

POLICY

DynMcDermott Petroleum Operations Company

RESPONSIBLE FUNCTION: DM ENVIRONMENTAL	SUPERSEDES: ASP5400.2 3.0, "ENVIRONMENTAL POLICY"	POLICY NO: ASP5400.2 VERSION: 3.1 PAGE 1
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TITLE: ENVIRONMENTAL POLICY

Effective Date: December 7, 2009

Directing Documents:

- a) International Organization for Standardization. ISO 14001:2004(E), "Environmental Management Systems – Requirements with Guidance for Use"
- b) Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management"
- c) DOE O 430.2B, "Departmental Energy, Renewable Energy and Transportation Management"
- d) DOE O 450.1A, "Environmental Management Program"
- e) SPRPMO P 451.1C, "SPR Environmental Policy"

Policy Statement: The Strategic Petroleum Reserve operates only in an environmentally responsible manner.

***Environmentally responsible manner* means that top management pledges all functional levels will:**

- **comply with applicable legal and other requirements to which the SPR subscribes which relate to the environmental aspects of SPR activities,**
- **prevent pollution through design, processes, practices, techniques, materials, products and services so that detrimental environmental impact is reduced or eliminated, and**
- **continually improve environmental performance through the EMS.**

This environmental policy is implemented by top management of DynMcDermott Petroleum Operations Company (DM) through an environmental management system (EMS) under an integrated safety management (ISM) umbrella.

This environmental policy applies to the facilities and pipelines comprising the Strategic Petroleum Reserve (SPR) and managed and operated by DM. The mission of the SPR is to store petroleum and maintain drawdown readiness. Protection of the environment, workers, and the public are responsibilities of paramount importance. To control environmental impact, DM and its contractors who work at the SPR endorse environmental protection at all management levels and integrate it into all phases of activity – from concept, design, development, and construction, to operation, maintenance, and decommissioning.

This environmental policy provides the framework for setting and reviewing environmental objectives and targets that assure excellence in environmental management. It aligns with the

DOE SPR Environmental Policy (SPRPMO P 451.1C) which is communicated to all persons working for or on behalf of the SPR by DOE. This DM Environmental Policy is available on request at all SPR facilities and electronically on-line at www.dynmcdermott.com .

Functional Oversight: The DM Environmental Department is responsible for assuring the periodic review of this policy by DM top management as well as its update.

Version History – Significant Changes		
Version	Description	Effective Date
3.1	The SPR Environmental Policy (SPRPMO P 451.1C) was added as a directing document. Minor revisions were made to focus the scope of the policy on DM and DM contractors. This policy also aligns with and supports the DOE SPR Environmental Policy. History description for version B0 was added.	12/7/09
3.0	This is a complete revision structured after policy requirements set by ISO 14001:2004 standard with respective information from previous DOE and DM environmental policies.	12/9/08
2.0	Minor revisions were made to the scope of the policy and to align this policy with the DOE Environmental Policy (SPRPMO P 451.1B) and the DOE ES&H Manual (SPRPMO M 450.1-1A).	11/29/07
1.0	Versioning was changed to 1.0 in concert with requirements of the new Documentum document management system. In Section A., misuse of resources was added as a negative environmental impact, and environmental enhancement was added as a means of creating positive environmental impact.	11/21/06
K1	Minor revisions include deletion of “Draft” from header on pages 2 through 4 of the document and addition of effective date for K0 on this version history table. No significant content changes were made. Revision bars from the K0 version were left in this version.	12/20/05
K0	Policy was revised to support requirements of the ISO 14001:2004 Standard.	12/02/05
J0	Policy was re-formatted in accordance with the DM Document Control and Management Program. Functional oversight for the policy was added. The policy is now more accessible to the Public through the DM website (added web address in paragraph D).	12/15/04

Version	Description	Effective Date
I0	Added wording that more explicitly states that DM will be involved in community environmental outreach in section B. Revision bars in the right margin mark the changed paragraphs.	12/05/03
H0	Added wording that more clearly states: top management's commitment to compliance and continual improvement (see B below), the framework for establishing and reviewing objectives and targets (C), and requirements for revision of the policy (E). Revision bars in the right margin mark the changed paragraphs.	11/11/02
G0	Deleted specific responsibilities from this document and revised to contain only policy information. The deleted information is covered in other documents.	11/29/01
F0	Changed "ES&H" to "ES&Q". Deleted section 4.J, Quality Assurance, and moved 4.J.[1] under 4.B, ES&Q Director. Changed the term "independent assessment" under 4.J.[1] to "management appraisal". Deleted section 4.M., Information Systems. Other minor changes were made to sentence structure. Changed paragraphs are marked with a revision bar in the right margin.	5/01/01
E0	Combined subsections 3.3.B and 3.3.C into a single paragraph entitled Prevention of Pollution and added the words "prevent pollution" to 3.2. Expanded wording in 3.3.D., Compliance, regarding other requirements. In section 4, responsibilities, added environmental management system representative and general responsibilities. Changed paragraphs are marked with a revision bar in the right margin.	4/28/00
D0	Added the following policy statement "DynMcDermott operates only in an environmentally responsible manner." (3.1) Added 4.C.[1]h. which states that the environmental manager will "assign a person to fill the role of environmental management system coordinator." Changed paragraphs are marked with a revision bar in the right margin.	2/10/00
C0	Completely revised in a new format. Revised the reference list. Incorporated material to conform to the ISO 14001 standard. Incorporated policy on waste management in section 3. Added project manager responsibilities. Added environmental manager responsibility. Added Human Resources and Development and Information Systems responsibilities. Added responsibilities of managers and employees. Changed paragraphs are marked with a revision bar in the right margin.	7/27/98

Version	Description	Effective Date
B0	Revised the reference list and added definitions. Incorporated recent regulatory pollution prevention guidelines. Added policy on waste management. Changed project manager responsibilities to ES&H director. Revised responsibilities of the environmental manager and Operations and Maintenance. Added responsibilities for Engineering and Construction and Quality Assurance. Placed responsibilities of the subcontract manager's technical representative in a separate list.	10/18/96
A0	New document.	12/17/93

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