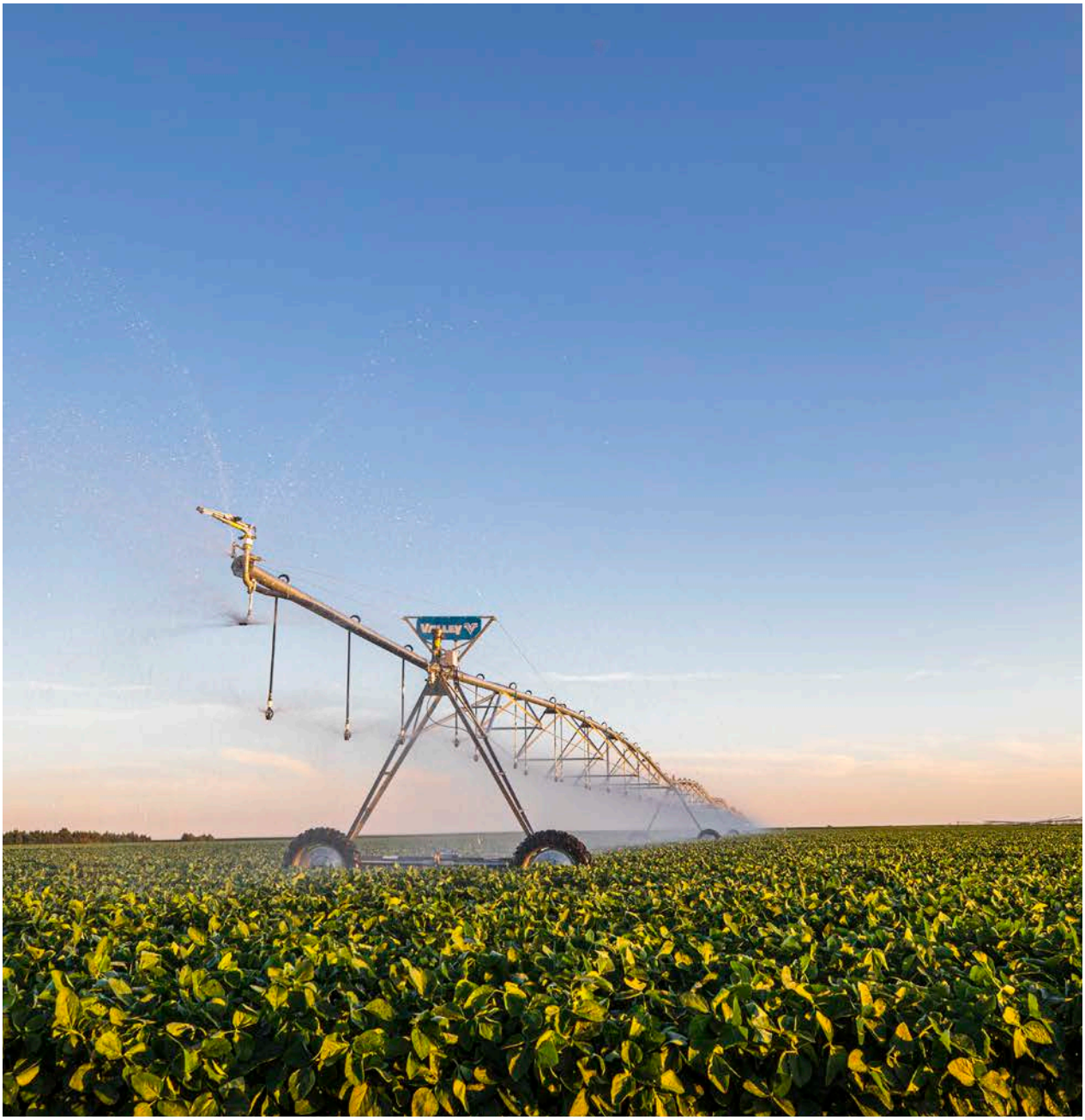
valmont

ENVIRONMENTAL RESPONSIBILITY AND SUSTAINABILITY PLAYBOOK

Prepared by the Environmental Responsibility and Sustainability Support Team

ENTERPRISE-WIDE ENVIRONMENTAL POLICY

Valmont® Industries is committed to conserving resources and continuously improving our environmental performance and its impacts on our employees, customers and com- munities. To meet this challenge we will strive to use the natural resources we consume including raw materials, energy and water as efficiently as possible with a commitment to continuous improvement. We will work to fully quantify and reduce the emissions, discharges and wastes our operations generate and will comply with all applicable environmental laws and regulations.



MISSION STATEMENT

The Mission of the Environmental Responsibility and Sustainability Support Team (ERSST) is to support the implementation of sound environmental management practices at our businesses worldwide.

