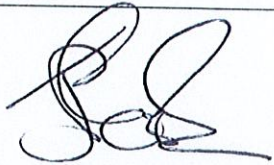
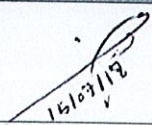
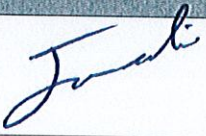
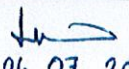
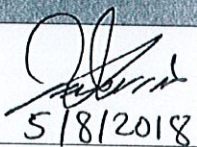



QAPCO
شركة قطر للبترول كيمائيات
QATAR PETROCHEMICAL COMPANY

ENVIRONMENTAL PROTECTION IN QAPCO, CONTRACTORS & SUPPLIERS

Instruction Number: INS-253-ENV-02

Approved by	Name	JONATHAN PETER COOK	
	Position	CHIEF HSSE OFFICER	
	Date	15/8/2018	

Rev.	Date	Prepared by	Reviewed by		
00	July 2018	 16/07/18 SE Manager	 TGM	 26.07.2018 MGM (Vinyl)	 5/8/2018 MGM (PE/SC)

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Revision / Modification History

Rev. #	Rev. Date	Section No.	Reason of modification
0	15.07.2018	All	Updated as per New Organization structure and Instruction supersede IN-253-EMS-03

Distribution:

QAPCO Intranet (to all QAPCO staff).

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1.0 PURPOSE

This instruction has been issued to provide the necessary directive to all departments of QAPCO, particularly the technical departments like Production and Maintenance, to enable them to take the appropriate measures to protect the environment as required by QAPCO's HSE Policy.


2.0 SCOPE

This procedure applies to all activities that can interact with and hence have impact on the environment at QAPCO site performed by or on behalf of QAPCO, including those undertaken by Contractors. This procedure identifies the responsibility of different departments regarding industrial wastes management. It describes specifically the steps required to comply with the Ministry of Municipality and Environment (MME) requirements.

3.0 DEFINITIONS

MME	Ministry of Municipality and Environment
Environmental Regulations:	The Executive By-Law for the Environmental Protection Law (specially the Annexes of the By-Law)
Environmental Limits	The limits specified in the relevant Environmental Permits, or in the Environmental Regulations, if applicable.
Pollution Prevention	Use of processes, controls, practices, materials, or products that avoid, reduce or control pollution. Programs associated with pollution prevention include recycling, treatment, process changes, control mechanisms, efficient use of resources, and material substitution.
ERIN	Environmental Release Incident Notification
MIC	Mesaieed Industrial City
I&GSD	Infrastructure and General Services Department
SED	Sustainability and Environment Department
HSSE	Health, Safety, Security and Environment
MGM (SC/PE)	Manufacturing Group Manager, SC/PE
MGM (Vinyl)	Manufacturing Group Manager, Vinyl
TGM	Technical Group Manager
CHSSEO	Chief Health Safety Security & Environment Officer
COO	Chief Operations Officer

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4.0 REFERENCES

The following are the related documents that shall be referred to for further details whenever necessary. These are included in the QAPCO's Environmental Management System:

1. QAPCO/QATOFIN/QVC Consent to Operate
2. INS-253-ENV-04 Environmental Protection Regulations of Qatar
(Executive By-Law for the Environmental Protection Law)
3. INS-253-ENV-03 Environmental Specifications for New Projects.
4. PR-PSS-123 Waste Management Procedure
5. PR-PSS-122 HSSE Risk Assessment
6. PR-PSS-118 HSE Management Programs
7. PR-PSS-115 Env. Monitoring & Evaluation Procedure.

5.0 RESPONSIBILITIES

It is the responsibility of all QAPCO employees and contractors' personnel at QAPCO sites to prevent pollution and protect the Environment. However, the following are responsible for ensuring compliance with the Environmental Protection rules and regulations, as indicated in this instruction.


