Areclieoch Windfarm Extension
EIA Report Technical Appendix 3.1: Outline Construction Environmental Management Plan
June 2019
The purpose of this document is to supplement information within the Environmental Stated Sheet (ESS), demonstrating the integration between the ESS, site activities, and the planning criteria associated with any consent. A Construction Environmental Management Plan (CEMP) sets out the controls and processes that are to be adopted to mitigate environmental impacts throughout a project. CEMPs are generally iterative and develop throughout the construction programme.

For SPR Western developments, the preparation of a CEMP is the responsibility of the appointed Principal Contractor (the Principal Contractor is generally the "Infrastructure Contractor" who is responsible for the balance of plant). SPR have certain environmental management standards that require to be considered for inclusion in CEMPs at all construction sites.

This document outlines, at a high level, SPR’s minimum requirements for CEMPs and provides guidance on the content. The document is based on SPR’s Environmental Management System (EMS) requirements, Industry Best Practice and relevant legislation at the time of preparation. This document has been prepared on an approval to the Environmental Statement.

It must be noted that this document sets out SPR minimum requirements for inclusion within a CEMP and sets out guidance and best practice for adoption at SPR construction sites. The Principal Contractor is likely to have their own management system requirements and CEMP templates. Therefore, the final site CEMP may vary from what is set out within this document. Site specific sensitivities and requirements of any planning consent, along with updates to legal requirements and construction best practice will also require to be considered in the development of the site CEMP.

Scope

- Onshore Windfarm Sites

Responsibility

NA
INSTRUCTIONS

1. Typical Contents for a CEMP

Typical Contents for the proposed CEMP are set out in the template below. Optional contents for the sections are set out within this Document in Sections 2 to 11.

2. Responsibilities for Environmental Management

Environmental Management responsibilities for the site require to be documented. This section shall set out the responsibilities for the site, including identification of key site staff and their environmental management responsibilities and how this links with "Chain of Command" responsibilities and that of the project team such as the Environmental Manager and environmental advisor and environmental specialists such as Ecological Clerk of Works and Archaeologists. Interactions with stakeholders such as the Local Authority, Scottish Natural Heritage, Natural England, Scottish Environment Protection Agency, Environment Agency, etc. should also be covered in this section.

On the majority of construction sites SPR employs a Principal Contractor who is responsible for environmental management of the site, including the preparation of onsite environmental documentation.

3. Associated Documentation

This section shall refer to relevant associated EMS and site specific documentation that require to be taken into consideration in developing the CEMP. Examples include Client requirements (such as SPR Environmental Policy), Contaminated Land requirements, site Environmental Statement, planning conditions, consents, risk registers, legal registers, etc.
4. Site Description and Associated Environmental Sensitivities

This section shall set out information on the location of the site, its environmental aspects, impacts, risks and opportunities. SPR have an audited, assessed risk register as part of the ISO14001 Environmental Management System. This identifies potential environmental impacts for construction projects and relevant control measures.

The Principal Contractor will be expected to have their own assessed, audited, risk register as part of the Environmental Management System.

5. Environmental Management

Sustainable Development should be integrated throughout the construction stage. This can bring benefits from an environmental perspective, but also economic and social considerations such as site planning, material selection, resource and energy use, and waste management. This section therefore sets out the details of the controls and procedures to be adopted to mitigate the environmental impacts on site and any opportunities or initiatives should be explored at a site level.

Typically this would cover the following areas:
- Surface Water Management
- Oil and Chemicals Storage and usage
- Waste Water and Water supply monitoring and control
- Waste and Resource Management
- Traffic and Transport
- Air, Noise & Vibration, Land Management and Archaeology, Flora and Fauna
- Environmental Incident Response
- Wasted Substances and Risk Assessments

A brief overview of some of the key issues is provided below, however it must be noted that these are not exhaustive and will be developed for the specific site.

5.1 Surface Water Management

This section of the CEMP shall detail practices related to the protection, control, and movement of surface water. SPRs or Principal Contractor shall be required to prepare detailed site surface water management design and drainage plans for the site. The designs shall detail the surface water management measures to be implemented during the works. The detailed design shall be supported by calculations and documents for sizing of the proposed measures, including infiltration, detention, conveyance and drainage detailing, catchment areas, site sensitivities and guidance for implementation. Where appropriate the principles of Sustainable Urban Drainage Systems shall be applied. Design information will require to cover both temporary and permanent drainage measures on site.
It is important that silt fences and drainage ditches are implemented in advance of the main construction activities and are designed to ensure that, as far as possible, clean water is not contaminated by dirty water.