We aim to fulfill this mission by:

- Providing Valmont® operations tools to determine their impacts on the environment so that they can comply with regulatory requirements, conserve natural resources, and better under- stand their relationship with surrounding communities;
- Providing useful and timely training to assist Valmont businesses in fulfilling their environmental responsibilities;
- Supporting our businesses' efforts to effectively manage significant environmental challenges such as complex historical contamination or emergency response; and
- Leading environmental due diligence efforts related to acquisitions and divestitures

EMERGENCY

The Environmental Responsibility and Sustainability Support Team **(ERSST)** may be contacted at:

Cliff Fleener, Corporate Director of Environmental Responsibility:
+1-402-359-6119
+1-402-657-5518 (Cell)

Mitch Jensen, Environmental Analytics and Training Manager:
+1-402-359-2201, ext. 3303
+1-402-206-9210 (Cell)

Michael Slaton. Division Environmental Manager
+1-423-653-8054 (Cell)

Caleb Hunt, Corporate Environmental Systems Manager:
+1-402-315-8757 (Cell)

General Contact Number:
+1-402-359-2201, ext. 3916

The following **Environmental Events** listed below require **Site Managers** to immediately notify their Division President and the Corporate Director of Environmental Responsibility, through the **Valmont® Global EHS Reporting system (Intelex)**, or other means if necessary.

- Any spill or release of a hazardous substance requiring notification of a regulatory authority.
- Any law enforcement action related to the environment.
- Any event that may give rise to significant environmental consequences, violations and/or penalties, or is reported in the media.

The incidents outlined above are not intended to be all-inclusive, and **Site Managers** are encouraged to provide notification of any serious environmental matter.

Sites should also notify local emergency response authorities as required by law.

Sites with prearranged agreements with emergency response contractors also should contact them as appropriate.

INTRODUCTION

The Environmental Responsibility and Sustainability Playbook (Playbook) has been developed by the Environmental Responsibility and Sustainability Support Team **(ERSST)** to provide a common process to support Valmont® businesses in meeting their environmental and **Sustainability** responsibilities and goals.

Access to the Playbook is provided through the **ERSST's Toolbox** on Valmont Online (VO).

Site Managers should assess their implementation of the practices set out in the Playbook by using the Playbook Self-Assessment Tool. This tool is available on the **ERSST Toolbox**.

The **ERSST** will support the implementation of the Playbook by providing technical guidance, training materials, templates and best practices on the **ERSST Toolbox**. These additional resources may be accessed by clicking the blue links provided throughout the Playbook (e.g., Compliance Calendar Template).

This Playbook has six sections, each section beginning with an introduction and followed by a de- scription of certain **Best Management Practices** and Initiatives.

Key words have been bolded and are defined in the glossary provided in Appendix A.

TABLE OF CONTENTS

01 Environmental Team Work 6
- Roles & Responsibilities 8
- Green Teams 9
- Valmont® Employee Idea Submittal Forms 10
- Environmantal Contractors/Consultants 11

02 Training 12
- Environmental & Sustainability Training Plan 13
- New Employee Onboarding 14
- Environmental Information Cards/Posters 15

03 Determining How Your Operations Impact the Environment 16
- Segment Analysis 17
- Building & Site Analysis 18
- Environmental Regulatory Self-Assessment 19

04 Global Standards 20
- Emergency Response Plans 22
- Fuel Storage & Dispensing 23
- Spill Response 24
- Hazardous Waste Storage/Accumulation Area 25
- Preventative Maintenance 26
- Soils Management 27
- Storm Weather Management 28

05 Environmental Management 29
- Setting Environmental Objectives and Targets 30
- Compliance Calendar 31
- Environmental & Sustainability Action List 32
- Management of Change 33

06 Reporting 34
- Incident Reporting 36
- Sustainability Metrics 37

01

ENVIRONMENTAL TEAM WORK

01 ENVIRONMENTAL TEAM WORK

Site Managers are responsible for managing the **Environmental Impacts** of their operations.

The **ERSST** and Divisions provide resources to enable **Site Managers** to fulfill their responsibilities.

Site Managers should also leverage the experience and insights of their team members.

This section describes roles and responsibilities and how best to utilize team members' experience and insights, as well as other available resources.

Roles & Responsibilities

Site Managers are responsible for their site's **Environmental Compliance, Risk Management** and **Sustainability**.

Resources and support are provided by **Environmental Coordinators**, Division Environmental Managers and the **ERSST**.

Site Managers are responsible for:

- Identifying their site's **Environmental Impacts** and related regulatory requirements, including required permitting;
- The timely submission of required regulatory reports;
- Measuring environmental performance and providing notification of certain **Environmental Events**;
- Assigning specific environmental responsibilities to specific team members (as documented in Job Descriptions), and ensuring team members are properly trained to fulfill those responsibilities;
- Implementing **Global Standards** and **Best Management Practices**; and
- Establishing and leading a **Green Team**.

The **ERSST** is responsible for:

- Providing Global Standards and Best Management Practices;
- Publishing the ERSST Toolbox and Playbook;
- Providing the training and tools necessary to assist sites and Divisions in meeting their environmental and Sustainability responsibilities; and
- Managing high risk environmental historical contamination and environmental due diligence.

ERRST Toolbox Resources

- Environmental Resource Contact Information
- Template: Environmental Coordinator Job Description
- Tip Sheet: How to Acess and Use Intelex
- New Site Integraton

Green Teams

Green Teams provide an opportunity for team members to collaborate in the identification of environmental improvement opportunities and reduce associated costs. A Green Team (or equivalent) should be established at each site and should meet at least once every two months to identify and implement programs to reduce costs associated with their site's use of natural gas, electricity, water, and the volume of waste to landfill.