- Department Managers
- Head of Sections
- Suppliers and Contractors Representatives

6.0 PROCESS

6.1. General

1. All the applicable limits for environmental releases and discharges are given in **Consent to Operate** issued by the MME.
2. All new projects, and internal plant modifications (wherever applicable), shall be implemented in accordance with the Instruction INS-253-ENV-03: Environmental Specifications for New Projects.
3. The list of banned substances is attached as Annex-4. These substances shall not be used in any form, in any process, activity, equipment or material, until approved by the CHSSEO.
4. Use of Asbestos based material is prohibited, until it is proved that any other alternative is not available.
5. For the activities that result in emissions of dust and aerosols, like sand blasting, spray paintings etc., the necessary arrangements shall be made to contain the pollutants to prevent air pollution in the surrounding areas.
6. Water bottles shall not be used to store any liquid other than drinking water. Special attention is needed from all concerned to prevent use of water bottles for keeping oil and grease.

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6.2. Environmental Emissions and Monitoring:

1. Any department / plant / section, which has any environmental emissions due to its activities or processes, shall identify and characterize all such emissions (solid, liquid or gases), and maintain a list of these emissions, which shall be reviewed and updated at least once in a year, or earlier if necessary.
2. The concerned department / plant / section shall ensure that all the emissions related to their activities are monitored at appropriate frequency (should be decided after consulting the SED). It shall also maintain monitoring records of all these emissions.
3. If any emission is not within the legal limits, then the concerned department / plant / section shall initiate the necessary actions to meet the legal requirements and establish an Environmental Management Program (EMP) for the same.

6.3. Waste water

1. QAPCO has separate collection and disposal networks for the following types of wastewaters:
 - a) **Process wastewater:** Collected and treated in Unit-23, 45 & 46.
 - b) **Domestic Wastewater / Sewage:** Collected separately and treated in sewage treatment plant or sent to MIC / external treatment facilities by tankers.
 - c) **Cooling Seawater:** Once through Cooling System, Seawater is discharged back to the sea.
2. No process wastewater stream shall be discharged to the Sewage Collection network under any circumstances.
3. Each plant shall identify all wastewater streams originating due to its processes and activities and shall have access to the record indicating the analysis on quality and quantity.
4. The wastewater streams, except sewage, which are not required to be treated in Unit-23, Unit 45 & Unit-46, shall be discharged to the Discharge Pit (T-45260) of the Unit-45, to form a single discharge point for all wastewater streams, for effective monitoring of legal compliance. If this is not practical, then the HSSE Dept. shall be consulted to finalize the discharge point.
5. Any wastewater stream, which is not required to be treated in Unit-23, Unit 45 & Unit-46, shall be monitored to check compliance with the environmental legislation. The concerned plant shall ensure that such streams are included in the Monitoring Program issued by Environment Department. If the stream is not within the required limits, then appropriate treatment facility must be provided by the concerned plant. However, the wastewater streams that go to Unit-23, Unit 45 or Unit-46 for treatment shall be monitored, by the QAPCO Laboratory, as per the operational requirement and the specifications of these units. It is the responsibility of the plant (which generates wastewater) to ensure that the wastewater quality is in accordance with the specifications of these units.
6. The pH of wastewater streams from Demineralization/ Water Treatment Plant shall be within the range of 6 to 9, as indicated in the Consent to Operate. The Utilities Plant shall ensure monitoring of such streams and maintain records of the pH and any other parameter, if applicable. These streams can be directly discharged to the Cooling Seawater Return line.
7. Diversion of plant washings to the surrounding sand shall be avoided as far as possible. For

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the existing plants, appropriate modifications shall be considered/ initiated by the concerned Sections, whenever feasible, to meet this requirement.

8. The treated wastewater shall be recycled & reused within the plant or for growing green belt in the plant premises, to the extent possible, whenever feasible.
9. Non-routine liquid wastes, including the wastewater from the Equipment cleaning at Maintenance Cleaning Yard shall not be drained to the QAPCO's wastewater collection system or sent to the Unit-23. Any such disposal shall be after the clearance from the Process Section, SED and the Ethylene Plant.

6.4. Waste Handling and Disposal:

1. If a waste is generated due to any job or activity, then the executor of the job shall ensure that the work area is cleaned, and the waste generated is collected and disposed appropriately.
2. It is the responsibility of the concerned Supervisor/ or his substitute in-charge of job execution, to coordinate with the I&GS Department, for collection/internal transfer/disposal of wastes, if required.
3. QAPCO Waste Management Procedure (PR-PSS-123) shall be followed for collection, transfer, storage, segregation and disposal of various types of wastes.
4. All sections shall ensure that wastes are collected and stored suitably at appropriate locations. Accumulation of wastes for long periods is not allowed.
5. It is prohibited to dispose solid and semisolid wastes in any Wastewater Collection network / system of QAPCO.


