



# **Environment Protection**

## **Policy Statement, Control Measures and Guidance**

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## ENVIRONMENTAL POLICY STATEMENT

*Unite Lift Services acknowledges the impact of lift sector activities on the environment and strives to attain and preserve a high standard of environmental care in accordance with BS EN ISO 14001:2015 and with full compliance to all relevant environmental legislation and any voluntarily subscribed schemes within our scope of works. We will not knowingly expose the environment to potential harm as a result of our undertakings.*

*We are committed to the continual improvement of our environmental performance and to prevention of pollution as much as it is practicable. In our decision making we will take due care of the environmental impacts of our activities.*

*We will:*

- *Control harmful emissions to the environment*
- *Minimise waste wherever practicable and pursue a policy of waste minimisation*
- *Develop methods to reduce the environmental impacts of current and future activities.*
- *Deal with any waste we remove in an environmentally friendly manner.*
- *Maintain our EMS Management System registration to ISO 14001*
- *Meet all relevant legislation, internationally accepted standards.*
- *Meet all possible client environmental requirements.*
- *Regularly review this policy*
- *Continually improve the environment management system*
- *Practice pro-active management of our processes for effective use of resources*
- *Encourage our employee's understanding the company's environmental issues.*
- *Aim to continually improve the framework setting objectives and constantly monitoring and reviewing.*
- *Plan to transition to renewable energy sources.*
- *Reduce the use of raw materials, energy, water, single-use items and supplies.*
- *Commit to achieving Net Zero and reach Paris Agreement goals.*

*We will develop through information, instruction and training by continuously improving the environmental awareness of our personnel with regard to environmental issues.*

*By working along the "green" principles as outlined above Unite Lift Services seeks to ensure present client needs are met without compromising the ability of future generations to meet their own environmental needs and expectations. By undertaking this Unite Lift Services will fulfil our commitment to the sustainability of today's and future generations by not compromising on its daily activities within contractual and legislative obligations.*

*Where required we will liaise with the statutory authorities, environmental bodies and take the views of neighbouring properties in the vicinity into consideration.*

*We will monitor this policy and update it to reflect future developments.*

*Signed*  
**Managing Director**

*Date:*

## 1. MATERIAL SELECTION

In order to protect our health and safety as well as our environment no chemicals, lubricants or cleaners (collectively referred to as "MATERIALS") may be purchased or used unless approved.

As the most effective way to reduce our generation of waste is to reduce our use of materials, **Unite Lift Services** employees are to minimise the use of all potential harmful materials to the greatest extent possible. This also applies to materials derived from limited resources.

Material Safety Data Sheets or COSHH Sheets will be used to communicate information concerning ingredients, chemical characteristics, fire and explosive hazards, health hazards, reactivity data, precautions for safe handling and use and control measures. The Purchasing Department will be responsible for securing up to date Material Safety Data Sheets.

The purchaser of any equipment containing a material must obtain the appropriate Material Safety Data Sheets before that component can be purchased or used.

Before any locally purchased potentially harmful product can be used relevant Material Safety Data Sheets must be obtained locally.

Material Safety Data Sheets must be passed to the EH&S Department so that an assessment of the material / substance can be made under the COSHH Regulations. The completed COSHH Assessments will be made available throughout the Company and distributed to **Unite Lift Services** employees using the product. Any necessary control measures will be detailed in the Company Employee and Contractor Safety Handbook.

All materials must be properly labelled with the suppliers / manufacturer's name, ingredients, and proper handling instructions.

All materials will be supplied in containers that minimise the possibility for spillage and facilitate waste disposal after use. Recyclable containers shall receive preference. All containers used in the field must have proper labels and closures, including empty containers used for waste products. All containers must be disposed of properly and those over 25 litres must be returnable if possible.

Only **Unite Lift Services** Purchasing shall select operators that will provide **Unite Lift Services** with materials that meet or exceed our environment policy requirements. Selection of materials by the Purchasing Department will not only take account of satisfaction of technical requirements but also take account of environmental impact created by the material e.g. citrus based cleaners will be selected rather than V.O.C. cleaners such as white spirit. The Environment Health and Safety Department will give any necessary advice and guidance.