To assist the formation and implementation of **Green Teams**, the **ERSST** has developed the additional guidance provided below.

Green Teams should strive to:

- Establish baseline metrics for electricity use, natural gas use, water use, and waste-to-landfill;
- Identify opportunities to reduce **Environmental Impacts** and associated costs;
- Identify opportunities for all employees to participate in meaningful activities to reduce **Environmental Impacts** and associated costs;
- Follow-up on Valmont® Employee Idea Submittal Forms related to **Environmental Impacts** and costs, and verify that those suggestions have been addressed; and
- Celebrate or recognize significant **Sustainability**/cost related milestones.
- A **Green Team's** responsibility can be undertaken by other teams such as Safety, Quality or Lean.

Best Management Practices that can be used to reduce **Environmental Impacts** and costs are provided below.

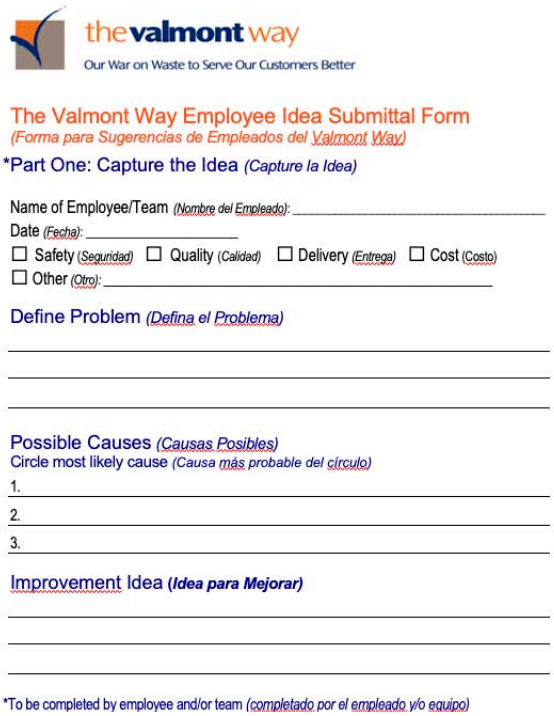
ERRST Toolbox Resources

- Green Team Charter
- Best Management Practices: Electricity
- Best Management Practices: Water
- Best Management Practices: Recycling
- Best Management Practices: Natural Gas
- Site Waste Table Template
- Sustainability Award Application
- Sustainability Playbook
- Tool: Steel Pallet Blueprint

Valmont® Employee Submittal Forms

All employees should be encouraged to use the Valmont® Employee Idea Submittal process to suggest environmental and **Sustainability** improvement ideas.

A site's **Green Team** should address the ideas submitted relating to environmental responsibility and **Sustainability** and should ensure employees receive credible and timely responses to their ideas.



the valmont way
Our War on Waste to Serve Our Customers Better

The Valmont Way Employee Idea Submittal Form
(Forma para Sugerencias de Empleados del Valmont Way)

*Part One: Capture the Idea *(Capture la Idea)*

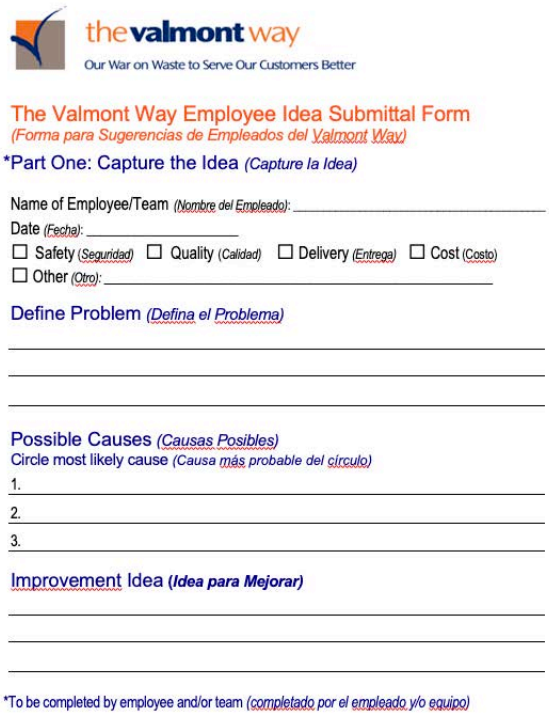
Name of Employee/Team *(Nombre del Empleado)*: _____
Date *(Fecha)*: _____
☐ Safety *(Seguridad)* ☐ Quality *(Calidad)* ☐ Delivery *(Entrega)* ☐ Cost *(Costo)*
☐ Other *(Otro)*: _____

Define Problem *(Defina el Problema)*

Possible Causes *(Causas Posibles)*
Circle most likely cause *(Causa más probable del círculo)*
1.
2.
3.