Silt Fences - are designed in order to effectively filter the water, holding back the silt and allowing the water through. They require to be installed correctly with the lowest part of the fence dug into the ground.

Silt fences may also require to be cleaned out on a regular basis, particularly after periods of heavy rainfall. Silt fences require to be upgraded and maintained on a regular basis in order to ensure that silt water is not running under or past the silt fences.

Silt Backs - can be put in place where the roads encroach cross over watercourses and ditches. Generally, all flume is installed in order to prevent silt runoff from the roads entering directly into watercourses. These require to be improved and maintained in order to ensure that silt runoff does not enter directly into the surface watercourses below.

Settlement Lagoons - control surface water run-off by slowing the flow of water and allowing the silt particles to drop out of suspension, before the water is discharged. Lagoons must be sized appropriately by consideration the anticipated volume and quality of run off they will be receiving. A number of lagoons in series and/or in parallel may be required to provide adequate settlement time. Lagoons require to be maintained regularly, dredged out on a regular basis, in order to ensure peak performance. A series of lagoons may be required to provide adequate settlement.

It is important that settlement lagoons are constructed prior to works likely to generate silt run off in order to prevent silt run off to ensure that all potential silt is captured.

Flocculants - are also used to aid settlement of fine particles. These involve a chemical solution that can be used to cause very fine particles to stick together and settle out of the water. The point of treatment shall be constructed in such a way to allow controlled dosing and a documented regime shall be kept to record use of chemicals at each location of treatment. A treatment area must be provided after the point of treatment to give the flocculants a chance to work and the particles to settle out.

The use of Flocculants will require approval from the regulator, and should be reviewed for any facilities are equipped with conventional treatment methods, and/or very fine sediment particles (e.g., clay) being encountered. All surface water management measures outlined above to be maintained by the Principal Contractor. It is important that maintenance is undertaken in order to ensure that lagoons and silt fences are de-mounted when required as the retention capacity of the system will be affected by a build-up of sediment.

All mitigation measures implemented on site will require to be visually monitored on a regular basis. This may be weekly or as a minimum frequency related to risk, site sensitivity, weather conditions, etc., with inspections of mitigation measures also being carried out after periods of heavy rainfall. Inspections of mitigation measures and any required maintenance will be carried out by the Principal Contractor. A record of any findings from these inspections carried out by the Principal Contractor will be recorded and maintained where it is necessary to maintain records of any silt water runoff entering watercourses or any maintenance required to mitigation mechanisms, e.g., the de-mounding of silt fences or lagoons.

5.2 Oil and Chemical delivery and storage

Oils and chemicals should only be stored in manageable quantities and stored responsibly i.e., in a bunded area or suitable containment area. In accordance with relevant legislation and containers must be labelled with details of contents.

Oil and chemical storage

All fuel tanks should be locked when not in use. All oils and chemicals should be returned to the storage area after use.

Fuel oil shall be delivered to site by road tanker and transferred to mobile storage vessels and to the static tank(s) within a designated fuel transfer area (retention area) in the site compound and/or designated refueling areas on site for mobile vessels. Any fuel storage or static tanks on site will require to be buried to 110% capacity.

It is a Scottish Power Renewables requirement that storage of static generating(s) and associated fuel tank(s), which are separate with interconnecting hoses, have to be located within a covered impervious bund - where these will be located on site for the “duration of the works” e.g., at construction compounds. This follows best practice as set out in PPG 6, Bunds shall be constructed from concrete, brick, stone or similar (e.g., a walled containment facility). Pristine rainwater from accumulating in bunds as this compromises the containment, if required, drainage of these areas shall be via an Oil Separator.

Where this arrangement is for a short duration such as 6 months or less e.g., at the construction of a control building, alternative containment options can be considered, subject to site specific factors and duration e.g., such as containment of interconnecting hoses using a plant happy and agreement with Scottish Power Renewables.