## 2. NEW MATERIAL STORAGE AT LOCATIONS

### 2.1 Storage Area

Every **Unite Lift Services** location will designate storage space to accommodate materials purchased and delivered. Each storage area will be enclosed, secured and posted with the appropriate warning signs informing **Unite Lift Services** employees that materials are stored in this location

### 2.2 Minimal Quantities

The quantity of materials stored in each location will be decided by each location manager with due consideration given to amounts required to satisfy active contracts. Material volumes must not exceed designated storage space capacity and must conform to local building codes. All locations must meet all fire fighting and emergency response requirements.

### 2.3 Segregation

All materials will be checked upon receipt for the following labelling information:

- Identification of the material's name.

- Warning labels consisting of words, pictures or symbols which identify the chemical and its properties.
- All new materials must be separated from waste materials.

Oxygen cylinders should never be stored near any flammable or combustible substances. Petroleum products, degreasers, solvents, greases and flammable paints must be stored in fireproof cabinets inside the designated storage area.

## 2.4 Indoor Storage of Materials

Materials in small containers e.g. 5 litre containers are to be stored off the ground e.g. on shelves or pallets. 20 or 25 litre containers must not be stacked higher than three to a stack.

Containers of liquids must be stored in or above bunded trays / areas.

Storage must not obstruct, or adversely affect means of exit.

All materials must be properly labelled and stored, handled, and stacked with due regard to their fire characteristics.

Materials must be stored so as to minimise the spread of fire internally and permit convenient access for fire fighting.

Clearance of 1.0 metre shall be maintained between the top level of the stored materials and any sprinkler deflectors.

Clearance of 1.0 metres shall be maintained around lights and heating units to prevent ignition of materials.

Materials shall not be stored within 1.0 metre of a fire exit door opening.

## 2.5 Ventilation

Ventilation is needed in storage areas / rooms to prevent the build-up of potentially harmful vapours.

Natural ventilation is best provided by permanent openings at the roof and floor levels. Windows, doors, skylights, roof ventilators and pipes may be used. A ratio of 0.1 square metres of free inlet and outlet opening per 10 square metres of floor area is recommended.

## 2.6 Outdoor Storage

Outdoor storage of materials is not recommended. However, locations that must store materials in an outdoor storage area must comply with the following, in addition to the requirements of 2.4 above:

Secondary containment of liquids must be provided (See 2.7 below).

Overhead protection must be provided for materials stored outside, and this is to include the bunded trays / areas.

All outdoor storage areas must be enclosed and secured.

Proper warning signs must be posted.

Outdoor storage areas where liquids are stored must not to be located near drains, natural waterways (such as streams) or ditches.

All containers must be properly labelled.

Monthly inspections of container condition and the bunded area must be carried out (see Section 3.1).

## 2.7 Secondary Containment

Secondary containment of materials will be required for all liquids stored inside and outside. Secondary containment must be capable of containing 10% of the total volume of all the containers or the volume of the largest container plus 10% whichever is greater. A reusable drainblocker is to be used when unloading materials in the storage area if a floor drain is present. Spill kits must also be readily available at these locations.

## 2.8 Tracking Inventory

All locations will be responsible for tracking material inventories.

## 2.9 Fire / Safety Compliance

Each location / office must comply with local building codes.

Suitable fire extinguishers must be located in conspicuous locations throughout the storage area.

Emergency lighting and illuminated emergency exit signs must be installed and inspected for compliance with local fire regulations.

All managers/supervisors are to enforce the Company's no smoking policy in all storage areas.

## 2.10 Self Inspection / Audits

Each location is required to conduct a monthly storage area and three monthly office housekeeping inspection to ensure compliance with this Policy.

## 2.11 Emergency Response

It will be the responsibility of all locations to implement the emergency response plans in accordance with Section 9.

## 2.12 Responsibility and Accountability

The site supervisor has the primary responsibility to monitor and enforce the Materials Storage procedure. These practices are enforceable by local authorities, and non-compliance can result in violations resulting in prosecution and fines.

# 3. MATERIAL TRANSFER

This section addresses the requirements for the proper transportation by **Unite Lift Services** of materials from an **Unite Lift Services** location to a job site. Only approved materials can be transported in any vehicle (whether company-owned or privately owned). As a matter of policy, **Unite Lift Services** should only transport quantities of materials necessary to do the job.

The transportation of flammable gases and other materials in quantities exceeding the quantities indicated above will require that the transport vehicle be suitably signed with hazard warning notices posted on the exterior of the vehicle.