6.5. Soil Contamination:

1. Any activity, process or design, which can cause Soil Contamination, is prohibited, until appropriate control measures are provided to prevent Soil Contamination.
2. The areas, where oil or chemical spills may occur, shall have adequate facilities to contain these spills, to prevent any soil contamination.
3. It is the responsibility of the concerned area in-charge to review all activities and areas having the potential of oil or chemical spills; and provide the necessary measures to protect the soil and groundwater resources from being contaminated by any spill.
4. In case of accidental spillage / leakage, the concerned Supervisor / or his substitute in-charge of work shall take all practical steps to contain the spillage, clean the contaminated area, take the remedial measures immediately and inform the HSSE Dept.
5. Overflow of wastewater collection pits, leading to soil contamination, is unacceptable. It is the responsibility of each plant/section to review the potential of overflowing of wastewater collection pits and to ensure that proper control mechanisms / procedures are in place to prevent any overflow. The backup arrangements, in case of such failures, should also be ensured by each plant/section.

6.6. Oil Handling and Used Oil disposal

1. **Used Oil Disposal:** All the concerned Plants collect the waste / used oil from their plants in closed drums and issue Waste Transfer Request for the same to be shifted to Waste Storage Yard. The waste / used oil in the WSY will be disposed through waste oil recycling

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companies. This is applicable to only the used oil collected in drums or in the Oil Tanker, and not to the used oil that is pumped directly to the U-23 Incinerator.

2. **Oil spillage during Lubrication of Equipment:** All the necessary precautions shall be taken by the concerned persons to avoid oil spillages during Lubrication of Equipment. Any oil spill during oil change /makeup shall be immediately cleaned to avoid soil contaminations. Procedure for Greasing & Lubrication of Equipment in QAPCO shall be followed on this matter.


6.7. Environmental Reporting:

1. QAPCO is legally bound to inform the MME about the following incidents:
 - a) Process upsets resulting in abnormal emissions : **within 3 working days.**
 - b) Oil and Chemical leakage / spillage : **within 3 working days.**
 - c) Unplanned process Start-up/Shut down activities: **within 3 working days.**
 - d) Planned process Start-up and Shut down activities: **3 days in advance.**
(Start-up/Shut down which may lead to any abnormal release)
2. To ensure timely communication of environmental release information to MME, QAPCO has established a SharePoint system at the following link
<http://intranet.pcl.corp.local/Envreleaseintimation/SitePages/Home.aspx>
3. In the event of any release, to meet the requirement of above **Clause1**, the concerned Plant / Dept. section shall initiate the process by filling the *Environmental Release Incident Notification (ERIN) Form* through the SharePoint Reporting System, preferably the same day, but not later than **24 Hrs** from the incident.
4. After approval from the concerned plant manager, the ERIN Form is received by SED through the SharePoint System. SED will review the matter, and if necessary, generate the *Environmental Incident Release Notification* to be sent to MME after approval from the CHSSEO, or his designate. This shall be done within 8 working hours.
5. If the Env. Release would result from a planned event or if it is going to continue for some time, or if full information is not available, then the ERIN will be issued as **Initial Notification**. In the event of *Initial ERIN*, the *Dept. Concerned* shall issue the *Final ERIN*, within one week after the end of release, with all the required information. The *Final ERIN* will have the same Reference Number but a different *Revision Number*.
6. For each Initial ERINs, a *Final ERIN* will have to be issued by the Concerned Depts.
7. SED will review the Final ERINs, and inform the MME if necessary, within three working days.
8. The record of all issued ERINs shall be maintained through SharePoint System.

6.8. Introduction of New Chemicals

1. Before ordering or using any new chemical in QAPCO, the user shall take specific approval from the HSSE Dept, either separately or by following the modification procedure. HSSE Dept shall review the new chemical from the following angles and revert back to the user accordingly.

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- a) Environmental Risk involved.
- b) Safety risks involved.
- c) Training of personnel, if necessary.

