

JAGUAR ENERGY SERVICES, LLC 310 N Parkerson Ave Crowley, LA 70526	Environmental Action Plan
Original Date of Implementation: October 2013 New Effective Date:	Plan Revision Date: Page 1 of 9
Reviewed By: Jared Monk	Date: 01/10/2022

Section 63.0 ENVIRONMENTAL ACTION PLAN

A. Purpose

The purpose of this policy is to give guidance to **JAGUAR ENERGY SERVICES, LLC** personnel in the proper actions to be taken to prevent spills or other emergencies from happening and what to do in the event that an emergency did happen.

B. Scope

The Resource Conservation and Recovery Act (RCRA) promulgated in 1980 regulates virtually all hazardous wastes generated by industry.

1. This was mandated by passage of Hazardous and Solid Waste Amendment of 1984.
2. This requirement mandates that all companies have and implement an Emergency Response Plan.

C. Responsibilities

1. The Safety Coordinator or his/her designee responsible for ensuring that **JAGUAR ENERGY SERVICES, LLC** personnel obtain initial training on this procedure.
 - (a) Additional responsibilities include:
 - (i) The implementation of this Policy.
 - (ii) To maintain a record of the training of each of their employees at a local or central location.
2. The Safety Director is responsible for providing assistance in the implementation of this Policy.
3. The Supervisor is responsible for providing assistance in the implementation of this policy.
4. **JAGUAR ENERGY SERVICES, LLC** personnel are responsible for acquainting themselves with the local fire protection equipment when working at customer sites.

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- (a) Additional responsibilities include:
 - (i) Completing required training.
 - (ii) Applying proper safe practices in all work activities.
 - (iii) Ensure that they are familiar with Emergency Response Plan.

D. Procedure

JAGUAR ENERGY SERVICES, LLC exposure to oil spills and other environmental damages to our work locations is considered minimal; however, every effort must be taken to insure that we contribute zero pollution to the environment.

1. When **JAGUAR ENERGY SERVICES, LLC** personnel are working on a client's location the supervisor for the client and **JAGUAR ENERGY SERVICES, LLC** supervisor will review the client's Emergency Response Plan.
 - (a) The client's Emergency Response Plan will be used in most cases.
2. Hazardous waste generated (or possibly generated) by **JAGUAR ENERGY SERVICES, LLC** includes, but are not limited to:
 - (a) Used off-spec or waste oil (i.e. refined)
 - (b) Spent solvents
 - (c) Waste paints
 - (d) Ignitable wastes
 - (e) Caustic soda
 - (f) Contaminated drilling fluids (i.e. caustic soda, lime)
 - (g) Crude oil
 - (h) Natural gas
 - (i) Hydrogen Sulfide Gas
 - (j) Hydrogen Sulfide oil
3. Pollution
 - (a) Pollution, housekeeping, safety and fire protection go hand-in-hand.
 - (b) Oil that has leaked from a pipe or other piece of equipment pollutes the environment and is a fire hazard which can lead to serious injury or death and damage to **JAGUAR ENERGY SERVICES, LLC** property.
 - (i) Oil on floors presents a slipping hazard that can seriously injure workers or cause a fatality.