Materials in excess of the quantities identified above shall be transported to the job site using private or common carrier or supplier.

Material Safety Data Sheets and COSHH Assessment records shall be maintained in the vehicle for all materials being transported. **Unite Lift Services** employees transporting materials must keep a copy of an emergency response plan (see Section 9) in the vehicle. All **Unite Lift Services** employees using their own vehicles for business-related activities shall be responsible for making the appropriate insurance cover. All transportation-related spills or releases of materials must be reported AS SOON AS POSSIBLE in accordance with the procedures contained in Section 9.

## 3.1 Containers

All materials must be transported in approved containers that are in good condition (no severe rust, dents, bulges or other apparent structural defects) and not leaking. Every material container must be clearly labelled with the original manufacturer's label or a label that describes its contents and its hazards. Materials may be transferred from their original container to another container to suit the needs of the job as long as the new container is compatible with its contents and is labelled in the manner described above. Containers shall be kept closed at all times during transfer and must be secured in the vehicle in a manner, which prevents movement or shifting during transit. Bungee cords, straps, ropes and chains may be utilised for this purpose.

### 3.2 Flammable Gases and Liquids

Compressed or flammable gas cylinders (acetylene, oxygen, propane), whether full or not, must be capped, properly labelled and secured in an upright fashion.

No flammable gases other than propane in containers of 10 Kgs or less, or two containers of oxygen or acetylene with a total net weight of less than 50 kgs may be transported. Such containers must be transported on an open backed truck as detailed above. The Manager must approve the transport of any flammable gases and liquids.

### 3.3 Oils / Lubricants

Materials may not be transported in containers whose capacity is more than 25 litres.

### 3.4 Emergency Response Planning

All **Unite Lift Services** vehicles transporting liquid materials and waste materials must be equipped with a spill containment kit. The quantity of spill containment equipment for each vehicle shall be based on the quantity of materials and waste materials transported.

## 4. STORING NEW MATERIALS ON THE JOB SITE

### 4.1 Approved Materials

Only approved materials will be used or stored on any job site. Any products on a job site that are not approved materials must be removed from the job site in accordance with Section 6 of this Policy.

### 4.2 Storage Areas

#### 4.2.1 Maintenance

Only approved materials can be stored at the job site. Materials stored on the job site must be secured in an area of limited access and be accessible to authorised personnel only. Storage areas should be protected by lock and key. Materials should not be stored in the pit.

Storage areas should be kept neat and clean, and good housekeeping procedures must be followed. Storage shall not obstruct or adversely affect means of access or egress. All materials shall be stored, handled, and stacked with due regard for their fire characteristics. New materials must be segregated from the waste materials at all times.

All new or unused materials in excess of job requirements should be returned to the local office in their original containers.

#### 4.2.2 Modernisation, Repair, New Equipment

Whenever possible materials should be stored inside the building or, if stored outside, protected with a plastic cover from the elements. Oils and other liquids should be located in a bunded area. If bunded storage is not available, the containers should be placed on a substantial plastic sheet and the edges drawn up around the containers and secured thereby creating sealed storage. Account must be taken of the consequences of any leaks and storage is only permitted where leakage will not enter drains or watercourses. It is recommended that wherever possible delivery of liquids is scheduled so that the amount stored on site is kept to a minimum.

It must be kept in mind that these projects have a constantly changing environment and when materials are stored, consideration should be given to the activities of others in order to avoid incident or unnecessary handling.

#### 4.2.3 Service Sites

Not more than 25 litres of any grade of lubricant will be stored at the site. Service contracts that include hydraulic lifts will not be allowed to store more than 25 litres of hydraulic fluid per unit per machine room. All materials must be stored in approved original containers in a safe and environmentally sound manner.

If, as a result of a repair, accumulations exceed the above limits, the excess shall only be stored on the job site for the duration of the work and thereafter be removed from site.

#### 4.2.4 Containers

Materials shall only be stored in approved containers. When materials are not in use, the containers should be properly closed. All containers must be routinely inspected for closure, damage or leakage.

#### 4.2.5 Labelling

All materials and containers stored at the job site must be labelled with the original manufacturer's label.

#### 4.2.6 COSHH Assessments

COSHH Sheets must be readily available for all materials stored on the job site.

#### 4.2.7 Emergency Response Plan

There should be sufficient quantities of approved absorbent stored on the job site necessary to clean up a spill from the largest materials container found in the storage area.