6.9. Disposal of Expired or Used Chemicals / Materials & Off-Spec Product:

1. The following sequence will be followed for disposal of expired or used Chemicals / Materials and Off-Spec Product:
 - a) Sell the material, if buyers exist.
 - b) Send it back to the supplier, for recycling/disposal, if feasible.
 - c) Use appropriate treatment / disposal method for safe disposal.
2. To achieve the above clause 6.9.1-b, the **Materials Department** shall include the following, or similar condition, in their *Purchase Orders*, wherever possible:

The following categories of materials shall be sent back to the supplier, for environmentally safe disposal or recycling, as and when required by QAPCO. It will be the responsibility of the supplier to ensure that these materials are handled and disposed off in accordance with the local and international environmental rules and regulations.

 - Unused or expired chemicals & used or spent substances that need periodic replacements, like catalysts etc.
 - Radioactive, dangerous or toxic materials.

6.10. House Keeping:

All employees shall maintain high standard of housekeeping at all times in QAPCO. The head of sections and department managers shall ensure that suitable work instructions / guidelines are in place to cover this requirement.


6.11. Environmental Guidelines for CONTRACTORS in QAPCO

Contractor's *Site In-charge* at QAPCO's premises shall be responsible for implementation of this instruction and other applicable Environmental Procedures and Instructions, and for coordinating and reporting to QAPCO regarding environmental matters.

6.11.1. Waste Handling and Disposal:

- a) It is the responsibility of the contractor, working inside QAPCO's premises, to anticipate prior to starting the job, the type of wastes expected to be generated due to their activities and ensure the necessary arrangements are in place for collection and disposal.
- b) The contractors shall ensure that all wastes are collected and stored suitably at appropriate locations, with prior clearance from the concerned area in-charge.
- c) The wastes shall be disposed of at the earliest. Accumulation of wastes for long periods is not allowed.
- d) Dumping of wastes into QAPCO's *Solid Waste collection Skips* is not allowed, until approved by QAPCO.
- e) No liquid waste shall be drained in to the QAPCO's wastewater collection system

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or sent to the Unit-23 (Wastewater Treatment Plant), until approved by the Ethylene Plant. Analysis of the liquid wastes will have to be provided before seeking the disposal in the Unit-23. If the liquid waste is not acceptable to the Unit-23, then the above Point-1 will be applicable.

- f) For transportation of any waste, the contractors must follow the applicable local and international legislations and guidelines.
- g) The contractors must maintain high standard of housekeeping always.
- h) The contractor shall ensure that all the environmental emissions related to its activities and services inside QAPCO, are meeting the requirements of the Environmental Protection Regulations of Qatar.
- i) The contractors shall maintain the records of their waste collection and disposal, and their environmental emissions and discharges. These records shall be accessible to QAPCO personnel as and when required.
- j) Asbestos based wastes, like gaskets, shall be put in plastic bags and shall be labeled. The asbestos wastes shall be segregated and handed over to the concerned QAPCO representative, for safe disposal as per the local regulations.

6.11.2. Pollution Prevention:

- a) All the necessary precaution must be taken to prevent any solid/liquid spillage. In case of accidental spillage, take all practical steps to contain the spillage and to clean the contaminated area immediately. Please refer to 6.11.3 for reporting.
- b) For the activities which result in emissions of dust and aerosols, like sand blasting, spray paintings etc., the necessary arrangements should be made to contain the pollutants to prevent air pollution in the surrounding areas.
- c) The list of banned substances is attached as to Annex-1. These substances shall not be used in any form, in any process, activity, equipment or material, until approved by QAPCO.
- d) Use of Asbestos based material is prohibited, until it is proved that any other alternative is not available. Use of Asbestos based material shall be reported to the HSSE Department, prior to commencing the assignment.
- e) Use of radioactive material-based equipment is prohibited until approved by QAPCO. The Contractors must take approval from the concerned area in charge before using any such equipment.


6.11.3. Environmental Reporting:

The contractors shall immediately report to the concerned area in-charge, any accidental **spillage** or other **incident** that has resulted in an environmental release (solid, liquid or gas). Records of such incidents shall be maintained by the contractors.

6.11.4. House Keeping:

The contractors must maintain high standard of housekeeping at all times in QAPCO.