Where more than one containment is stored, the storage bunds should be capable of storing at least 110% of the largest container or at least 25% of the total storage capacity, whichever is greater. An efficient spill response kit should be immediately to hand and be used to mop up any spillage. The following are general spillage requirements for oils and chemicals:

- All storage containers should be clearly labeled in accordance with Control of Substances Hazardous to Health (COSHH) requirements or appropriate replacement legislation. All containers should be stored in an upright position.
- The Site should maintain a COSHH Inventory.
- Storage of oils and chemicals should be (such as separators) to prevent a separation between the different types of storage is required, location should be kept at least 10% away from watercourses. Possible places to watercourses and drains and should consider site sensitivities and the scope of activities being undertaken. Storage areas should be located in areas free from vehicle movements to minimize the risk of pollution damage.
- The controller should also consider the installation of oil interceptors within compound drainage where a significant volume of fuel and oil is stored.

Replenish
Reefilling activities onsite should be undertaken by a designated and trained member of staff. Reefilling should only be carried out in designated reefilling areas. These areas should be located away from waste containment and drainage systems and should consider site sensitivities and the scope of activities being undertaken. Dip trays should be used and spill kits should be located at all reefilling locations, which will also require to be marked on the site plan.

Used spillage response kit material and waste oil should be treated as hazardous special waste and stored appropriately on site. All waste will require to be disposed of off-site to a licensed disposal site.

**Inspection and Maintenance**

Oil and chemical storage areas should be inspected, at least weekly for signs of spillage, leaks, and damage. Rainwater, materials, and general debris in bunds and dip trays should be removed as part of the maintenance programme.

**Disposal of Oils and Chemicals**

Details for the disposal of oils and chemicals should be set out in the waste management section of the CEMP.

### 5.3 Wastewater and Water supply monitoring and control

Wastewater presents a hazard to the environment and can cause contamination of groundwater and pollution of surface waters.

In order to manage wastewater and water supply facilities at construction sites, a series of monitoring and maintenance control measures should be put in place.

**Wastewater Monitoring and Control**

Wastewater facilities on a construction site often comprise septic tanks, cesspits or holding tanks; all of which will require to be emptied by a licensed waste carrier. Frequency for the emptying of wastewater facilities and associated responsibilities will be assigned by the Principal Contractor. The frequency of emptying will depend on the volume of the associated tank and number of personnel occupying the site.

In the case of a septic tank, regular sampling will be required from the discharge point to demonstrate compliance to any quantitative limits set in the discharge consent. Authorization or permit issued by the Scottish Environment Protection Agency (SEPA) or Environment Agency (EA), Natural Resource Wales and Northern Ireland Environment Agency (NIEA).

The sample will require to be analysed for parameters specified in the discharge consent, authorization or permit. If no parameters are specified it is recommended that the sample should be analysed for suspended solids in order to ensure that the discharge is not causing undue environmental impact to the receiving water environment.

Sampling, screening, and recording of sample results on construction sites are the responsibility of the Principal Contractor.

Quality of the discharge from septic tank facilities on construction sites should be visually checked by the Principal Contractor on a periodic basis as part of their environmental site inspections.

Concrete washout areas should be planned to ensure that they do not cause congestion with site traffic and designed to prevent the escape of run-off into the natural environment of the site such as a lined containment system. When washout areas are full and the contents have hardened it should be broken up and disposed of in an appropriate manner. Washout areas should be clearly identified at specified locations.

**Water Supply**

Windfarm construction sites usually have a connection to a mains water supply with drinking water being supplied via drinking water coaters and tap and kitchen facilities being supplied via rainwater harvesting via holding tanks on the roof of the construction compound or via tanked water.

In some cases the connection compound can also be supplied by water from an abstraction point, via a borehole water supply, for example, or water may require to be abstracted for other site activities such as on-site waste batching plans.

The Principal Contractor will be responsible for monitoring and recording the location of abstraction activities on site and associated abstraction rates during the construction phase to demonstrate compliance to any abstraction licences/permits.

### 5.4 Waste and Resource Management

**Waste Hierarchy**

SPR aims to manage waste in accordance with the waste hierarchy by avoiding waste generation and promoting waste minimisation in the first instance. This applies to both our construction and operational sites. Where waste is produced, we will aim to reuse, recycle, or recover waste through practical and economically feasible prior to considering disposal. We support the Circular Economy and encourage contractors to also adopt this approach where practical when considering the management of materials.