Improvement Idea ***(Idea para Mejorar)***

*To be completed by employee and/or team *(completado por el empleado y/o equipo)*



the valmont way
Our War on Waste to Serve Our Customers Better

The Valmont Way Employee Idea Submittal Form
(Forma para Sugerencias de Empleados del Valmont Way)

*Part One: Capture the Idea *(Capture la Idea)*

Name of Employee/Team *(Nombre del Empleado)*: _____
Date *(Fecha)*: _____
☐ Safety *(Seguridad)* ☐ Quality *(Calidad)* ☐ Delivery *(Entrega)* ☐ Cost *(Costo)*
☐ Other *(Otro)*: _____

Define Problem *(Defina el Problema)*

Possible Causes *(Causas Posibles)*
Circle most likely cause *(Causa más probable del círculo)*
1.
2.
3.

Improvement Idea ***(Idea para Mejorar)***

*To be completed by employee and/or team *(completado por el empleado y/o equipo)*

ERRST Toolbox Resources

- Valmont Way Employee Idea Submittal Forms

Environmental Contractors/Consultants

From time to time sites may need to hire **Environmental Consultants** or **Environmental Contractors** to complete certain environmental tasks such as the preparation of applications for permits or the design and execution of pollution control measures. The **ERSST** is pleased to help determine the need for consulting services, to assist in finding qualified **Environmental Consultants**, and to assist in contracting with the selected consultant.

A list of preferred consultants and preferred contractors is included in the **ERSST Toolbox**. The **preferred consultants** and **preferred contractors** have entered into a **Master Service Agreement (MSA)** with Valmont® , which includes the legal terms and conditions desired by Valmont. The preferred consultants and preferred contractors can be engaged with a task order that includes an agreed scope of services and costs. The **ERSST** is pleased to assist with the preparation of a task order for a particu- lar engagement.

The **ERSST** can also assist in identifying and engaging consultants / contractors with a required expertise or in a location not covered by a preferred consultant or preferred contractor.

Valmont has one **MSA** designed specifically for U.S. and Canadian locations and a separate **MSA** for use in Australia. Both **MSA's** provide a useful template for use outside of the United States, Canada and Australia. The **ERSST** would be pleased to assist in revising the **MSA** for use internationally by working with the **Legal and Regulatory Compliance Support Team**.

ERRST Toolbox Resources

- How to Select a Consultant Fact Sheet
- Master Service Agreement
- Australian Master Service Agreement
- Preferred Environmental Consultants List
- Preferred Environmental Contractors List

02

TRAINING

02 TRAINING

Training ensures your team members have the knowledge and skills necessary to support your site's fulfillment of its environmental responsibilities.

Tools and materials to help organize and manage a training program are available on the **ERSST Toolbox.**

02 TRAINING

Environmental and Sustainability Training Plan

Site Managers should prepare and review annually a written **Environmental & Sustainability Training Plan**. The Plan should address training requirements for **Environmental Compliance, Risk Management** and **Sustainability**. Training plan templates and samples are provided on the **ERSST Toolbox.**

ERRST Toolbox Resources

- Position Specific Environmental Training Template

New Employee Onboarding

Site Managers should develop a process to provide necessary training for newly hired employees and temporary employees.

The onboarding process should provide basic environmental awareness training appropriate for any person working at the site. Additionally, new employees should receive any position specific training necessary for their particular job within one year of employment.

The **ERSST** is available to assist in creating position specific environmental training resources. An Environmental Onboarding Training Template is available on the **ERSST Toolbox**.

ERRST Toolbox Resources

- Environmental Onboarding Training Template
- Position Specific Environmental Training Template
- Sustainability Course on Valmont® University
  (click on Training Center Icon and search in top right corner for "Sustainability")

Environmental and Sustainability Training Plan

All employees should be reminded of their site's environmental commitments and their individual responsibilities in fulfilling those commitments. Employees can be reminded by providing them an Environmental Information Card or by displaying the same information on Posters. Cards should include the site's environmental policy and/or other pertinent information on one side, and the indi- vidual's (or department's) key environmental responsibilities on the other side.

Templates for Environmental Information Cards and Posters are provided as a link below.

ERRST Toolbox Resources

- Environmental Information Cards Template
- Environmental Information Posters Template
  (MS Publisher file)

03

DETERMINING HOW YOUR OPERATIONS IMPACT THE ENVIRONMENT

03 DETERMINING HOW YOUR OPERATIONS IMPACT THE ENVIRONMENT

Understanding how operations impact the environment is an important first step in managing those impacts. This section explains how to quantify the **Environmental Impacts** of site, buildings and processes through different analyses, and also explains how to identify the regulatory requirements associated with these impacts.

Segment Analysis

An environmental **Segment Analysis** allows **Site Managers** to see how the flow of resources and inputs into their operations impacts the environment. The development of a **Waste Table**, which lists the wastes generated and the requirements associated with the management of resources and inputs is part of a **Segment Analysis.**

Site management should prepare and/or review annually a **Segment Analysis** for their site. Instructions on how to complete a **Segment Analysis** and a helpful template are available below.

ERRST Toolbox Resources

- Instructions on Conducting a Segment Analysis
- Segment Analysis Template
- Waste Table Template
- Galvanizing Emissions Estimation Manual

Building and Site Analysis

Sites and buildings have **Environmental Impacts** and costs independent from the manufacturing processes undertaken on the site and/or in the buildings.