## 5. WASTE MATERIAL MANAGEMENT

### 5.1 Waste storage on the Job Site

Failure to manage waste material in accordance with this Policy could expose **Unite Lift Services** to the threat of civil and criminal fines or penalties, as well as potential long-term liability associated with any environmental impairment. It is a violation of **Unite Lift Services** policy, and the law, to dump, pour or release waste material into a drain, storm sewer, pit, pond, pump, surface water, underground water or onto the ground. No waste material may be stored on lift car tops or in pits.

Waste material, which will be transported from the job site to the location office by **Unite Lift Services** employees, as directed by Section 6, must be secured on the job site in a manner which limits access to **Unite Lift Services** employees only.

New or unused hydraulic oils not used or needed on a job site should be returned to the location office in accordance with Section 6.

### 5.2 Limits of Accumulation on the Job Site

No waste materials other than those identified below may be accumulated at a maintenance job site.

### 5.3 Oils

Prior to transportation to the location office or disposal, waste hydraulic oil, gear oil and other lubricating oils may be accumulated in the machine room in one plastic or metal container not exceeding 25 litres. This can be a container in which new oil was received as long as it is sealable and in good condition. If a container in which new oil was shipped is employed to store or transport waste oils, all original markings and labels shall be removed.

The accumulation container shall be labelled "Used Hydraulic / Gear Oil".

### 5.4 Wipes and Rags

Wipes and Rags contaminated with flammable cleaners must be packaged separately from all other rags used on the job site. **NEVER MIX WIPES AND RAGS CONTAMINATED WITH CLEANER WITH ANY OTHER WASTE MATERIALS.**

Wipes and rags used for purposes other than electrical relay cleaning i.e. not contaminated with flammable cleaners may be kept in a machine room for re-use.

The container for wipes and rags shall be waterproof (rigid or otherwise), capable of being sealed, and should be labelled "Cleaning Wipes and Rags". When no longer re-usable, wipes and rags may be combined with other spent absorbent substances if these are not due to be recycled, and be returned to the location office for disposal (see Section 6 for further guidance).

## 5.5 Absorbent Substances

Spent absorbent substances (granules, pads, stockinette) should be transported from the job site as soon as possible, but may be accumulated on the job site in quantities not to exceed 25 litres.

## 5.6 Paints

Empty paint tins may remain in a machine room only long enough to allow the container residue to dry completely prior to its disposal in the normal rubbish.

## 5.7 Empty Containers

Empty (no free-flowing liquids) containers to be returned to the location office for disposal or recycling shall be secured on the job site to limit access to **Unite Lift Services** employees only. No empty containers shall accumulate in a machine room or on a job site except those, which will be used for the collection of limited quantities of waste oil, wipes and rags or paints.

## 5.8 Modernisation, Repair, New Equipment

Waste material not specifically addressed in this Section, generated as the result of modernisation / repair or construction activities, shall with the approval of the building owner be placed into either the owner's bins or skips. If this approval is not forthcoming **Unite Lift Services** must make arrangements with a licensed Waste Disposal Company. If the waste is returned to the location office for disposal or recycling by **Unite Lift Services**, then it must be transferred in suitable **Unite Lift Services** containers.

Empty containers may accumulate on a construction job site for a reasonable period of time as necessitated by the job requirements.

All other waste material not specifically identified here but typically generated on a construction site may be accumulated on the job site for a period necessitated by the job requirements. However in order to maintain a tidy site and hence safety regular clearance of accumulated waste should take place.

# 6. WASTE TRANSFER DISPOSAL

## 6.1 General

All waste materials generated by **Unite Lift Services** must be containerised, labelled, and transported in accordance with this Section. Specific packaging and labelling instructions for each waste material likely to be generated by **Unite Lift Services** activities will be discussed in this Section. All **Unite Lift Services** employees transporting waste material must conduct their activities in accordance with this Section. In the event that a waste material generated is not identified in this Section, the location manager must be contacted for guidance.

## 6.2 Records

Copies of Transfer and Consignment Notes recording the transportation of **Unite Lift Services** -controlled waste materials must be kept at Head Office.

## 6.3 Containers

All waste material must be transported in approved containers that are in good condition (no severe rust, dents, bulges or other apparent structural defects) and not leaking. Waste containers must be kept closed when not adding or removing waste from it. Waste material containers shall be secured in the vehicle in a manner which prevents movement or shifting during transit. Bungee cords, straps, ropes and chains may be utilised for this purpose.

