Representative on a monthly basis.
3. Typical consumables for inclusion are:
  - welding rods
  - grinding disks and wafers
  - resins
  - coatings

#### 4.9 Storm Water Management and Storm Drain Protection

4.9.1 Storm drains that lead directly to a waterway (such as a stream, river, lake, ditch, etc.) are typically painted red and affixed with permanent lettering or identified with a sign.

4.9.2 At some FE/FES Generations facilities, some storm drains are permanently covered with a removable drain plug or may have temporary covers. Personnel are not permitted to remove any of these devices.

4.9.3 The discharge of any material other than uncontaminated storm water and those permitted by the NPDES permit is strictly prohibited.

1. Examples of materials prohibited from discharge/release include, but are not limited to:
  - any amount of oil or oil-contaminated liquid, including fuel oil, gasoline, vehicle fluids, grease, lubricants and oil based paints and solvents
  - any amount of chemical or chemical contaminated liquid, including process chemicals, acids, bases, solvents, cleaners, lime, scrubber sludge and soda ash

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- any amount of material or debris, including coal, coal combustion byproducts (CCBs), dirt, sand, gravel and vegetation
- any amount of process water, either contaminated or uncontaminated, including water leaks from transport lines, water from blasting trucks and raw water or fire protection water used for any purpose other than fire protection/fighting
- any material created because of hydrolazing or industrial wash water such as but not limited to underdrains, piping clean-outs, etc.

4.9.4 Use of good housekeeping measures and storm water Best Management Practices (BMP) are to be implemented to ensure that materials and contaminants are not entering or discharging to the storm water drains.

1. BMP(s) are physical, structural or managerial practices employed before, during, and/or after the work have been proven and accepted to help prevent or reduce pollution.
2. BMP(s) shall be implemented wherever possible to minimize potential impacts to FE's operations.
3. BMP(s) for Storm water pollution prevention may include:
  - Covering with absorbent pads or socks
  - Building a temporary dike with absorbent material
  - Covering with temporary spill mats
  - Plugging drains
  - Silt socks or straw bales for sediment control materials

4.9.5 Personnel may not redirect any storm water, process water or wastewater to a waterway or discharge point without prior approval

4.9.6 **IF** working at a Fossil Generation facility **AND** a discharge or imminent discharge of a prohibited material occurs near or into a storm drain or waterway, **THEN** notify the FE/FES Representative IMMEDIATELY.

4.9.7 **IF** working at a Nuclear Generation facility **AND** a discharge or imminent discharge of a prohibited material occurs near or into a storm drain or waterway, **THEN** notify the Control Room **AND** FE/FES Representative/ Supervisor. IMMEDIATELY.

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#### 4.10 Secondary Containment and Rainwater Release Records

4.10.1 All oil and bulk chemicals in quantities 55 gallons and greater must be stored in double-walled tanks or situated within secondary containment structures designed to hold a minimum of 110% of the capacity of the tank/tote/drum or be placed in a contained area.

4.10.2 Personnel may release rainwater that accumulates within secondary containment structures after it has been evaluated as follows:

#### NOTE

Release information shall be documented in the Release Log as required by the plant specific SPCC Plan or Storm Water Pollution Prevention Plan (SWPPP).

1. Visual inspections need to be free of contaminants, such as oil, gas, etc. and must be documented and include the date and time of the release each time such a release occurs.
  - a. Personnel shall provide these written release records to the designated FE/FES Representative.
2. Secondary containments that have tanks containing chemicals shall be approved by Chemistry prior to release.

4.10.3 Personnel shall drain secondary containments promptly after a rain event.

1. **IF** accumulated water is visually contaminated, **THEN** Personnel shall contact the Environmentalist or EFO Coordinator **AND** shall NOT release any contaminated water without prior authorization.

#### 4.11 Waste Management

4.11.1 Prior to the start of any project, FE/FES Representative shall provide a description of the types of wastes that will be generated while performing the work to Chemistry or the EFO coordinator.