Each **Site Manager** should prepare and/or review a Building & Site Analysis annually.

Instructions on how to complete a **Building & Site Analysis** and a helpful checklist are available below.

ERRST Toolbox Resources

- Building Envelope Analysis Tool

  (Instructions and Checklist)

Environmental Regulatory Self-Assessment

Once a **Segment Analysis** and a **Building & Site Analysis** have been completed for a site, **Site Managers** should determine the site's compliance requirements in one of the two following ways:

- If available, the **Site Managers** should utilize **Enhesa®**, an online tool that can be accessed through the **ERSST Toolbox**. The first step in using **Enhesa®** is to complete the **Enhesa®** Applicability Questionnaire.
- If **Enhesa®** is not available, the **ERSST** will assist in determining a site's compliance requirements. The first step in doing so will be to complete the Environmental Compliance Self-Asessment Checklist provided below.

ERRST Toolbox Resources

- Environmental Compliance Self-Assessment Checklist (US Natl Enhesa® ScoreCard)
- Instruction on How to Access the Enhesa® ScoreCards
- How to Use Enhesa® ScoreCards within the Global Reporting System
- Enhesa® Applicability Questionnaire

04

GLOBAL STANDARDS

04 GLOBAL STANDARDS

Valmont® **Global Standards** describe the practices to be employed at Valmont sites to address the most common environmental risks.

Site Managers are responsible for achieving the **Global Standards**, and the **ERSST** has developed tools and training to assist in doing so.

The **Global Standards** may not be as stringent as local regulatory requirements. Consequently, **Site Managers** should also be sure to comply with local regulatory requirements.

Global Standard: Emergency Response Plans

Each manufacturing site should develop an **Emergency Response Plan.** In many cases, sites may have contingency plans, emergency action plans, or spill control and countermeasure plans already in place. These will meet the requirements of this **Global Standard** as long as they include:

- Name and contact information of employees responsible for emergency response;
- Instructions for when and how to make required regulatory notifications together with contact information;
- Name and contact information of preferred emergency response contractors;
- Detailed information concerning the inventories and locations of hazardous or **high risk materials**;
- A map of the site's storm water drains and storm water outfalls;
- Written procedures for responding to spills of hazardous or **high risk materials**; and
- Identification of designated evacuation areas.

The **Emergency Response Plan** should be in writing and should be easily accessible to all employees. The **ERSST** is available to assist in preparing an **Emergency Response Plan**. An example is provided below.

ERRST Toolbox Resources
• Example of Emergency Response Plan

Global Standard: Fuel Storage and Dispensing

The spill of liquid transportation fuels (diesel/gasoline) is an environmental risk common to most Valmont® sites. **Site Managers** should ensure the following practices (as described more fully in the **Global Standard** provided below) are employed at their sites:

- Fuel storage tanks should not be located within 10 meters (30 feet) from the site's boundaries.
- All fuel storage tanks should be double-walled or have secondary containment enclosures.
- All fuel storage tanks should have a quick disconnect and emergency stop control.
- Proper signage should be in place for all fuel storage tanks.
- Approved fire extinguisher(s) and spill control kit(s) should be located at all fuel storage tanks.
- Fuel dispensing areas should be paved with a rain cover over the secondary containment area, and should be properly illuminated for night-time dispensing, spill response, and acess control.
- All handheld fuel dispensing containers should be stored in an approved fireproof storagelocker.

All Underground Storage Tanks must be reported to the ERSST immediately so removal can be undertaken. The ERSST is available to assist in the oversight for removal of Underground Storage Tanks. (Online UST Reporting Form)

ERRST Toolbox Resources

- Global Standard: Fuel Storage & Dispensing, with Visual Standards
- Best Practice: Fuel Transfer Point Spill Containment

Global Standard: Spill Response

Response to certain spills should be in accordance with the site's **Emergency Response Plan**, which should identify spills requiring **Regulatory Notification** and how to make the required notification.

Spills that do not require **Regulatory Notification** should nonetheless be managed properly and in some instances should be managed by environmental contractors. **Site Managers** should prepare or review annually a Spill Risk Assessment for their site, a template and example are provided below.

Spills are categorized according to the Severity Levels defined below:

- Level 1 – spills that are not reportable to a regulatory agency and that do not leave the property.
- Level 2 – spills that are reportable to a regulatory agency and / or leave the property.

Any reportable and/or offsite spills with Severity Level 2 **must** be reported through the Valmont® Global EHS Reporting System.

Severity Level 1 spills may be reported in the Global EHS Reporting System; however it is not required. All Level 1 spills reported in Intelex shall be reviewed by a Corporate or Divisional Environmental Manager.

Training materials for non-reportable spill response are provided below.

Compliance with the Spill Response Global Standard requires:

- **Site Managers** should prepare or review annually a **Spill Risk Assessment**.
- **Site Managers** should prepare and maintain a map identifying high risk spill locations.
- S**ite Managers** should prepare or review annually an **Emergency Response Plan**.
- Appropriate spill kits should be readily accessible at all high risk spill locations.
- Personnel loading or offloading high risk liquids should be trained annually on how to use a spill kit and how to dispose of spilled and/or contaminated material.