## 6.4 Health and Safety Data Sheets

COSHH Sheets for materials that are contained in the waste materials being transported must be available and where appropriate copies kept in the vehicle. A copy of the emergency response plan must be kept in all vehicles transporting amounts in excess of 100 litres of waste materials.

## 6.5 Limitations on Waste Quantities Shipment / Transfers

Waste materials may be transported from the job site to the location office in an **Unite Lift Services** -owned vehicle or **Unite Lift Services** employee-owned vehicle, provided the following specific waste stream containerisation, labelling and shipping requirements for waste materials are followed.

### 6.6 Waste Solvents, Paints, etc.

Used Solvents, Paints (including thinners) and substances with Flash Points under 45°C should be held in suitable containers, duly labelled and stored in a fireproof cabinet or store. Such waste is considered as "Special Waste" and should be disposed of as such through Licensed Waste Management Contractors by the use of Consignment Notes. Only approved cleaners / solvents may be transported as waste material back to the location office.

### 6.7 Used Hydraulic Oil, Gear Oil, Lubricants and associated absorbents

Used hydraulic oil, gear oil and oil-based lubricants should be placed in 20 litre plastic or metal containers which must be in good condition (these can be the containers in which new oil was received as long as they are sealable). If a container in which new oil was shipped is employed to transport waste oils, all original markings and labels shall be removed or spray painted over and a new label with the words "Used Hydraulic/Gear Oil" must be applied.

Spent absorbents (Spill Dri, pads or stockinette) contaminated with oils and lubricants shall be placed in 20 litre plastic containers. The container shall be labelled "Absorbents / Rags Contaminated with Used Oil."

New oil not used at job site shall be returned to the location in its original container.

Used oil is deemed "Special Waste" under the Special Waste Regulations and normally requires the completion of Consignment Notes giving details of the location and description of the waste, etc. before disposal. When waste oil is being disposed of a Consignment Note must be completed and sent to the local Environment Agency three days in advance of the movement of the oil.

However the Environment Agency have confirmed that **Unite Lift Services** engineers can bring waste oil back to our premises without the benefit of these notes.

Disposal of the waste oil direct from the site must be made through a licensed oil re-cycling companies who will normally handle this paperwork. Licensed companies may organise their activities to operate a 'Carrier Round', in which case, one Consignment Note can cover the whole round. A copy of the Consignment Note must be kept when the waste oil is collected.

### 6.8 Rags / Wipes

When contaminated with hydraulic oil, gear oil, grease, etc. the rags and wipes should be returned to the location office for disposal through an approved operator. Such rags and wipes shall all be placed in 20 litre plastic containers or in other rigid or non-rigid containers, capable of being sealed. The container shall be labelled "Absorbents / Rags Contaminated with Used Oil."

### 6.9 Paint Cans / Spray Paint Cans

Every effort should be made to use all paint and paint products to minimise waste. Empty paint cans (no free-flowing liquid) shall be air dried and placed into the rubbish container to be treated as Controlled Waste. Full and partially full paint cans shall be returned to the location office or stored on the job site subject to Section 4.2.4. Empty aerosol spray paint cans can be placed into rubbish containers - so long as the rubbish is not going to be incinerated.

### 6.10 Scrap Metals

This includes used metal materials and components, which should be disposed of immediately through a licensed person. If storage is essential then it must be stored in suitable storage areas/containers. Waste metal merchants should be checked to ensure that they are licensed, and Transfer Notes obtained when disposing of the scrap metal.

### 6.11 Hoist Ropes

There are three options

- Recycle / reclaimable metal - treat as scrap metals.
- Place ropes in building owner's bin or skip (with owner's permission).

- Return to **Unite Lift Services** warehouse for disposal as Controlled Waste.

## 6.12 Solid Waste from Modernisation and Repair Sites

**Unite Lift Services** shall notify building owner if it suspects that asbestos-containing material is contained in areas to be renovated. It shall be the responsibility of the building owner to arrange for the disposal of asbestos-containing material.

If any waste asbestos is stored then it must be double wrapped in polythene bags and clearly marked. The Environment Health and Safety Department should be contacted regarding the disposal of this material.