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6.12. Environmental Guidelines for SUPPLIERS of QAPCO

- a) The list of banned substances is attached as to Annex-1. These substances shall not be used in any form, in any process, activity, equipment or material.
- b) Use of Asbestos based material is prohibited, until it is proved that any other alternative is not available.
- c) Use of radioactive material-based equipment is prohibited until approved by QAPCO.
- d) The following categories of materials shall be sent back to the supplier, for environmentally safe disposal or recycling, with prior agreement with the supplier. It will be the responsibility of the supplier to ensure that these materials are handled and disposed of in accordance with the local and international environmental rules and regulations.
 - i) Unused or expired chemicals & used or spent substances that need periodic replacements, like catalysts etc.
 - ii) Radioactive, dangerous or toxic materials.

7.0 RECORDS

The owner / executor of an activity under the scope of this document shall be responsible for maintaining all related records as required.

8.0 ANNEXES:

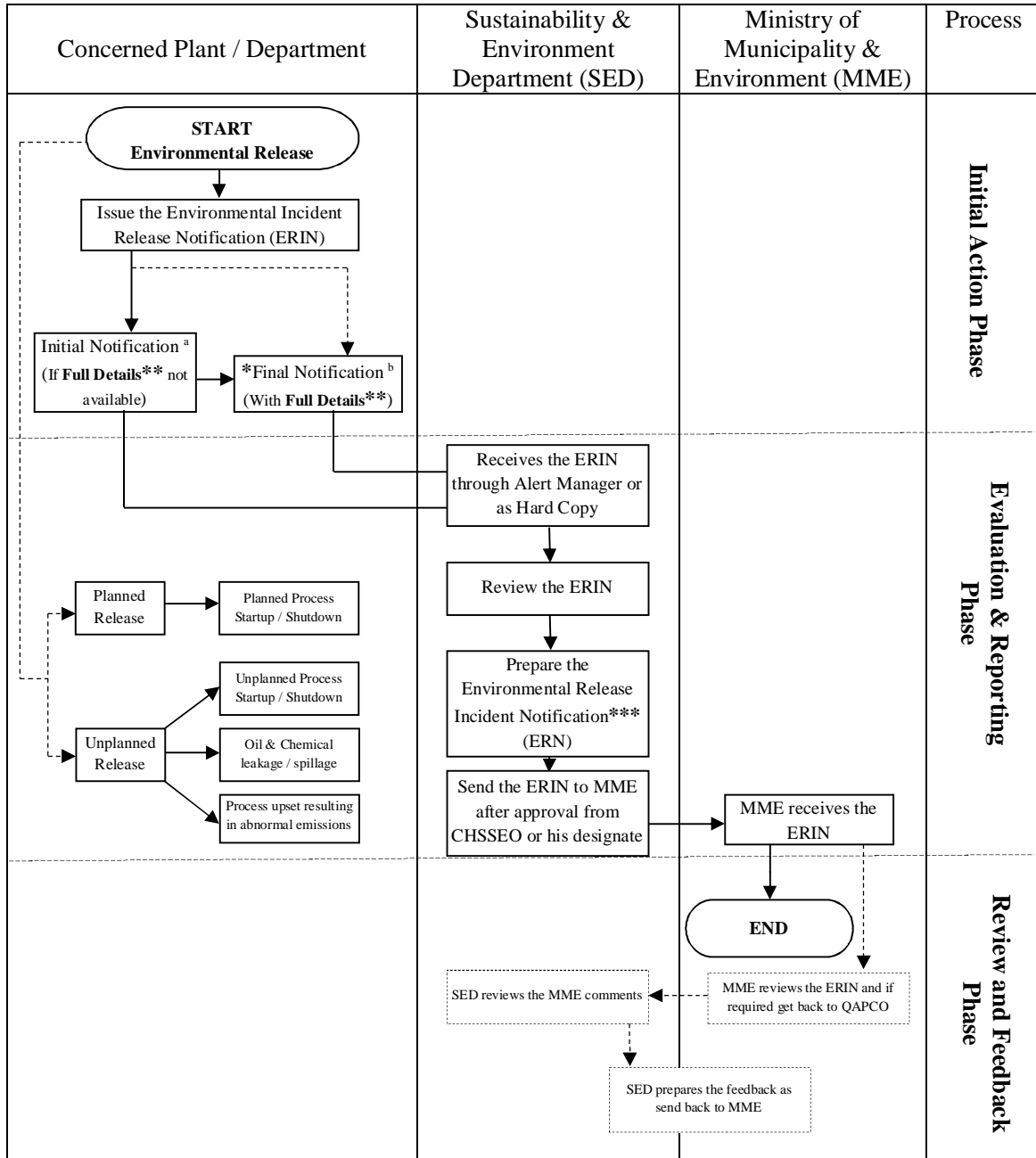
Annex – 1:Environmental Release Reporting Process Flow Diagram

Annex – 2:List of Banned Substances.