SPR together with our Suppliers and Sub-contractors who generate or dispose of waste as a result of carrying out their agreed activities require to do so in a controlled manner and in line with current legislation.

**Types of Waste**

Waste produced on site will generally be regarded as 'controlled waste', which comprises household, commercial or industrial waste. Waste produced by construction sites will usually be regarded as commercial waste since it will have been produced from premises used wholly or mainly for trade or business purposes.

Some controlled wastes are often further classified in view of their difficult nature and additional regulatory controls. In general terms and for most practical purposes it is often easiest to consider wastes as either hazardous or non-hazardous.

General waste arising at site such as waste paper, plastics, wood, metal, packaging, small quantities of waste food and food containers and septic tank waste are unlikely to fall in the non-hazardous category.

Hazardous wastes produced on site will include oils and fuels, oily rags, solvents, chemicals, and electrical equipment. Associated materials used for containing/dispensing spills of substances will be disposed as hazardous waste e.g., absorbent mats. The materials should be bagged, sealed and
лади и placed in a hazardous waste storage container in the same way, as any other waste
contaminated with a hazardous substance must be treated, and disposed of, as hazardous waste.

Storage of Waste
Waste should be deposited and contained within suitable labelled storage facilities until its removal from
site by an authorised waste carrier. Waste should be segregated as appropriate for recycling such as
paper, cans, plastics, wood, metal, packaging.
Labelling on containers must be durable and permanent. When decommissioning storage locations,
consideration should be made to enable adequate and access for plant and manual handling.

Transfer of Waste
Only authorised waste carriers should be employed to remove waste from Construction Sites. The
Principal Contractor will be responsible to ensure that carriers have the required documentation such as
Waste carriers licences.

A Waste Transfer Note must accompany and be raised before transfer of any non-hazardous waste off
site.

All wastes that are classified as special or hazardous waste are subject to the Consignment Note
system for transfers.

Copies of the above documentation shall require to be retained on-site in line with applicable legal
requirements.

Waste Management Plan (WMP)
SPR construction sites shall require a Site Waste Management Plan, which will be the
responsibility of the Principal Contractor. The Plan should record the following information, as a
minimum:

• The types of waste generated by the site,
• The management approach for each waste type (Reuse, Recycle, Recover, Dispose),
• The storage arrangements for each waste type;
• Details of Waste Management companies to be used to deal with waste from the project
• The site waste monitoring and operating arrangements.

5.5 Air, Noise, Vibration, Land and Flora and Fauna

Emissions to Air
During construction in dry weather there is the potential for a certain amount of dust to be generated.
Some of the measures implemented on site may include, but will not be limited to the following:

• Adherence to the speed limit on site in order to reduce the dust generated from transport on site;
• Water bowser spraying with water to dampen dust down;
• Road sweeping - remove dirt from the road surface to reduce the potential for dust on the public
road, if required;
• Materials with the potential to produce dust shall be stored accordingly to prevent dust generation
eg, materials stored out of the wind and covered;

Transport of dust generating material shall be covered.

Noise and Vibration
There is the potential for noise and vibrations to be generated during the construction process.
Measures will require to be implemented on site to minimise any effects and a programme of monitoring
may be required.

Plants and Fauna

Monitoring of flora and fauna should be undertaken as part of the daily/weekly site inspections carried
out by the on-site Ecologist (Effective Clerk of Works (ECOW)) or Environmental Pk Manager. All details from
the inspections should be recorded in the form of a monthly report; the report should be signed by ECOW
and the Principal Contractor. With findings of the report being discussed at the monthly health, safety
and environmental meetings.

Depending on the location of the site Consultancies or Licences may also be required in relation to Protected
Species and Habitats.

Land Management Plan

On sites that will involve the excavations of peat, the Principal Contractor shall prepare a Peat
Management Plan. The Plan will take consideration of appropriate guidance, good practice and satisfy
the requirements of the regulator.

5.6 Emergency Environmental Spill Response

Responsible construction and the management of health, safety and environmental risks are paramount
to the prevention of environmental incidents. The CEMP will include an Emergency Environmental
Response Procedure, including a response flow chart.

As part of the environmental management elements on site it is a SPR requirement that the Principal
Contractor shall have in place a dedicated "environmental team". The purpose of this team is to carry
out environmental management works on site such as surface water management and to respond to
environmental incidents, such as spill response etc.