There are several options available to dispose of solid waste removed during modernisation and repair activities if this waste is general waste i.e. Controlled Waste rather Special Waste requiring Consignment Notes.

- With owner's consent place waste materials in owner's bin or skip.
- Return to waste to the **Unite Lift Services** location office for disposal as Controlled Waste.
- Return to **Unite Lift Services** location and segregate recyclables from remaining solid waste and arrange for disposal of solid waste and removal of recyclables

## 6.13 PVC Solvent

Every effort shall be made to use up PVC solvent to minimise waste. Empty (no free-flowing liquid) containers shall be disposed of as solid waste after residues have been allowed to cure (air dry).

## 6.14 Hypodermic Needles

Any hypodermic needles found on client's premises should be left and the client advised. Normally, the local Environmental Health Officer will have arrangements for their disposal.

## 6.15 Empty Container Management

Arrangements shall be made to return excess empty steel drums and 25 litre plastic containers to the supplier.

Empty 20 litre plastic containers may be discarded as a recyclable material. The location office shall assess local recycling requirements. As a last resort these containers may be disposed of as solid waste so long as there is no free flowing liquid. All other empty containers not specifically addressed in this section shall be recycled wherever possible.

Any identifying marks shall be removed from the container prior to its removal from the job site for recycling or disposal. Holes should be made in the base of the container to stop use by others.

# 7. HAZARDOUS MATERIAL STORAGE

## 7.1 Storage Facility / Area General Requirements

Each location office will designate space for the storage of waste materials generated as a result of field service / construction activities. Storage areas shall be provided for used oils / lubricants, cleaners, waste absorbents, rags, and other waste material (including empty containers) intended to be reclaimed, recycled, or disposed of as waste. Waste material storage areas shall be separated (by physical barrier or distance) from other material storage areas. Waste material storage areas should wherever possible be located within the location office / warehouse structure. Each waste material storage area, including dustbins and skips, etc. shall be enclosed, secured and posted with signs to restrict access, as necessary.

Liquid waste material storage areas shall provide secondary containment and complete weather protection. Secondary containment provided (e.g. bunded locations) shall be equal in value to 110% of the total volume of liquid waste material stored or the volume of the largest liquid waste material container, whichever is greater. Therefore, secondary containment is not required for bins and skips, etc. used to store solid waste materials. Sufficient aisle space shall be provided to facilitate inspection of all containers for leaks and marking / labelling and to accommodate basic on-site emergency response (spill / fire) equipment. Each location manager shall minimise the total quantity of waste being stored on-site

Waste material storage areas (including bins and skips) shall not be located in close proximity to any open drain or surface water.

## 7.2 Waste Material Containers

All containers used to store waste material shall be compatible with their contents, in good condition (no severe rust, dents or bulges or other apparent structural defects) and not leaking. Containers shall be capable of being closed at all times except when adding or removing waste.

## 7.3 Segregation of Waste Material Containers

The waste materials identified overleaf must be distinguished from one another through labelling and container type.

## 7.4 Packaging and Labelling of Containers

Waste material containers must be labelled with information that describes its contents and indicates the accumulation start date.

## 7.5 Used Oil

Used hydraulic / lubricating oil shall be placed in new or reconditioned 25 litre closed-top drums before it is shipped off-site. 25 litre drums in which new oil was received may also be used to accumulate used oil and to ship used oil off-site. All old markings and labels must be removed or permanently covered before used oil is placed in such containers. The drums must be labelled with the words "Used Hydraulic / Lubricating Oil" and the date when the first drop of oil is placed in the container. In order to reduce the handling of these containers wherever possible the waste oil should be pumped into tankers for transportation.

Disposal of the waste oil direct from the **Unite Lift Services** location must be made through a licensed oil recycling companies who will normally handle the paperwork,

Wherever possible, waste oil should be sold for re-cycling through licensed Waste Disposal / Re-cycling Companies.

## 7.6 Waste Absorbents / Rags / Wipes

Waste absorbents shall be placed in new or reconditioned 25 litre, open top, steel drums, or plastic-lined fibre drums. The container shall be labelled with the words "Waste Absorbents / Rags Wipes Contaminated with Used Oil.

## 7.7 Waste Material from Modernisation / Repairs

Temporary storage of waste material returned from the field for off-site disposal or recycling / reclamation. Such storage facilities shall provide weather protection for the waste material. Structures such as sheds or transportation related vessels such as skips, bins, etc. capable of being covered, are appropriate to meet this requirement.