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- (c) Pollution occurs either as a result of an accident, operating equipment malfunctions, or failure to follow good operating practices.
 - (d) Everyone must strive to eliminate oil spills and other types of pollution in **JAGUAR ENERGY SERVICES, LLC** operations.
 - (e) Loose connections:
 - (i) Cause oil leaks
 - (ii) Create safety hazards
 - (iii) Are an indication of poor housekeeping
 - (iv) Are a prime source of pollution
 - (f) All leaks should be repaired as soon as practical.
 - (g) Open ended lines should be closed by blind flanges or bull-plugs where practical to prevent accidental discharge.
 - (h) Where the use of blind flanges or bull-plugs are not practical, then drip-pans should be provided.
 - (i) Deadlock devices or spring-loaded closing devices should be used on all open-ended valves on aboveground storage tanks.
 - (j) Drip-pans, bleed-off lines and gauge columns should be piped to sump or storage tank.
 - (k) Storage tanks should be located as far as practical from any source of ignition and should be covered so that there will be no chance of igniting the oil.
 - (l) Satisfactory means must be provided to empty the tanks to prevent overflow.
 - (m) Rigid schedules for pumping out tanks must be set and followed.
4. On each location there is equipment unique to the work being performed.
- (a) The type of equipment used dictates the type of hazardous wastes generated that could potentially harm the environment.
 - (b) To assist field location personnel, an Environmental Inspection Report will be used on each job to conduct an environmental audit at all work-sites by the supervisor in charge.
5. On jobs where subcontractor equipment is present and **JAGUAR ENERGY SERVICES, LLC** has a service agreement, an environmental audit may be conducted on the subcontractor's equipment separately or as part of the normal **JAGUAR ENERGY SERVICES, LLC** audit process.

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- (a) The appropriate subcontractor representative and the Safety Director shall discuss the report to determine any corrective actions to be taken.
- 6. Environmental Inspection Reports must be sent to the Safety Director the day they are completed.
- 7. The Safety Director will participate in both safety and environmental audits during field trips.
 - (a) All new projects will receive both a safety and environmental audit by the supervisor or Safety Director to ensure OSHA and EPA standards are adhered to.
 - (b) Any needed changes to ensure compliance will be discussed with supervisor and Safety Director.
- 8. Environmental Control:

JAGUAR ENERGY SERVICES, LLC will install pollution rails on all new skids and equipment packages as well as, retrofit any old skids now in use for compliance.

 - (a) Equipment will be made leak free whenever possible.
 - (b) Equipment that has sever irreparable leaks will be shut in until repaired or replaced.
 - (c) Small amounts of oil around equipment will be cleaned up and may be neutralized with a soap and water solution or a biodegradable degreaser solution for contamination.
 - (i) An example of contamination would be a minor spill of less than 10 gallons.
 - (d) Areas around the equipment that have been saturated with oil will be cleaned up.
 - (e) Used engine oil will be stored in barrels free from any other chemicals.
 - (f) Only the same chemical must be stored in the same barrel.
 - (g) All barrels must be kept closed except while being filled.
 - (h) All barrels must be labeled and dated with the date of the first time any oil was put in it.
- 2. Disposal of Hazardous Waste

JAGUAR ENERGY SERVICES, LLC has an EPA ID Number.

 - (a) For information refer to:

FOR LOUISIANA
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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OFFICE OF SOLID WASTE AND HAZARDOUS WASTE
HAZARDOUS WASTE DIVISION
P. O. BOX 82178
BATON ROUGE, LA. 70884-2178
PHONE (225) 765-0355

FOR TEXAS
TEXAS NATURAL RESOURCES CONSERVATION COMMISSION (TNRCC)
OFFICE OF POLLUTION PREVENTION AND RECYCLING
P. O. BOX 13087
AUSTIN, TEXAS 78711-3087
PHONE (512) 463-7727

- (a) The assigned EPA ID Number is to be used on all vendor manifests when disposing of hazardous wastes.
- (b) Used engine oil is not a hazardous waste; however, hazardous wastes for our purposes shall be defined as spent solvents, used paint thinner, waste paint, and off-spec used engine oil or waste oil slug.
- (c) A copy of all vendor manifests is to be sent to the Safety Department.
- (d) Where possible, the practice of disposing of used oil through the customer shall remain in force.
- (e) In the event the hazardous waste or used engine oil is not accepted by the customer, then the hazardous waste shall be disposed of by a licensed vendor and the used engine oil shall be recycled through an authorized vendor.
- (f) Filters shall be disposed of by an authorized hazardous waste disposal vendor.