ERRST Toolbox Resources

- How to Report an Environmental Incident using the Global EHS Reporting System
- Example of Emergency Response Plan
- Spill Risk Assessment
- Spill Kit Requirements
- Non-Reportable Spill Response Training Module

Global Standard: Hazardous Waste Storage/Accumulation Area

The storage and accumulation of Hazardous Wastes should comply with all regulatory requirements as well as the following standards:

- **Site Managers** should maintain a map identifying the locations of all hazardous waste storage/accumulation areas. An example is provided below.
- **Site Managers** should prepare or review annually an **Emergency Response Plan**.
- All storage/accumulation areas should be sited and constructed in conformity with all regulatory requirements as well as the Siting/Structure of Hazardous Waste Storage/Accumulation Areas standards provided below.
- **Site Managers** should identify and comply with all regulatory requirements governing the proper labelling and storage or accumulation of Hazardous Wastes. The **ERSST** would be pleased to assist sites in identifying those requirements.
- Signage indicating who at the site is responsible for the storage/accumulation area should be visible at the area, together with their phone number.
- A photo or diagram showing the proper use and condition of the storage/accumulation area, as well as the regulatory required labeling, should be visible at the area.

ERRST Toolbox Resources

- Minimum Global Standards for the Siting/Structure of Hazardous Waste Storage/Accumulation Areas
- Example of Hazardous Waste Storage/Accumulation Areas Map
- Examples of Waste Storage/Accumulation Area Signage/Visual Factory Standards
- Hazardous Waste Storage Training - Brief
- Hazardous Waste Structural Standard Training

Global Standard: Preventive Maintenance

The effective use of Pollution Control Equipment is essential to the management of certain Environmental Impacts. Such equipment is effective only if properly maintained and operated.

The operation and maintenance of Pollution Control Equipment should comply with all regulatory requirements as well as the following standards:

- **Pollution Control Equipment** should be included and inventoried in the site's preventative maintenance system and should be properly maintained in accordance with that system.
- The individual(s) responsible for the maintenance of **Pollution Control Equipment** should be provided appropriate training and / or maintenance schedules for the maintenance of the equipment.
- The correct operating parameters for **Pollution Control Equipment** should be visible on the equipment's instrumentation (e.g. pressure gauges on bag houses). An example is provided below.
- Signage indicating who is responsible for the operation and maintenance of **Pollution Control Equipment** should be visible, together with their contact phone number.
- All regulatory required calibration data and preventative maintenance records for **Pollution Control Equipment** should be timely maintained and readily available for inspection.

ERRST Toolbox Resources

- Examples: Signage and Instrumentation Parameter Marking
- Calibration Documentation Spreadsheet

Global Standard: Soils Management

Soils located onsite or elsewhere may have been impacted by certain materials (e.g. petroleum residues, metals, etc.).

Site Managers are responsible for ensuring any soils brought onsite have not been impacted, and should require all suppliers to provide documentation certifying soils are not impacted.

Soils excavated onsite should be retained onsite whenever possible. A tool entitled **Soils Risk Assessment** is provided below to assist in planning prior to excavation.

The disposal of soils offsite can result in future liabilities, particularly if not managed properly. **Site Managers** should undertake a **Soils Risk Assessment** for any soils to be removed from site in accordance with the **Soils Risk Assessment** provided below. **Site Managers** should advise their Divisional Environmental Manager and the **ERSST** of their assessment and of their proposed disposal plan. All impacted soils must be disposed at a waste facility permitted to receive such soils.

All certifications received for soils brought onsite and all **Soils Risk Assessments** should be maintained indefinitely.

ERRST Toolbox Resources

- Soils Risk Assessment
- Clean Fill Specification Form

Global Standard: Storm Water Management

Storm water may be the most significant environmental risk at many Valmont® sites.

As part of their **Building & Site Analysis, Site Managers** should identify the regulatory requirements governing the management of storm water on their sites (e.g. retention, sampling, etc.).

In addition, all sites should have a Storm Water Management Plan, which should include the following:

- A map indicating:
  - The storm drains located on the site and where the storm drains discharge;
  - Receptors for the site's storm water (e.g. retention ponds, local streams, etc.);
  - Storm water flow direction on the site; and
  - Areas likely to impact storm water (e.g. road salt storage, soils stock piles, fuel storage and dispensing areas, etc.).
- Description of the **Best Management Practices** necessary to properly address possible storm water impacts.
- All storm water permits or SPCC plans should be entered into the Intelex Permit Module.

Information on how to develop a Storm Water Management Plan, including how to map storm water outlets, flow direction and **Best Management Practices** is included in the tools below.