## 7.8 Office Waste

Individual metal waste bins should be provided for the accumulation of office waste, paper, etc. Bottles, empty spray containers, etc. should not be disposed of in office waste paper bins.

The contents of office waste bins must be cleared regularly and immediately disposed of or transferred to the Waste Storage Area in polythene bags or directly into suitable containers.

Other office waste, i.e. solid items, such as glass, empty spray cans, etc. should be kept separate and taken to the Waste Storage Area and placed in the container provided at that point.

It is company policy that wherever possible waste paper and cardboard is recycled.

## 7.9 Record Keeping / Documentation

Each office shall maintain records documenting the quantity and type of waste in storage, the date the waste material was received from the field and certain off-site waste material shipment information as follows.

## 7.10 Special Waste

This includes, Waste Oils, Paints, Solvents, Asbestos, etc. This type of waste is required to be disposed of through Licensed Contractors/Sites, and Consignment Notes must be obtained, and retained.

### 7.11 Controlled Waste

At the time of transfer, a written description of the waste and an Official Transfer Note is required to be completed. Both parties must sign. Repeated transfer of the same kind of waste between the same parties can be covered by one Transfer Note, for up to two years.

Amongst the details required on the Transfer Note are:

- a description of the waste;
- the identity and quantity of the waste;
- the type of container, if applicable;
- the time and place of the transfer;
- the name and address of the Transfer and the Transferee;
- whether the Transferor is the Producer, and
- the categories into which the Transfer and the Transferee fall, e.g. waste producer, registered carrier, etc., together with the Registration Numbers.

### 7.12 Inspection

The waste management storage area shall be inspected at least monthly to ensure that containers are properly labelled, in good condition, and neatly organised. The state of all secondary containment e.g. bunded walls and floors must be specifically inspected. All inspections shall be documented, signed and dated by the inspecting employee. The documentation must describe any adverse conditions, appropriate corrective action and when the corrective action was taken.

## 8. WASTE MINIMISATION

### 8.1 Waste Reduction Policy

**Unite Lift Services** policy is to make continuous effort to minimise its generation of all its waste streams, and not just the materials referred to in Sections 1 to 8. Waste, in addition to the material also includes cardboard, wood, and metals, including copper and steel, and office products. Waste minimisation makes good business sense as it reduces both the cost of purchasing raw materials as well as the cost of disposal. While it will not be possible to completely eliminate the generation of waste, **Unite Lift Services** will continuously search out minimisation opportunities.

While the management of **Unite Lift Services** operations is responsible for setting the policy for waste minimisation, it is every **Unite Lift Services** employee's duty to consider this task and the methods that they use to ensure that the reduction of waste is a priority.

### 8.2 Identify Work Opportunities

**Unite Lift Services** shall include and implement in their objectives the development of a waste minimisation plan. This will include:

- Conducting waste audits and estimate the type, amount and frequency of waste materials generated and identify which waste can be recycled.
- Reviewing purchasing policies. For all products purchased, preferences will be given to those products that are recycled or recyclable.
- Tracking material, documenting its movements and its recycling, reuse, or disposal at the location offices is crucial to ensure compliance with legal requirements and best environmental practice.

### 8.3 Field Operations

All service, maintenance and construction personnel must take adequate precautions to prevent the likelihood of uncontrolled oil and chemical spills.

These cautionary activities include:-

- Keeping containers closed except when filling or dispensing fluids,

- Collecting and returning all used containers to location offices
- Having spill kits available when handling liquids.

#### 8.4 Only Use Approved Materials

Other commercially available products shall not be purchased as they may create hazardous waste.

#### 8.5 Unused Oil

Oils purchased by **Unite Lift Services** that have not been used or contaminated shall be returned from the field to the location office for reuse or returned to the supplier. All locations will establish a system to collect and return unused oil while minimising the volume of oil at the office.

#### 8.6 Recycle Hydraulic Oil on Site

Wherever possible hydraulic oil that is reclaimed on site and uncontaminated with solvent should be properly filtered and reused.

#### 8.7 Cleaning Solvents

All employees should minimise their use of cleaning solvents. The solvent container should be kept closed and unused solvents should be returned to the location office.

