



WASTE MANAGEMENT AND ENVIRONMENTAL POLICY

Tate Engineering Systems, Inc. is committed to reducing its impact on the environment. We strive to reduce, reuse, and recycle as much as possible.

We challenge ourselves to find ways to reduce our impact at home, work, and for our customers. We are committed to:

- Being aware of all applicable environmental regulations and best practices.
- Complying with regulations, accepted best practices, and customer requirements.
- Focusing on preventing pollution or creating waste.
- Reusing packaging as much as possible.
- Recycling all used oils and metals.
- Utilizing spill prevention best practices.

When at customer sites, Tate will follow all customer specific rules regarding recyclable materials as well as minimizing waste related to the work being completed. In the event the customer does not have an oil recycling program, Tate will safely transport the used oil to its location where it will be properly recycled as used oil.

Tate will not transport or take ownership of any waste that was not generated as part of the scope of work completed by Tate Engineering Systems Inc.

Tate is not a generator of hazardous waste, and has no reporting obligations to MDE or other federal or state agencies. Tate Engineering Systems, Inc. may as part of a client service process up to 220 lbs. of liquid waste which would cause Tate Engineering Systems, Inc. to report to MDE. Any hazardous spill will also cause Tate Engineer System, Inc. to report to MDE and any other state of federal agencies.

Tate will use contracts or other written legal documents to memorialize our obligation to properly handle, transport, treat, store, dispose, and/or recycle the material in accordance with law and industry standards. Prior to shipment of waste Tate will:

Complete verification and identification of the material being disposed or recycled and the nature of the disposal/recycling site (e.g., incinerator, lined landfill, unlined disposal area, etc.) to determine whether the method of disposal/recycling is appropriate to prevent contamination to the environment.

Get assurance that the material will be disposed of or recycled in accordance with legal requirements at the designated disposal/recycling site (for example, reviewing whether the site has the appropriate permits and the site's history of violations).

HAZARDOUS MATERIAL USE

- Tate will provide employees and agency workers with information on chemicals / hazardous materials to which they are exposed that will minimize health and safety hazards.
- Label, store and handle chemical / hazardous material and waste to minimize the potential spills, releases, fires and/or explosions.

WASTE / RECYCLING MANAGEMENT

Waste / recycling streams may include solvents, used oil, batteries, electronic components, paper, etc. The first step in this management process is to identify and evaluate waste and recycling streams. Facilities should aspire to eliminate generation of waste, reduce quantities of waste generated, reuse any wastes that can be reused, and recycle all that remains.

MINIMUM EHS REQUIREMENTS

Prior to commencing operations and prior to making any operational changes, identify and characterize potential waste / recycling streams to identify applicable regulations.

Maintain an inventory of all waste / recycling streams along with the name of the waste / recycling contractor.

Maintain supporting documentation for each waste / recycling stream including:

- Test results
- Characterizations and calculations
- Develop a strategy to eliminate, reduce, reuse or recycle waste material.
- Store all wastes in a manner to prevent releases and violent reactions.
- Ensure proper disposal of wastes, taking into account how the waste is regulated.
- Correctly label all shipments of wastes.
- Maintain documentation according to applicable regulations

SPIILLS, RELEASES & REMEDIATION

Facilities must protect their sites and adjacent grounds from pollution by preventing and promptly responding to leaks, spills and releases. Management personnel must ensure that environmental remediation activities at properties are properly managed.

MINIMUM EHS REQUIREMENTS

- Review potential scenarios for spills and releases including identification of spill scenarios that would be reportable to regulatory agencies.
- Minimize the potential of spills or releases through good storage and handling practices (e.g., visual inspection of tanks, preventive maintenance, and/or integrity checks).
- Establish and maintain controls for early detection and mitigation of spills or releases (e.g., leak detection, secondary containment and/or overfill controls).
- Establish and maintain spill response procedures, including processes for containment, cleanup, and notification/reporting.
- Promptly notify Tate Management of any spills or releases that may be reportable to regulatory agencies.
- Document significant spills and accidental releases, including the response activities undertaken. Significance may be determined by using parameters such as quantity, material and location.