1. This may include, but not limited to:
  - the process generating the waste
  - the waste as defined by the USEPA per 40 CFR 261.2
  - the volume of waste to be generated
  - the waste disposal plan

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- 4.11.2 Personnel shall comply with all Federal and State laws and regulations regarding waste generation and its disposal.
- 4.11.3 Personnel shall only bring on-site the amount of chemicals expected to be used.
1. Contractors must provide the projected inventory of chemicals to the FE/FES Representative and receive approval prior to bringing new chemicals on site.
    - a. For FENOC sites, use NOP-OP-3001: Chemical control program
  2. Contractors must take all unused chemical products with them upon completion of the job and prior to leaving the FE Generation facility.
  3. Any remaining unused product left by Contractors will be disposed of as waste by FE/FES Generation facilities with all expenses charged back to the Contractor.
  4. Contractors may be charged for these costs if not specifically identified in the contract documents.
- 4.11.4 The following items, the list is not all inclusive, cannot be placed in the plant trash:
- Aerosol cans
  - Fluorescent lamps
  - Electronic wastes (e.g. computers, monitors, circuit boards)
  - Nickel-Cadmium or Lithium ion batteries
  - Chemicals
  - Oils
  - Liquids
1. **IF** uncertain, **THEN** please notify Chemistry or EFO Coordinator.
- 4.11.5 Personnel shall not mix Used/Waste Oil with any solvents, chemicals or waste and will segregate each, as appropriate.
- 4.11.6 Under no circumstance shall personnel utilize Used/Waste Oil for dust suppression on FE/FES's work-sites or anywhere else not authorized by law.

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4.11.7 Personnel shall ensure all hazardous waste remains segregated from other forms of waste and do not become mixed together.

4.11.8 Personnel shall contact the designated FE/FES Representative for containerization and storage instructions for all wastes.

4.11.9 All hazardous and universal waste storage and disposal activities will be approved by Chemistry or EFO Coordinator.

4.12 Temporary Sewage Permitting and On-site Implementation

4.12.1 Prior to beginning work, Personnel shall review with the FE/FES Representative all site-specific needs for temporary sewage systems (portable toilets or sewage holding tanks), the need for temporary connections to the facility's onsite sanitary treatment system or public sanitary sewer system and who will supply such systems/connections.

4.12.2 **IF** the Contractor is providing temporary sewage systems, **THEN** the Contractor shall provide its overall disposal process for such wastes (such as, temporary connections to the wastewater treatment facility, public sanitary sewer system, etc.) prior to site mobilization.

4.12.3 The Contractor shall obtain any temporary sewage permits required by the State or Local Agencies prior to bringing such systems on-site and provide copies to the Environmentalist or EFO Coordinator.

4.12.4 No connections to the facility's onsite sanitary treatment system shall be made without FE/FES approval.

1. **IF** such approval is granted, **THEN** it is understood that these facilities are permitted **AND** strict adherence to the following is required:

- No oil or chemical shall be disposed of down drains leading to the on-site sanitary treatment system.
- All sources of water leading to this treatment facility must be turned completely off when not in use.
- All leaking equipment, toilets, showers and sinks must be turned off until repaired. **IF** such leaks have occurred, **THEN** report the condition to the FE/FES Representative by the end of the shift.

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4.12.5 **IF** a temporary sewage system permit is required for the sewage option implemented by Contractor, **THEN** all associated sewage permits, inspections, pumping and removal records, etc. shall be maintained on-site **AND** copies shall be turned over to FE/FES Representative upon completion of Contractor's work.

4.13 Fugitive Dust and Uncontrolled Air Emissions

4.13.1 All generation facilities have a general obligation to minimize or prevent uncontrolled air emissions and fugitive dust in accordance with Federal, State, and/or Local air permits (e.g. Title V) or nuisance law requirements.

4.13.2 Personnel shall comply with all submerged filling requirements per applicable state laws and regulations to mitigate potential air emissions.

4.13.3 Personnel are expected to understand this obligation and to implement measures during their work to fulfill this obligation.

1. All fugitive dust control measures that Personnel intend to use in the performance of the work scope shall be approved by FE/FES Representative prior to use, including the application of water.

4.13.4 Fugitive dust is to be controlled throughout the performance of work.

4.13.5 Personnel shall not track sediment on plant roads or on FE/FES entrance/exit to public roadways.

4.13.6 Personnel must use planning, engineering controls, or BMP(s) to mitigate any sources which could cause fugitive dust on FE/FES plant property.

4.13.7 Material handling equipment and large stockpiles of material can require special air permits prior to their mobilization, setup, and/or usage.

