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ECAP

# ENVIRONMENTAL COMPLIANCE AWARENESS PROGRAM

August 22, 2017



## ENVIRONMENTAL COMPLIANCE AWARENESS PROGRAM POLICY

Protecting and responsibly managing natural resources are critical to the quality of life in the areas we serve, the environment in which live and the continued success of our company and its operating units. For those reasons Quanta Services is committed to conducting our business with care and respect for the environment. To fulfill our commitment to the environment, Quanta Services will adhere to the following principles through the development and implementation of our Environmental Compliance Awareness Program (ECAP) for our operations:

### OUR PRINCIPLES

#### Compliance

We will identify applicable environmental laws and regulations and implement programs, policies and procedures to assure compliance.

#### Prevention

We will employ systems and procedures designed to minimize activities and conditions that pose a threat to the environment. We will strive to prevent unauthorized releases to the atmosphere, land, and water. We will ensure the safe treatment and disposal of waste.

#### Continuous Improvement

We will continually review our programs, policies, procedures, and behaviors to identify areas in which we can improve our adherence to these principles and to our commitment to the protection of the environment

#### Communication

We will communicate our commitment to the protection of the environment to our employees, contractors, customers and external stakeholders.

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#### Duke Austin

Chief Executive Officer &  
Chief Operating Officer

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#### Derrick Jensen

Chief Financial Officer



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## 1.0 INTRODUCTION

The purpose of this document is to formalize the Environmental Compliance Awareness Program (ECAP) for Quanta Services. The ECAP is an Environmental Management System developed to manage the environmental aspects of Quanta operations.

This ECAP is a framework that promotes consistent and effective management of environmental issues by utilizing a systematic approach to planning, performing, measuring, and improving the environmental performance of Quanta Services. As a work-in-progress, Quanta Services strives to meet all expectations in this document. The timing and the degree to which each expectation is or will be met is dependent upon the relative priority of the expectation in relation to the achievement of Quanta Services' environmental objectives and goals.

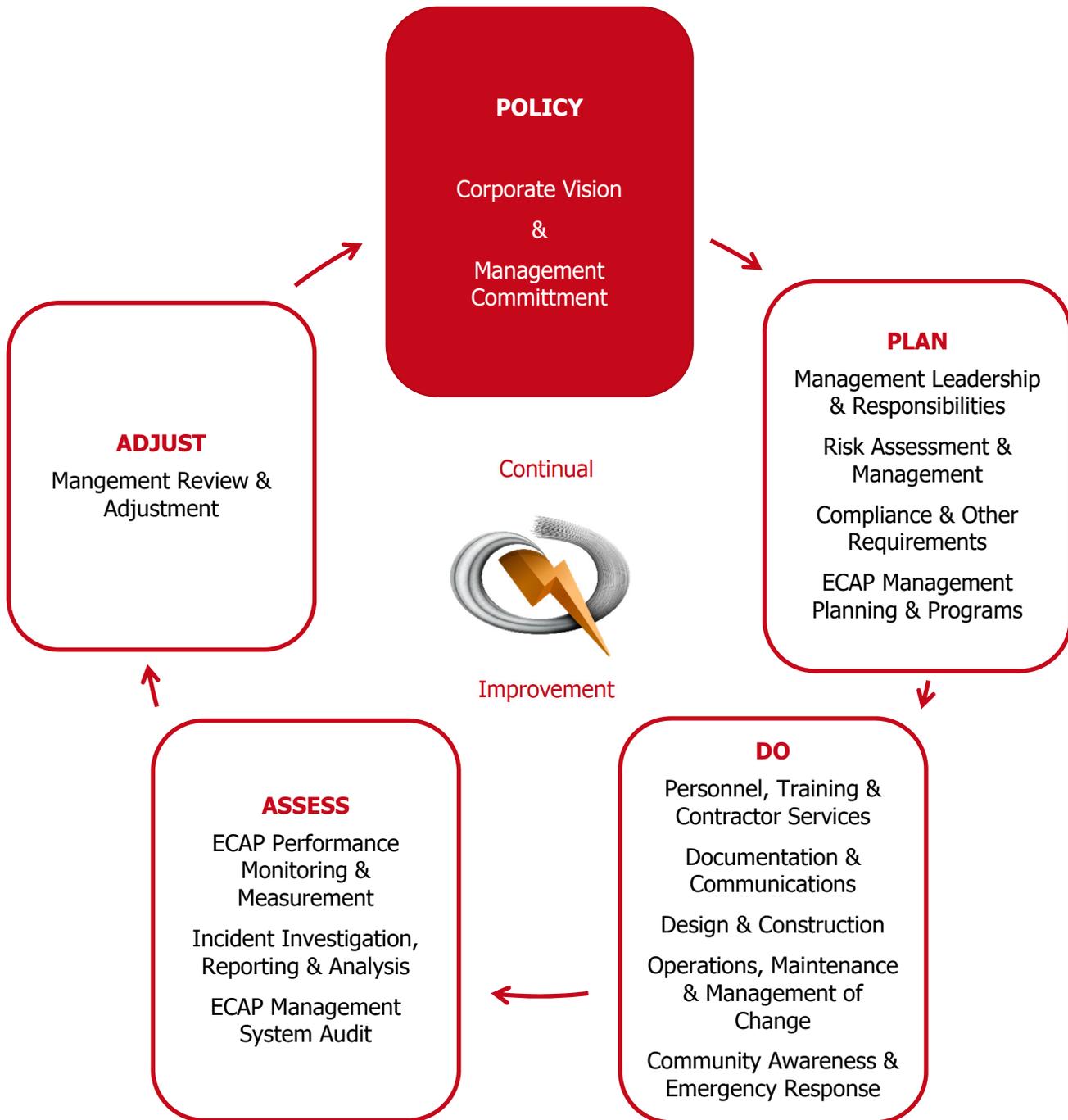
This ECAP utilizes a quality systems approach for continual improvement. This system closely follows the thirteen (13) elements of the American Petroleum Institute (API) Safety and Environmental Management System (SEMS) model. The API SEMS Model is organized around the following protocol for cyclical process improvement:

- Policy & Planning (Plan)
- Implementation & Operations (Do)
- Measurement & Auditing (Assess)
- Management Review & Continual Improvement (Adjust)

FIGURE 1 depicts the Quanta Services' ECAP Model. The thirteen (13) elements of the ECAP model are illustrated within their respective positions relative to the continual improvement cycle. Quanta Services utilizes this model by taking experiences and knowledge gained from each improvement cycle and adjusting planned expectations for the next cycle.



**FIGURE 1.**  
QUANTA SERVICES – ECAP MODEL





## 1.1 **MANAGEMENT LEADERSHIP & RESPONSIBILITIES**

The Environmental Policy, as stated on the backside of the document cover, establishes Quanta Services' current position regarding management of the environmental aspects of its operations. Policies and procedures for the ECAP are developed as needed. These policies and procedures define specific roles and responsibilities of management and employees. The Environmental Policy is based on the following pillars: Compliance, Pollution Prevention, Continual Improvement and Communication (both Internal and External).

To achieve policy goals, Quanta Services is committed to the following:

- Affirming our commitment to the protection of the environment;
- Providing a unifying vision of Environmental Stewardship to our organization;
- Utilizing this ECAP when developing operational plans and actions; and
- Driving company efforts for continual environmental improvement.

For implementation of the ECAP, Quanta has established a program to define and communicate the roles and responsibilities with respect to environmental issues throughout the company. Upon implementation, Quanta expects that all employees are committed to this policy and the elements of this ECAP. Therefore, the goal of the ECAP is to establish policies, procedures and programs for effective management leadership in relation to environmental issues.

## 1.2 **RISK ASSESSMENT & MANAGEMENT**

Quanta Services is committed to establishing procedures that allow for the identification, assessment and ranking of environmental impacts and that develop prevention and mitigation measures for ongoing management of those risks. Therefore, the goal of the ECAP is to establish policies, procedures and programs for effective assessment and management of environmental risks.

## 1.3 **COMPLIANCE REQUIREMENTS**

Quanta Services is committed to identifying, complying with, and communicating applicable legal regulatory requirements and ensuring that those requirements are incorporated into relevant company procedures and programs. Therefore, the goal of the ECAP is to develop policies, procedures and programs that ensure effective management of environmental compliance requirements.



#### **1.4 MANAGEMENT PLANNING & PROGRAMS**

Quanta Services is committed to establishing and incorporating environmental performance objectives and targets into its strategic plans, including timeframes and milestone events. Therefore, the goal of the ECAP is to develop policies, procedures and programs for effective management planning and management programs.

#### **1.5 PERSONNEL, TRAINING & CONTRACTOR SERVICES**

Quanta Services is committed to ensuring that its employees and contractors have the knowledge and skills necessary to achieve the company's environmental objectives. Therefore, the goal of the ECAP is to develop policies, procedures and programs for effective training of personnel, including contractors.