ERRST Toolbox Resources

- Best Management Practices for Storm Water Management
- Fact Sheet on How to Identify Your Storm Drains and Outfalls
- Storm Water Outfall Identification Training
- Sample Storm Water Management Plan
- How to Enter Storm Water Permits into the Intelex Permit Module

05

ENVIRONMENTAL MANAGEMENT

05 ENVIRONMENTAL MANAGEMENT

Having identified the Environmental Impacts created by a site, as well as the resources, teams, training and Global Standards necessary to manage them, **Site Managers** should employ the tools described in this section to manage their environmental responsibilities:

- Setting Environmental Objectives & Targets;
- A Compliance Calendar; and
- An Environmental & Sustainability Action List.

Setting Environmental Objective and Targets

Site Managers should develop annual Environmental Objectives & Targets for incorporation in their Annual Operating Plan and in their Environmental & Sustainability Action List. Environmental Objectives & Targets should address:

- Gap closure activities identified through the site's Environmental Regulatory Self-Assessment and the site's Playbook Self-Assessment;
- Completion of required compliance activities;
- Completion of required training activities;
- Completion of required preventive maintenance activities; and
- Completion of other environmental or Sustainability initiatives identified by the Division or business unit.

Below is an Environmental Objectives & Target Template, as well as the Environmental Regulatory Self-Assessment Checklist that can be used to establish Environmental Objectives & Targets.

ERRST Toolbox Resources

- Environmental Objectives & Targets Template and Instructions
- Compliance Calendar Template
- Environmental Regulatory Self-Assessment Checklist (US Natl Enhesa® ScoreCard)
- Playbook Self-Assessment

Compliance Calendar

The site's Environmental Coordinator should prepare/update a Compliance Calendar annually to facilitate compliance with environmental requirements. The Compliance Calendar should consist of a list of environmental regulatory tasks and submittals, including what they are and when they are due to a regulatory agency.

The site compliance calendar should be entered into the Global Reporting System.

A Compliance Calendar Template is provided below.

ERRST Toolbox Resources

- Compliance Calendar Template
- How to Use Enhesa® ScoreCards within the Global Reporting System

Environmental and Sustainability Action List

Environmental Coordinators should prepare annually an **Environmental & Sustainability Action List (ESAL)** in the Inspections module of the Global EHS Reporting System (Intelex). An **ESAL** is a system- atic compilation of the tasks required to:

- Close gaps identified through the site's **Environmental Self-Assessments, Building and Site Analysis, Segment Analysis**, and audits;
- Achieve the site's **Environmental Objectives & Targets**; and
- Support the site's Compliance Calendar.

Each item included on the **ESAL** should be assigned a responsible person and timeframe for completion. All items should be addressed as soon as practical during the year; however, any matter posing a threat or potential threat to human health, significant regulatory violations, or significant impacts to the environment, should be addressed immediately.

ERRST Toolbox Resources

- Environmental & Sustainability Action List Template

Management of Change

Site Managers should prepare a Management of Change (MOC) Tool every time a process or piece of equipment is added or significantly changed at a site. The MOC process ensures that impacts to the environment from process or equipment changes are documented, and their regulatory and **Environmental Impacts** are properly managed, including:

- Impacts to Air Emissions
- Impacts to Process Water Discharge
- Impacts to Storm Water Discharge
- Impact to the Quantity or Type of Waste Generated

The Management of Change (MOC) Tool is available below, and the **ERSST** is pleased to assist sites in using the Tool.

ERRST Toolbox Resources
• Management of Change Tool

06

REPORTING

06 REPORTING

Timely reporting of environmental information as described in this section will help us better communicate with the public, our employees and our regulators. The reported information also provides a starting point for continuous improvement.

Incident Reporting

Site Managers should notify their Division President, Divisional Environmental Manager and the **ERSST** of any of the **Environmental Events** listed below:

- Receipt of a request for information or discovery from a regulatory agency;
- Environmental violations that could result in penalties;
- Any notification of an alleged liability for environmental health risks;
- Inspections by regulatory agencies and the findings and outcomes; and
- Inquiries / requests from news media, public officials or the general public.

Notification helps ensure the **ERSST** is able to assist in a coordinated and comprehensive manner. Immediate notification should be made through the External Engagement application located in the Global EHS Reporting System (Intelex) within 24 hours of the initial engagement (reference the Tip Sheets below). Also provided below is a fact sheet addressing how to interact with regulatory authorities during a site visit.

The **ERSST** may be contacted at:

Cliff Fleener, Corporate Director of Environmental Responsibility:

+1-402-359-6119

+1-402-657-5518 (Cell)

Mitch Jensen, Environmental Analytics and Training Manager:

+1-402-359-2201, ext. 3303

+1-402-206-9210 (Cell)

Michael Slaton, Division Environmental Manager

+1-423-653-8054 (Cell)

Caleb Hunt, Corporate Environmental Systems Manager:

+1-402-315-8757 (Cell)

General Contact Number:

+1-402-359-2201, ext. 3916

ERRST Toolbox Resources

- Environmental Resource Contact Information
- Environmental Regulatory Contact and Inspection Fact Sheet and Incident Report Form
- Tip Sheets: Enter a New External Engagement, Follow-Up an External Engagement

Sustainability Metrics

Valmont® has embarked upon a **Sustainability Initiative**, as described in the White Paper provided be- low. Our **Sustainability Initiative** presently focuses on natural resource conservation, and our ambi- tion is to measure and continuously improve our use of certain natural resources.

