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1 Purpose

In support of our environmental stewardship efforts, Silver Eagle Distributors Houston, LLC (Silver Eagle Houston) is committed to meeting and striving to exceed all applicable environmental compliance regulations and operating in a manner that prevents pollution, reduces energy and fuel consumption and waste, and promotes sustainable best management practices. This standard describes the requirements that Silver Eagle Houston has established to meet this commitment and continuously improve our operations.

2 Scope

This standard covers all Silver Eagle Houston branches and operations. All employees are expected to adhere to the requirements and guidelines established herein.

3 Roles and Responsibilities

3.1 HSE Department

The HSE Department will provide guidance on environmental regulations, best practices and the requirements of this standard, including methods to reduce energy use, waste generation, air emissions and impacts to land or water. In conjunction with senior management, the HSE Department may set environmental goals as part of the annual HSE review process.

3.2 Managers and Supervisors

Managers and supervisors are expected to ensure their employees adhere to the requirements and guidelines in this standard and to evaluate their areas of responsibility to identify ways to reduce environmental impacts.

3.3 Employees

All employees are expected to follow environmental regulations and the guidelines and requirements in this standard and to use sound environmental practices while performing their duties. All employees are encouraged to identify ways in which Silver Eagle Houston can further reduce our environmental footprint and increase our efficiency.

4 Requirements

4.1 Air Emissions

4.1.1 Silver Eagle Houston's largest source of potential air emissions is our fleet operations. Significant reductions in fleet air emissions can be sustained by:

- Use of Ultra Low Sulfur Diesel (ULSD),
- Use of Clean Diesel Technology,
- Use of Compressed Natural Gas (CNG), and
- Vehicle retrofitting using Selective Catalytic Reduction (SCR) technology.

4.1.2 Additional reductions in air emissions can be ensured by:

- The use of low/no VOC paints and solvents, whenever possible,

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- Ensuring containers of liquid materials with the potential to form harmful vapors or fumes are securely closed when not in use, and
- Maintaining properly functioning paint booths and vent hoods.

4.2 Land and Water Impacts

Silver Eagle Houston’s operations will be conducted in a manner the reduces impacts to land or water. This will include:

- Ensuring all regulatory requirements for chemical and waste handling and storage are satisfied, including implementation of Spill Prevention, Control and Countermeasure (SPCC) Plans where necessary.
- Ensuring adequate secondary containment is in place for chemical and waste storage, when required,
- Ensuring solid and liquid waste is placed in appropriate containers, labelled and properly disposed,
- Maintaining adequate and accessible spill response supplies,
- Responding to spills of hazardous liquids or hydrocarbons immediately, and
- Ensuring appropriate clean-up and remediation is performed.

4.3 Fuel and Energy Consumption

Silver Eagle Houston employees will perform their duties in a manner that reduces unnecessary fuel or energy use. Fuel and energy use reduction methods include:

- Avoiding unnecessary idling when operating vehicles or mobile equipment with internal combustion engines,
- Avoiding unnecessary driving and following the most direct practical route,
- Turning off lights, appliances and electronics when not in use,
- Using energy-efficient equipment, appliances and electronics whenever feasible, and
- Maintaining interior thermostat settings that are reasonably comfortable without overuse of heating/air conditioning.

4.4 Waste Management and Reduction

Silver Eagle Houston will manage its waste in accordance with applicable regulation and use practices that reduce waste generation. These practices include:

- Segregating waste according to its classification,
- Ensuring hazardous waste is labelled, stored and disposed properly,
- Reducing the use of consumable products to reduce generated waste,
- Using products, when practical, that are recycled or recyclable,
- Reusing materials rather than discarding them, whenever possible,

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- Recycling appropriate materials, such as glass, plastic, aluminum and e-waste, by segregating them from regular waste, and
- Ensuring water usage is managed to avoid waste through leaks, etc.

5 Training

Employees will be informed of Silver Eagle Houston’s HSE policy and its environmental sustainability efforts as part of the new employee orientation process.

6 References

US EPA Regulations - 40 CFR

Texas Commission on Environmental Quality Rules - 30 Texas Administrative Code (TAC)

7 Document Revision Register

Revision #	Section #	Date	Revision Description
0		01/01/2020	Initial Issue