

Arnold Machinery Co.  
2975 West 2100 South  
Salt Lake City, Utah 84119  
801-972-4000



*Applying Silver Service to Environment Health & Safety*

**CONSTRUCTION  
EQUIPMENT**

**MINING  
EQUIPMENT DIVISION**

**MATERIAL HANDLING  
EQUIPMENT DIVISION**



## ENVIRONMENTAL PROGRAM



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Updated 07/02//2008 Paul Te Prieto  
Corporate Environmental & Safety Director

## **Environmental Program**

Arnold Machinery Company recognizes our responsibility to conduct our operations as a good citizen. Arnold is committed to complying with environmental laws and protecting the environment in the communities where we operate. Complying with environmental laws and protecting the environment is a company-wide responsibility. Management at each location is expected to accept this responsibility. Associates at all levels are expected to fulfill this responsibility within the context of their particular assignments and to cooperate in related Arnold Machinery and Customer Environmental Health & Safety programs. Policy is intended to help develop long-term benefits for all associates, our community as well as MSHA compliance programs.

- Associates and contractors must comply with all applicable environmental rules and regulations.
- Take precautionary measures to prevent the risk of pollution.
- Train our associates to help them understand their environmental management responsibilities.
- Ensure that methods of waste disposal are safe and create no long-term environmental problems.
- Protect controlled waters, thereby complying with the Water Resources Act 1991
- Pay careful attention to the storage, treatment and disposal of hazardous materials and take precautions against accidental spillage of toxic substances .
- Audit our operations to ensure they conform to our policy.
- Associates are trained to respond to environmental situations by taking appropriate action to meet regulatory requirements, and to report immediately any release of hazardous materials to a supervisor.
- Arnold Machinery Company actively works with regulators to help develop environmental programs.

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## **Environmental Waste Management**

All Branches are considered Conditionally Exempt Small Quantity Generator. Branch generates no more than 2,200 lbs (1,000 kg) of hazardous waste per month, which puts Arnold Machinery in the Conditionally Exempt Small Quantity Generator (CESQG) status. However, each branch is required to report all generated waste and chemicals to State Local Land Emergency Planning Committees, and local Fire Department as required by Article 80. Arnold Machinery Company must comply with three basic waste management requirements to remain exempt from the full hazardous waste regulations that apply to generators of larger quantities (SQGs and LQGs).

- 1 All generated Hazardous and Non-Regulated waste should be identified. Copies of MSDS's will be kept on file at the branch.
- 2 Store no more than **2,200 lbs (1,000 kg)** of hazardous waste may be stored on site at any time. Branches that store over the EPA requirements of 2,200 lbs will lose CESQG status and will require submitting a (TRI) Toxic Release Inventory Report or Tier II report. This must be submitted to the SERC, LEPC and local fire department by March 1 of each year as required by the EPA for LQG.
- 3 Each Branch must acquire the proper Hazardous Waste Permits from the local Fire Department or (LEPC)- Land Emergency Planning Committee. Some States need this to acquire and renew a business license.
- 4 Each branch must ensure delivery of it's hazardous waste to an off-site treatment or disposal facility.
- 5 Each disposal contractor will issue a Hazardous Waste Manifest. Copies of the manifest will be filed at each branch as required by law.

## **Branch/Facility Emergency Response:**

In case of a fire or spill, the Fire Department should be notified immediately. Small oil spills should be easily contained with the use of a spill kit. Since Arnold Machinery Company does not store large amounts of hazardous waste and chemicals, each branch is only equip to contain small oil or chemical spills and do not handle large emergency chemical spills. All large chemical spills must be contained by an outside contractor. Arnold Machinery has contracted the services of TW Company Hazardous Waste and Emergency Response Company. TW Company will handle both facility and DOT related chemical spills.

## **Spill Response Contact:**

TW Company- 24 hour Hazardous Materials Response Service  
**1-800-820-9058**

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### **Waste Minimization and Waste Management**

The most cost-effective way to managing any waste is not to generate it in the first place. The amount of hazardous waste can be decreased by developing a few good housekeeping habits. Good housekeeping saves money, and prevents accidents. To help reduce the amount of waste, practice the following:

1. Do not mix hazardous waste with non-hazardous waste. Segregate waste product and do not mix incompatible wastes. (Flammables, corrosives etc.)
2. Reuse and recycle materials such as cleaning solvents from part washers.
3. Safely store hazardous products and containers.
4. Make a good faith effort. Certify on your waste manifest that you have made a good faith effort to minimize waste generated when you send your waste off site for disposal.
5. Practice proper labeling.
6. Store flammable waste material away from heat source and electrical machinery.

### **Arnold Machinery approved Hazardous Waste Contractors:**

1. TW Company
2. Safety-Kleen
3. IHI Environmental
4. Thermo Fluids
5. Clean Harbors

**Note:** Hazardous Waste Contractors/Consultant will need to fill out a Contractor Pre-qualification form to be able to conduct business with Arnold Machinery. Contractors are required to comply with Arnold Machinery Environmental Health & Safety Programs.

### **LEPC Membership**

Each Arnold Machinery location is committed to Environmental compliance. The same Silver Service attitude applies when it comes to environmental health and safety compliance. Arnold Machinery is a current member of the (LEPC) Land Emergency Planning Committee and donates time to help the community. Branches are encouraged to participate in their State Local Emergency Planning Committee meetings. It is also a good way to keep in good relations with the local State EPA, OSHA, Fire Department and participating businesses and community.

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## Arnold Machinery Company Environmental Compliance

### EPCRA Overview

**EPCRA** was passed in response to concerns regarding the environmental and safety hazards posed by the storage and handling of toxic chemicals. These concerns were triggered by the disaster in Bhopal, India, in which more than 2,000 people suffered death or serious injury from the accidental release of methyl isocyanate. To reduce the likelihood of such a disaster in the United States, Congress imposed requirements on both states and regulated facilities.

**EPCRA** establishes requirements for Federal, State and local governments, Indian Tribes, and industry regarding emergency planning and "Community Right-to-Know" reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety and protect public health and the environment.

EPCRA has four major provisions:

- Emergency planning (Section 301-303)
- Emergency release notification (Section 304)
- Hazardous chemical storage reporting requirements (Sections 311-312), and
- Toxic chemical release inventory (Section 313).

### **Emergency Planning (EPCRA Sections 301-303, 40 CFR Part 355)**

The emergency planning section of the law is designed to help communities prepare for and respond to emergencies involving hazardous substances. Every community in the United States must be part of a comprehensive plan.

- **What are the SERCs and LEPCs?**

The Governor of each state has designated a **State Emergency Response Commission (SERC)**. Each SERC is responsible for implementing EPCRA provisions within their state.

The SERCs in turn have designated about 3,500 local emergency planning districts and appointed a **Local Emergency Planning Committees (LEPC)** for each district. The SERC supervises and coordinates the activities of the LEPC, establishes procedures for receiving and processing public requests for information collected under EPCRA, and reviews local emergency response plans.

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## Arnold Machinery Company Environmental Compliance

**The LEPC membership must include**, at a minimum, local officials including police, fire, civil defense, public health (Health Dept., State OSHA, etc.), transportation (DOT), and environmental professionals, as well as representatives of facilities, businesses, and businesses subject to the emergency planning requirements, community groups, and the media. The LEPCs must develop an emergency response plan, review it at least annually, and provide information about chemicals in the community to citizens. Active LEPC members and sub-committee members who attend 9 of 12 meetings acquire voting privileges proposed by the State or County ordinance before they are put into effect.

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