Our most significant natural resource usages relate to natural gas, electricity, water, and waste sent to landfills. Consequently, a first step toward our **Sustainability Initiative** will be to measure the follow- ing metrics:

- Natural gas usage;
- Electricity usage;
- Water usage;
- Waste sent to landfill generation;
- Hazardous waste shipped for disposal; and
- Other transportation fuels (gasoline, diesel, fuel oil, propane, LPG).

Site Managers are responsible for ensuring these metrics are gathered monthly at their sites and promptly reported to the **ERSST** through Valmont Global EHS Reporting System. The **ERSST** will share the information gathered so sites may benchmark their performance.

Green Teams should monitor these metrics and establish goals and targets for improving perfor- mance. A board tracking these metrics should be posted showing monthly results. The **ERSST** will share **Best Management Practices** through the **ERSST Toolbox.**

ERRST Toolbox Resources

- Valmont Sustainability White Paper
- Metrics Reporting Portal
- Example of Metrics Tracking Board
- How to Enter your Sustainability Metrics into Intelex

APPENDIX A: GLOSSARY

Best Management Practices: A method which is used to improve environmental / Sustainability performance.

Building & Site Analysis: A systematic review and identification of a site's infrastructure and ancillary equipment with regard to performance of water, electricity and natural gas consumption.

Corrective Action: A strategy, device or procedure that rectifies a deficiency noted in a site's **Environmental & Sustainability Action List**.

Emergency Response Plan: A plan of action for the efficient deployment and coordination of ser- vices, agencies and personnel to provide the earliest possible response to an emergency.

Enhesa®: A compliance content website that identifies a site's environmental regulatory requirements.

Environmental Compliance: Compliance with legal requirements associated with the generation and management of discharges, emissions and wastes.

Environmental Consultant: A third-party service provider hired for specific environmental expertise.

Environmental Contractor: A third-party service provider that conducts specialized services related to spill response, remediation and energy remediation.

Environmental Coordinator: Designated role at a site focused on the management of Environmental and Sustainability.

Environmental Event: Any of the following: i) receipt of a request for information or discovery from a regulatory agency; ii) environmental violations that could result in penalties; iii) any notification of an alleged liability for environmental health risks; iv) inspections by regulatory agencies and the findings and outcomes; and v) inquiries / requests from news media or public officials.

Environmental Impacts: The effects a site has on air, water, resources, people and community.

Environmental Objectives and Targets: Overall environmental goals which are quantifiable, where possible.

Environmental & Sustainability Action List: A list of actions to address gaps identified in the Environ- mental and Sustainability program, including responsible individuals and dates for completion.

Environmental & Sustainability Training Plan: A list of the training determined by a **Site Manager** to be necessary for his / her team.

ERSST: The Environmental Responsibility **Sustainability** and Support Team.

ERSST's Toolbox: The ERSST's online resource that includes tools, templates and other information to assist Valmont® businesses to meet their environmental and **Sustainability** responsibilities.

APPENDIX A: GLOSSARY

Global Standard: Set policy or procedure all operations should meet.

Green Teams: A group of individuals with the goal of identifying opportunities to improve Environ- mental and Sustainability performance.

Hazardous Wastes: A class of waste designated by a regulatory authority as harmful and requiring specific handling and disposition.

High Risk Materials: Items potentially posing environmental or human health risks.

Legal and Regulatory Compliance Support Team: The team led by the Valmont® Chief Legal Counsel.

Management of Change Tool: Mechanism for the review and approval of process and facility modifications.

Master Service Agreement (MSA): An agreement designed to engage **Environmental Contractors and Environmental Consultants.**

Pollution Control Equipment: A device that mitigates a permitted emission or release (e.g., bag house) or measures a regulated parameter (e.g., pH meter).

Preventative Action: A preventative action reduces the risk of a regulatory violation or other negative outcome.

Regulatory Notification: Any correspondence received from government officials or their representa- tives requesting information.

Risk Management: The management of certain actions or programs designed to reduce the likelihood of a potential negative outcome or reduce the severity of a negative outcome after it has occurred.

Segment Analysis: The systematic review and identification of process inputs and outputs focusing on regulated emissions and / or wastes.

Site Manager: The senior most person located at a site, typically, a general manager, plant manager or operations manager.

Soils Risk Assessment: A systematic process to determine management requirements for soil removal/ disposal.

Spill Risk Assessment: An analysis of the site's high-risk materials (such as fuels or bulk chemicals) that if spilled pose a threat to human health, property and/or the environment.

Sustainability: The management of a business that achieves its goals without compromising the ability of future generations to do the same.

APPENDIX A: GLOSSARY

Sustainability Initiative: The Valmont® five year plan to develop a high quality global program focused on the efficient use of electricity, natural gas, water, along with waste reduction and recycling.

Task Order: An order that sets out the intended scope of work and agreed cost, issued pursuant to an approved **MSA**.

Valmont EHS Incident Reporting System: The Valmont global intranet-based communication system focused on Environmental, Health and Safety requirements.

Waste Table: A list of regulated wastes derived from a **Segment Analysis**.