1. All intentions to use such equipment and/or any other sources of air emissions must be reviewed and pre-approved by FE/FES Representative before mobilizing such equipment.
2. Contractors shall follow all permit and/or exemption requirements to maintain compliance

4.13.8 Vacuum truck operators must maintain the vehicle baghouse controls to minimize fugitive emissions.



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4.13.9 All fugitive emissions must be controlled while unloading materials at designated unloading or disposal areas.

4.14 Refrigerant Containing Equipment and Heating Ventilation & Air Conditioning (HVAC)

4.14.1 HVAC qualified Personnel working at the facility must be certified to handle refrigerants and must maintain records as required by 40 CFR Part 82 subpart F when repairing and/or disposing of appliances or any other equipment containing refrigerants.

1. **WHEN** disposing of equipment previously containing refrigerant, **THEN** the certified technician must ensure labeling is applied to the equipment prior to disposal

4.15 Demolition and Renovation Activities

4.15.1 **WHEN** renovating or demolishing a structure on site, **THEN** ensure environmental assessments are conducted prior to work commencing **AND** approval by the Responsible Work Group.

4.15.2 Prior to demolition and renovation activities, ensure all local, State, and Federal permits are obtained and notifications are completed.

4.16 Management of Sludge and Slurries

4.16.1 All sludge and slurries, if practical, will be managed at the point of generation to a state of “no free liquid”.

4.16.2 **IF** the material cannot practically be managed to a “no free liquid” standard at the point of generation, **THEN** it will be rendered to that condition prior to shipment off site or placement in the on-site disposal facility (with the exception being permitted disposal impoundments).

4.16.3 All specific methods for these management techniques must be approved by the Environmentalist or EFO Coordinator prior to beginning the work.

4.16.4 Sludge and slurries are required to be loaded and transported with a ZERO spill tolerance which includes, but not limited to:

- No leaks from tail gates
- No transfer of waste from wheels or axles to road surface
- No deposition of waste outside permitted areas

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- No dusting of waste from open top truck
- Truck shall be tarped prior to leaving the site

This applies to, but not limited to, cleanouts of oil/water separators, grit basins, settling basins, lagoons, sumps, sedimentation ponds, impoundments, underdrains, and similar facilities.

#### 4.17 Management of Municipal Waste Dumpsters/ Containers

4.17.1 All municipal waste dumpsters, stored outside, utilized on generation facilities will be maintained to mitigate environmental impact and storm water contamination.

1. BMP(s) to minimize environmental risks

- Stored in contained or graveled or grassy areas away from a path leading to a storm drain or waterway
- Lids or coverings
- Spill booms

4.17.2 Those municipal waste dumpsters/ containers with installed lids, shall remain closed at all times except when waste is being added to the dumpster/container.

#### 5.0 RECORDS

Records completed/generated by this procedure shall be handled in accordance with FE/FES Record Retention Policy

##### Quality Records

None

##### Non-Quality Records

None

##### Non-Record

GEN-ENV-0003-01, Contractor Environmental Checklist

GEN-ENV-0003-02, Mobile Equipment Flowchart

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6.0 REFERENCES

6.1 Discretionary

None

6.2 Obligations

6.2.1 Multi-site

FGBP-ENV-0018, Tanks and Piping

GEN-ENV-0001, Environmental Spill and Incident Reporting Program

GEN-ENV-0002, Storm Water Drain Program

NOP-OP-3001, Chemical Control Program

7.0 SCOPE OF REVISION

1. Total Rewrite.

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**ATTACHMENT 1: PORTABLE TANK REQUIREMENTS FOR GENERATION**

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- Free of corrosion and deterioration
- Liquid level detector installed
- Properly marked with tank contents
- Equipped with vents and emergency vents
- Either double walled or have emergency containment to contain 110% of the tank volume
- Double-walled tanks need to have spill and overfill control equipment
- Single walled tanks in containment need to be routinely inspected and any product or storm water expeditiously removed
- Tanks must be located so they are not subjected to vehicular damage or protection from vehicular damage must be provided



Spill Bucket at Tank Fill to Prevent Overfills

Example Liquid Level Gauge

Double Walled Tank

Appropriate Labeling Product and Hazards

Example Double Walled Tank One Product

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**ATTACHMENT 1: PORTABLE TANK REQUIREMENTS FOR GENERATION**

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**Example Single Walled Tank with Containment**