#### **1.6 DOCUMENTATION & COMMUNICATIONS**

Quanta Services is committed to documenting and communicating information related to the ECAP to support employee awareness of the company's environmental objectives, to enable evaluation and improvement of the ECAP and to encourage acceptance of the company's efforts to improve its environmental performance. Therefore, the goal of the ECAP is to develop policies, procedures and programs for effective communications and document control.

#### **1.7 DESIGN & CONSTRUCTION**

Quanta Services is committed to considering and addressing environmental aspects during the design and construction of its facilities to enhance the company's environmental performance. Therefore, the goal of the ECAP is to develop policies, procedures and programs for effectively considering and managing the environmental aspects during design and construction.

#### **1.8 OPERATIONS, MAINTENANCE & MANAGEMENT OF CHANGE**

Quanta Services is committed to implementing the ECAP through operational controls, including its maintenance programs and its change management system. Therefore, the goal of the ECAP is to develop policies, procedures and programs for effective management of operational and maintenance activities and for effective management of changes.



## 1.9 **EMERGENCY RESPONSE & COMMUNITY AWARENESS**

Quanta Services is committed to establishing and ensuring appropriate response to unexpected incidents due to abnormal operating conditions, accidents and other potential emergency situations. Therefore, the goal of the ECAP is to develop policies, procedures and programs that ensure preparation for and effective management of emergency situations.

## 1.10 **PERFORMANCE MONITORING & MEASUREMENT**

Quanta Services is committed to measuring and monitoring the company's actual performance against the company's ECAP targets and goals. Therefore, the goal of the ECAP is to develop policies, procedures and programs for effective measurement and monitoring of environmental programs.

## 1.11 **INCIDENT INVESTIGATION, REPORTING & ANALYSIS**

Quanta Services is committed to investigating, analyzing and reporting (as appropriate) environmental incidents involving regulatory compliance and significant environmental near-misses. Therefore, the goal of the ECAP is to develop policies, procedures and programs for effective incident management.

## 1.12 **ENVIRONMENTAL MANAGEMENT SYSTEM AUDIT**

Quanta Services is committed to performing objective audits of the ECAP on a periodic basis to determine whether the system conforms to planned arrangements and has been properly implemented and maintained. Therefore, the goal of the ECAP is to develop policies, procedures and programs for the performance of audits and corrective actions, as required.

## 1.13 **MANAGEMENT REVIEW & ADJUSTMENT**

Quanta Services is committed to continually improving the ECAP's effectiveness and quality based on findings from the ECAP system audits. Therefore, the goal of the ECAP is to develop policies, procedures and programs for adjusting the ECAP based on management review.



## 2.0 CROSS REFERENCES

Model Environmental Management Systems include the American Petroleum Institute (API) Safety and Environmental Management System, which serves as the basis of Quanta's ECAP model, and United States Environmental Protection Agency Environmental Management System Model. The International Organization for Standardization (ISO) maintains a standard that provides organizations with a framework to protect the environment and respond to changing environmental conditions in balance with socio-economic needs. **TABLE 1** provides a cross-reference below for the ECAP.



**TABLE 1.**  
CROSS-REFERENCE FOR MODELS & ISO STANDARD

ECAP Section	API SEMS Element	EPA/EMS Element	ISO14001-2015 Standard
Environmental Policy		Environmental Policy	5.2
Introduction			1.0 4.1 4.2 4.3 4.4
Management Leadership & Responsibilities	3.1	Objectives & Targets	5.1 5.2 5.3
Risk Assessment & Management	3.2	Environmental Aspects	4.1 6.1 6.2
Compliance Requirements	3.3	Legal & Other Requirements, Environmental Management Program	
Management Planning & Programs	3.4		
Personnel, Training & Contractor Services	3.5	Structure & Responsibility, Training, Awareness & Competence	7.1 7.2
Documentation & Control	3.6	Communication, EMS Documentation, Document Control, Records	7.3 7.4 7.5
Design & Construction	3.7	Operational Control	8.1
Operations, Maintenance & Management of Change	3.8	Operational Control	8.1
Emergency Response & Community Awareness	3.9	Emergency Preparedness & Response	8.2
Performance Monitoring & Measurement	3.10	Monitoring & Measurement	9.1
Incident Investigation, Reporting & Analysis	3.11	Nonconformance & Corrective & Preventative Action	
Environmental Management System Audit	3.12	EMS Audit	9.2 10.1 10.2
Management Review & Adjustment	3.13	Management Review	9.3 10.3