Note: The requirement to have an Ecologist on site will depend on the site sensitivity and
planning constraints/ requirements.
Control measures should be developed, implemented and monitored to ensure that any impact on the environment is minimised.

All persons involved in the work activities closely linked to a construction site should be given a method statement briefing, in the form of a tool box talk, delivered by the Principal Contractor. This should outline the risks involved and the control measures that personnel are expected to comply with. It is good practice that individuals require to sign a method statement briefing record sheet acknowledging receipt of the information.

5.6 Traffic and Transport

During the construction phase, there will be traffic movements within the site boundary in addition to associated traffic movements on the local road network such as heavy goods vehicles, turbine transporters. Measures to address associated impacts should be set out in the CEMP and may include a traffic management plan.

5.7 Method Statements and Risk Assessments

It is the responsibility of the Principal Contractor to have in place method statements and risk assessments for works being carried out onsite. Where relevant, the method statement should cross reference applicable environmental risk assessments. The risk assessments should identify the environmental impacts and outline associated control measures.

The following environmental risks are examples which could be identified on a construction site:

- Discharges to water (including accidental spillage);
- Releases to atmosphere (including dust);
- Discharges to land (including accidental spillage);
- Waste management (duty of care compliance); and
- Impact on ecological systems.

6. Monitoring

A programme of monitoring shall require to be set up for the site, which should be documented in the CEMP and include the following items where relevant:

- Surveys: Pre-construction and ongoing ecological surveys such as surveys for European Protected Species, bird surveys, protected habitats etc. as required.
- Site Inspections: The Principal Contractor or appointed delegate will require to undertake site inspections at least once a week (dependent on site activities). These inspections will require to include an environmental component which will cover the CEMP requirements set out on UKENGE-SPR0008 Guidance for Construction Site Environmental Inspections and as a minimum cover management; surface water management; management of hazardous materials; water and wastewater management; emergency response; incidents and complaints; emissions; and other site-specific issues.
- Weekly Inspections will be supplemented by a combination of polygraphy inspections, dependent on the site specific requirements.

SPR also carry out periodic site inspections to assess the performance of the various contractors on site. This is monitored on the form UKENGE-SPR0027 Construction Site Environment Inspection Form which covers the CEMP requirements set out above.

The Principal Contractor is responsible for ensuring the compliance with all the risk assessments identified during the inspections. Records of the inspections carried out are to be maintained by the Principal Contractor and any remedial actions required are also recorded.

Environmental Audits: Internal (Principal Contractor) and external (via the Inspector). The SPR EMS and associated audit programme includes the requirement to audit SPR construction sites on a periodic basis. This is in addition to the site inspections. An audit checklist is used to ensure that a standard approach is applied across all of our construction sites.

7. Legal Compliance and other requirements

All quality is carried out by trained personnel within the SPR environmental team (or designated specialists). All address raised from the site are logged within the EMS progress tracked and a closing date assigned when the actions complete.

Physical monitoring: A programme of physical monitoring may be established such as water quality, dust, noise, vibration, and energy and resource usage.
7.1 Planning Conditions

The Principal Contractor is required to ensure that all relevant planning conditions for the site are complied with.

In addition, the SPR project manager will be responsible for maintaining an up-to-date register of the planning conditions for the site that specifically relate to the construction phase of the project. The register will be reviewed by the SPR project manager on a periodic basis to ensure that all of the planning conditions are being complied with and progress against each planning condition will be logged in the register. A copy of the planning conditions will require to be held on site.

7.2 Legal Register

The Principal Contractor is required to ensure that all relevant environmental legislation and best practice are complied with on site.

In addition, it is SPR policy to minimise the impact of its construction activities on the environment by complying with all current environmental legislation and best practice. In order to ensure that SPR are aware of the requirements of current environmental legislation a Legal and Compliance Register is kept as part of the SPR EMS.

All contracts made including the Principal Contractor and the sub-contractor are required to comply with current (and future) environmental legislation, regulations, best practice, and standards applicable to the activities in which they are engaged and other environmental requirements decided upon by SPR. This includes maintaining sufficient records of environmental information and audits both to show compliance with legal requirements and to demonstrate continual improvement where appropriate.

The Principal Contractor will be responsible for the applicability and obtaining any related consent licences to their activities such as waste tank operators, water abstraction licences, activities associated with water crossings, environmental protected species licenses and other discharge consents or environmental permits.