Annex – 3:Qatar Ratified Treaties

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Annex 1 ENVIRONMENTAL RELEASE REPORTING PROCESS FLOW DIAGRAM



* Same Ref. No. of Initial Notification, but different Rev. No.


** Full Details – Analysis Report, Actual Quantity discharged / released, Actual Duration of release

*** Initial ERIN form to be issued within 8 hours of receiving Initial ERIN. Final ERIN form to be issued within 3 working days after receiving Final ERIN

a – To be issued within 24 hours of Unplanned Release / 3 days in advance for Planned Release

b – To be issued within 24 hours of Unplanned Release / 3 days in advance for Planned Release if full details available or else within 1 week after the end of release for which Initial Notification has been issued earlier.

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Annex 2


LIST OF BANNED SUBSTANCES

The following substances are not permitted to be used in any process, activity, equipment or material, in any form. For exemption from this requirement, under unavoidable circumstances, please contact the *SED* of QAPCO, which will try to seek the approval from the *Supreme Council* for the same.

1. Aldrin
2. Chlordane
3. DDT
4. Dieldrin
5. Endrin
6. Heptachlor
7. Hexachlorobenzene (HCB)
8. Mirex
9. Toxaphene
10. Polychlorinatedbiphenyls (PCBs)
11. Dioxins
12. Furans
13. Lindane (HCH)
14. Polycyclic Aromatic Hydrocarbobs (PAHs)
15. Endosulfan
16. Atrazene
17. Pentachlorophenol (PCP)
18. Org-Hg Compounds
19. Org-Tin Compounds
20. Org-Pb Compounds
21. Phthalates
22. Asbestos
23. All other substances banned by the **International Treaties** like *Ozone Depleting Substances*, or by the **US-EPA**.

Note: The above list is for information only. For any specific use the latest updated list should be obtained from the MME.

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Annex 3 QATAR RATIFIED TREATIES

1. International convention for the prevention of pollution of the sea by oil, London, 1954 and its amendments 1/5/1980.
2. Agreement for the establishment of a commission for controlling the desert Locust in the near East Rome, 1965. 13/12/1968.
3. Treaty on the prohibition of the emplacement of nuclear weapons and other weapons of mass destruction on the seabed and the ocean floor and in the subsoil therefore, London, 1971, 12/11/1974.
4. Convention on the prohibition of the development production and stockpiling of bacteriological and toxin weapons, London 1972.
5. Convention concerning the protection of the world cultural and natural heritage, Paris, 1972. 12/9/1984.
6. Kuwait Regional Convention for cooperation on the protection of the marine environment from pollution, Kuwait 1978.
7. Protocol concerning regional cooperation in combating pollution by oil and other harmful substances in cases of emergency Kuwait 1978. 1/7/1979.
8. Protocol concerning marine pollution resulting from exploration and Exploration of the continental shelf, Kuwait 1989. 17/2/1990.
9. Intonation convention relating to intervention on the high sea in cases of oil pollution casualties, Brussels, 1969. 13/8/1988.
10. International convention on civil liability for oil pollution damage, Brussels, 1969 and the protocol of 1976, 31/8/1988.
11. International convention on the establishment of an international fund for oil pollution damage, Brussels, 1971 and the 1976 Protocol 31/8/1988.
12. Protocol for the protection of the marine environment against pollution from land-based sources, 21/2/1990.
13. Basel Convention on the control of transboundary movements of hazardous wastes and the disposal, Basel 1989. 9/8/1995.
14. Montreal protocol substances that deplete the ozone layer, Montreal, 1987. 22/1/1996.
15. Vienna convention for the protection of the ozone layer, Vienna, 1985-1996.
16. Continental convention on climate change. 1996.
17. Protocol on the control of marine transboundary movements and disposal of hazardous wastes and other wastes. Tehran 1998.
18. International convention for combating desertification, Bonn 1999.
19. International convention on biodiversity, Montreal/Canada. 1996.

Note: The above list is for information only. For any specific use the latest updated list should be obtained from the MME.

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