2. Reportable Hazardous Substance Spills

If a reportable spill (25 gallons or more) does occur:

- (a) Report the spill to the supervisor of **JAGUAR ENERGY SERVICES, LLC** that the work is being done for.
- (b) Report the spill to **JAGUAR ENERGY SERVICES, LLC** management.
- (c) The substance involved in the spill and the damage that incurred as a result of the spill must be identified at that time.
- (d) The Management will verify the substance spilled against the EPA Toxic Substance Listing in the Federal Register and make appropriate notification to local, state, and/or federal agencies.
- (e) All efforts must be made to neutralize and clean up the spill as soon as it occurs.

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- (f) The responsible supervisor of the location where the spill occurred will prepare a report on the circumstances that caused the spill and provide recommendation for prevention.
- (g) The report will be forwarded to the Safety Director located at 500 Deer Crossing Dr. Madisonville, LA 70447 within eight hours.

3. **Emergency Response Plan**
The Emergency Response Plan is to be posted at each location and reviewed by all employees once posted and semiannually thereafter.

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EMERGENCY RESPONSE PLAN

Location Number _____ Client _____

Location _____ Date _____

Primary Emergency Coordinator:

Secondary Emergency Coordinator

The following actions are to be taken in the event of an accidental spill of any hazardous waste or other chemical at **JAGUAR ENERGY SERVICES, LLC** locations:

Material or Substance	Action	Precautions
Unused Oil	Use disposable absorbable material to remove spill	None
Used Engine Oil	Use disposable, absorbable material to remove spill	Flammable above 200 <input type="checkbox"/> F Flammable above 200 <input type="checkbox"/> F
Acids and Alkalis	Soil replacement as necessary Use shovel or other mechanical means to remove spill	Irritating to skin. May be caustic
	Dilute with water	Rubber gloves, goggles, boots and apron to be used during removal.
Spent/Unspent Solvents	Soil replacement as necessary No smoking in area	Toxic to nervous system
	Class ABC fire extinguisher on hand	Flammable
	Use disposable material to remove spill	Do not used with oxidized agents
	Place in metal air tight container	Use safety glasses, rubber gloves, rubber shoes, rubber aprons and respirators during removal.

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Ignitable Wastes	No smoking in area	May be toxic to nervous system
	Have and ABC fire extinguisher on hand	Highly flammable
	Use disposable materials in a metal, air tight container	Heat may detonate
	Evaluate for soil replacement	Irritating to pulmonary system
		Use rubber gloves, goggles, apron, shoes and respirator during removal.

GENERAL CONSIDERATIONS - SURFACE POLLUTION

In all cases where a spill may contaminate a river, canal, lake or any navigable waters, stop the flow of contamination as soon as possible.

Spills of 25 gallons or more of any substance require notification of the EPA; however, notify the **JAGUAR ENERGY SERVICES, LLC** management, located at 500 DEER CROSSING DR, MADISONVILLE, LA 70447 and EPA notification will be made from there.

Any oil or chemical spill on offshore or inland waters will be reported to the office located at 500 DEER CROSSING DR, MADISONVILLE, LA 70447. The Emergency Response Plan is to be reviewed semi-annually at scheduled safety meetings. All field personnel are to have a thorough operating/working knowledge of the plan.

Where there is a spill of a chemical not listed above, please call the Safety Manager in the home office located at 500 DEER CROSSING DR, MADISONVILLE, LA 70447 for consultation on clean-up procedures.

GENERAL CONSIDERATION - AIR POLLUTION

Regulations and laws pertaining to air pollution shall be adhered to based on local, state, or federal statutes for the state(s) in which we operate.

Potential changes or modifications to equipment to comply with air quality control standards of any state shall be referred to the Engineering Department for consideration.

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Emergency Response Plan Reporting Procedure



Notify Company Man



Notify Superintendent on Call



Notify Safety Coordinator

He will notify the National Response Center whose telephone is answered by the United States Coast Guard



Notify Assistant Safety Coordinator

If Safety Coordinator is not Available