SPR will assess compliance to relevant environmental legislation as part of the SPR construction site environmental audits and inspections.

8. Reference Material

Key reference material in this section of the CEMP should include the following.

- Site Planning Conditions
- Legal Register
- Consents and Permits

9. Training

Various mechanisms are employed at construction sites to communicate environmental management requirements. Key mechanisms are set out below.

9.1 Site Inductions

All SPR construction sites require to have a site induction that includes an environmental component. Designated on site personnel from the Principal Contractor’s project team will be responsible for preparing and delivering the site induction and maintaining documented attendance records. SPR have guidance on the environmental management contents of site inductions that includes the following items:

- Permits/licenses;
- Waste;
- Water and Wastewater;
- Fuel, Oil and Chemical Management;
- Spillage; and
- Environmental Incident Reporting and Environmental Emergency Response Management.

9.2 Tool Box Talks (TBT)

TBT are an effective method for the dissemination of information relating to work activities. Environmental TBTs will require to be delivered by the Principal Contractor to on site personnel on an as required basis. When a TBT has been delivered it is the responsibility of the Principal Contractor to ensure that all personnel attending the TBT have signed a TBT attendance sheet. Topics for environmental TBT may include:

- Waste Management
- Delivery and Storage of Oils and Chemicals
- Waste Water and Water Supply Monitoring
- Surface Water Management
- Emergency Response
- Ecological Sensitivities
- Split exposure training
9.3 Environmental Notice Board

It is an SPR requirement that all our construction sites have an environmental notice board. The notice board will be used to display copies of relevant environmental management information, including but not limited to the following:

- SPR Environmental Policy
- SPR Environmental Behaviours
- Relevant SPR Environmental Bulletins and Alerts
- Site Plan showing ecologically sensitive areas/management areas
- Emergency Response Contact Details
- Emergency Response Plan

10. Reporting

10.1 Environmental Incidents

The Principal Contractor will be required to prepare a site specific environmental emergency incident response plan. The plan will require to include how to report and deal with an environmental incident including the measures available to contain/stop an incident (e.g. spill kits).

It is the responsibility of the Principal Contractor to ensure that all staff, including any subcontractors are trained in the environmental emergency response plan so that they are prepared to respond to an incident promptly and effectively on site. Where appropriate, SPR encourage a list of the environmental emergency response plan to be certified by the Principal Contractor.

The Principal Contractor will be required to report environmental incidents to the SPR project team.

Details of the incident report require to be logged in the SPR reporting system by the relevant SPR project team member.

10.2 Public Complaints

The Principal Contractor will require to have in place a procedure for receiving and responding to public complaints. The Principal Contractor will be required to report public complaints to the SPR project team. Details of the complaint are required to be logged in the SPR reporting system by the relevant SPR project team member.

10.3 Meetings

Environmental meetings and debriefs will require to be held on site. This includes a standard monthly health, safety and environment meeting that is required to be held on all SPR construction sites. The meeting will require to be chaired by a member of the SPR project team and will generally include the Principal Contractor, PRP, principal supplier, key subcontractors and environmental specialists such as Ecological Clerk of Works.

Where deemed appropriate and on sites where an Ecological Clerk of Works is present, weekly ECoW meetings may be held between the ECoW and the Principal Contractor and any other appropriate parties. The purpose of these meetings is to discuss ongoing issues relating to the ECoWs, etc.

have been raised through the ECoW reports and to produce an action list to help prioritise the above out of the actions.

10.4 Community Liaison

Depending on the site location, a public community relations plan may be developed by the site by the Principal Contractor. The purpose of the plan is to set out the approach to community liaison for the duration of the Project, SPR would also contribute to the plan.

11. Contractor Management

The Site CEMP should set out how the Principal Contractor manages their subcontractor’s onsite. This may range from the selection and assessment processes to the management of performance on site.

In regards to SPR, SPR appoint third parties to construct our portfolio of offshore windfarms such as the Principal Contractor and to the supplier.

SPR have a preference for our construction sites to be delivered by our Principal Contractors under the Constructing Contractor Scheme. Sites and companies that register with the scheme are monitored against a Code of Conduct Practice that focuses on three main areas of concern: the general public, the workplace and the environment.

DOCUMENT CONSIDERED UNCONTROLLED WHEN PRINTED