Proper Venting

Liquid Level Gauge

Dike Serves as Overfill Protection at Fill in lieu of Spill Bucket  
Containment Dike Around Tank (Can Hold 110% Capacity of Tank)

\*Tank example would still need to include proper labeling (product, warning, and hazard) as well as Sulfur Content if Diesel is Stored



**Example Double Walled Tank with Protective Cage to Prevent Impact Damage to Tank**

Spill Bucket at Fill Point

Liquid Level Gauge to Prevent Overfills

Proper Product, Hazard, and Safety Labeling

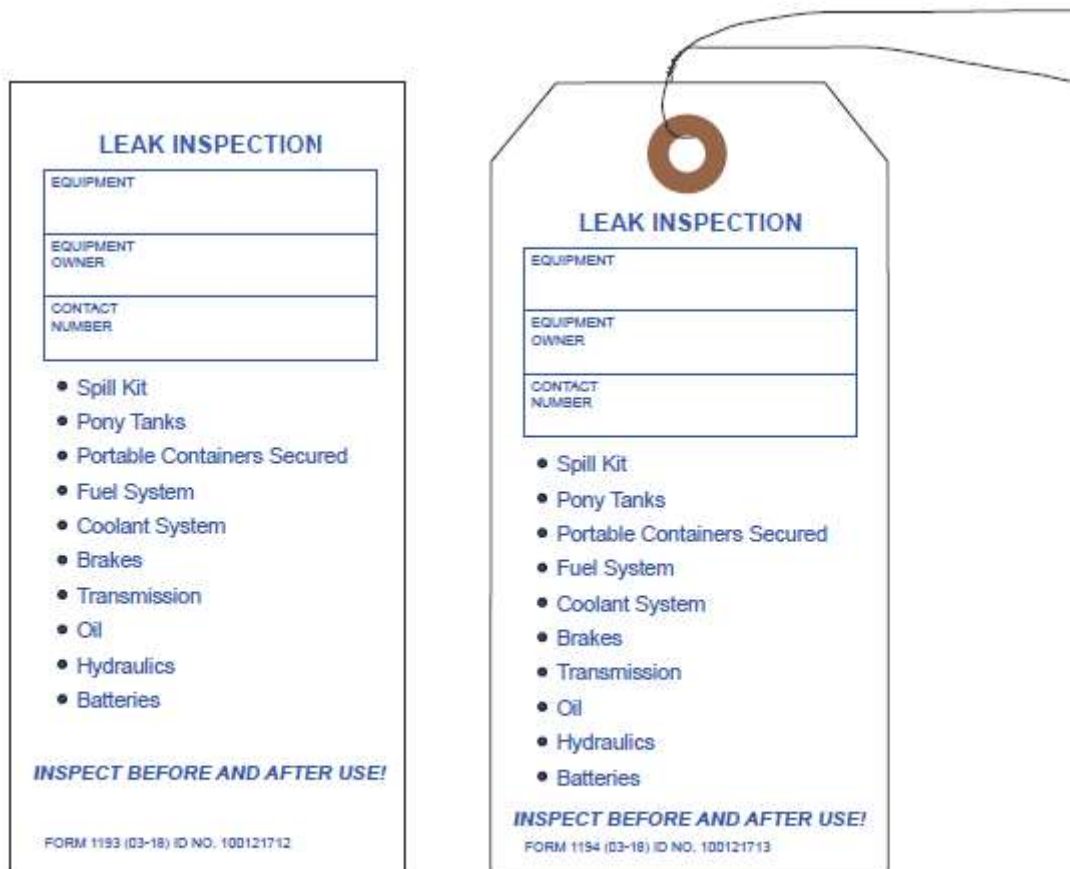
Interstitial liquid level gauge between primary and secondary wall for leak detection

Protective cage to prevent potential impact damage to tank from vehicles or equipment

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**ATTACHMENT 2: MOBILE EQUIPMENT INSPECTION TAG/ STICKER**

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Label, Leak Inspection  
Form 1193  
ID No. 100121712

Tag, Leak Inspection  
Form 1194  
ID No. 100121713

1. To order Sticker (Form 1193), go to:  
<https://firstenergycorp.sharepoint.com/sites/elecforms/Forms/1193View.pdf>
2. To order Tag (Form 1194), go to:  
<https://firstenergycorp.sharepoint.com/sites/elecforms/Forms/1194View.pdf>
3. Enter the quantity desired and they will be printed and delivered.