#### 8.8 Never Mix Cleaning Solvents With Oils

Traces of cleaning solvents may make the entire mixture unsuitable for re-cycling and thus more costly in its disposal.

#### 8.9 Rags / Wipes

Used rags or wipes should be brought back to the location office for proper segregation (see Section 7). Periodically the location will replace rags with clean ones, the old rags should be cleaned and then recycled or disposed of in the proper manner.

## 9. EMERGENCY RESPONSE PLAN

Proper planning for emergencies is necessary to minimise employee injury, property damage and environmental harm. **Unite Lift Services** requires, that each location have an Emergency Response Plan. The steps listed below provide a generic guideline of the items, which are required to conform to that policy.

#### 9.1 Emergency escape procedures and emergency escape routes

Prepare and display in appropriate locations a site map showing exits, location of fire extinguishers, other fire fighting equipment, and other appropriate information. Arrows on the site map shall indicate the flow patterns from all areas of the facility to the nearest exit.

#### 9.2 Procedures to be followed by employees who remain behind to perform critical operations before they evacuate. Designated person(s) should

Check all areas of the building to make certain that everyone has been evacuated.

- Close all fire doors.
- Shut off the power
- Notify adjacent tenants

#### 9.3 Procedures to account for employees after evacuation has been completed:

Managers or other designated personnel will conduct roll calls to ensure all personnel have been safely evacuated.

Provide a designated location a safe distance from the building for everyone to meet and account for each other

#### 9.4 Rescue and medical responsibilities:

It is recommended that designated person(s) at each location be trained in basic first aid and CPR

#### 9.5 Procedures for reporting fires and other emergencies

Prepare and post telephone numbers for emergency services such as fire, police and ambulance. All numbers should be posted at suitable locations e.g. close to telephones.

Provide awareness training for all employees who may be required to use the emergency numbers

#### 9.6 Designated key contacts:

Local management who are familiar with the location and the Emergency Response Plan shall be designated as Key Contacts and their telephone numbers shall be included on the emergency telephone roster. Normally this will be the Location Manager and / or Maintenance Supervisor(s).

#### 9.7 Locations which have stores

Have additional responsibilities because of the storage of hydraulic oil, lubricants, cleaners and waste oil ("MATERIALS"). These locations need to add the following steps:-

#### 9.8 Additional emergency telephone numbers

In addition to the phone numbers outlined above, environmental agencies such as the local Environmental Health Authority and the Water and Sewage Authorities will be available. Local management should consult with their local Department of the Environment to determine which numbers are appropriate.

#### 9.9 Procedures for reporting spills, which may contaminate the soil, enter drains or waterways.

The requirement to report a spill is determined by the amount released. Location management should contact the Environment Health and Safety Department or their local Environmental Health Office to determine their regulations on reporting. Details that require reporting include:

- The amount released
- The location where the release took place
- The material was released
- Any known hazards to people or the environment
- Special conditions at the scene, e.g. fire Details regarding the spread of the release

#### 9.10 Spill Response Plan

A plan to respond to spills which may occur as a result of handling materials shall be prepared and conspicuously posted in the materials storage area.

A spill plan is also recommended for company or private vehicles that transport quantities in excess of 20 litres, and for job sites where 70 litres or more are stored. These plans shall include supplies to absorb and clean up the contents from the largest container.

#### 9.11 Emergency Spill Kit

An emergency spill response kit shall be maintained in the area where new liquid materials or waste liquids are collected or are stored. This kit shall contain absorbents of sufficient quantity to prevent any spill or leak from spreading. Normally this kit will be used as one of the initial steps in an emergency response spill plan.

This kit shall be strategically and conspicuously located close to the storage area and be labelled "Spill Kit."

#### 9.12 Sample Field Spill Response Plan

If safe to do so, place the container upright or plug the source of the leak.

Remove absorbents from container.

Clean up the spill using absorbent materials.

Place all spent absorbents into sealed container.

Label container appropriately (e.g. Oil Soaked Absorbent).

Return spent absorbents to warehouse for disposal.

Clean area with detergent (liquid soap).

Report all spills to management.

### **9.13 Training**

Regular Spill Response Training shall be given to all **Unite Lift Services** employees who handle materials as part of their normal duties.

## **10 Sub-Contractors**

As we are a responsible supply chain management company, if we are required to utilise sub-contractors, they will be required to uphold the same standards of environmental standards as this policy describe when applicable to the sub-contacted works.