Co-financed by the European Union
Connecting Europe Facility

Document title: **HAZARDOUS MATERIALS MANAGEMENT PLAN**

Document number: **1062-TGN-MNG-PLN-PJM-22-00004**

Project: **THE DEVELOPMENT OF THE ROMANIAN GAS TRANSMISSION SYSTEM ALONG BULGARIA-ROMANIA-HUNGARY-AUSTRIA ROUTE, PODISOR – GMS HORIA AND 3 NEW COMPRESSOR STATIONS (JUPA, BIBESTI AND PODISOR) (PHASE 1) (REFERENCE NUMBER IN EU LIST: 6.24.2)**

Revision	Date	Issued by	Checked by	Endorsed by	Approved by
Rev 2		Popovici Maria Lucia Head Environmental Protection Service SNTGN Transgaz SA	Iulian Butnaru BRUA HSE Project manager / Alexandru Simionescu BRUA Execution Project manager	Paul Popescu BRUA Project Manager PMU / Sorin Keszeg BRUA Project Manager services	Ion Sterian Director General SNTGN Transgaz SA

Table of Contents

Abbreviations

Abbreviations	Description
BRUA	Bulgarian-Romanian-Hungarian-Austrian
CESMP	Construction Environmental and Social Management Plan
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
F-CESMP	Project Framework Construction Environmental and Social Management Plan
HSE	Health, Safety and Environment
HSE-MS	Health, Safety and Environment Management System
HSES	Health, Safety, Environment System
HSSE	Health, Safety, Social and Environment
JOCE	Official Journal of European Community
KPI	Key Performance Indicators
PMU	Project Management Unit
PR	Performance Requirement

1 Introduction

1.1 Overview

The Construction Environmental and Social Management Plans (CESMP) defines the actions and measures necessary for the overall management of environment and social impacts for both the Project beneficiary (TRANSGAZ S.A., represented by the Bulgarian-Romanian-Hungarian-Austrian Project Management Unit (BRUA PMU)) and contractors in line with the applicable law and other obligations. The CESMPs are comprised of a suite of management plans.

This CESMP is the Project Hazardous Materials Management Plan, document no 1062-TGN-MNG-PLN-PJM-22-00004.

Hazardous materials are any materials that represent a risk to human health, property or the environment due to their physical or chemical characteristics. When a hazardous material is no longer usable for its intended purpose and is intended for disposal, it is considered a hazardous waste (and is addressed through the Waste Management CESMP 1062-TGN-MNG-PLN-PJM-22-00005). The Project seeks to proactively manage the handling and storage of hazardous materials, as well as the prevention of accidents and the control of releases of hazardous materials to ensure the protection of the workforce, the public, property and the environment.

1.2 Purpose of this Hazardous Materials CESMP

The purpose of this Plan is to ensure an adequate management of hazardous materials throughout the construction phase of the project to prevent any negative impacts on the people's health, property and on the environment. As such, this Plan:

- Outlines the key policies, legislation and standards relating to waste management;
- Defines roles and responsibilities;
- Outlines actions and measures necessary for the effective management of hazardous materials (including handling and storage) as well as accidental release of hazardous materials;
- ;
- Details specific control measures to be implemented by the Company and its contractors (and subcontractors);
- Incorporates the requirements of the Regulatory EIA findings, Supplemental Environmental Assessment (June 2017), international standards, Romanian legislation, Lenders requirements and Project-specific construction permits;
- Considers the Company's general approach to hazardous materials management procedures and methodologies.

The CESMP defines the actions and measures necessary for the management of hazardous materials by both the Project beneficiary (TRANSGAZ S.A., represented by BRUA PMU), Contractors and sub-contractors, in line with the applicable law and other obligations.

1.3 Scope of the Hazardous Materials CESMP

This CESMP covers all activities and is applicable to all Transgaz staff, Contractors and Sub-contractors. Whilst this CESMP will act as a 'framework' to determine what the Contractors will be expected to produce, Contractors are required to ensure that all the CESMP requirements are adopted within their own

management plans. Further information on Roles and Responsibilities is provided in Section 5 of this CESMP.

1.4 Document Management

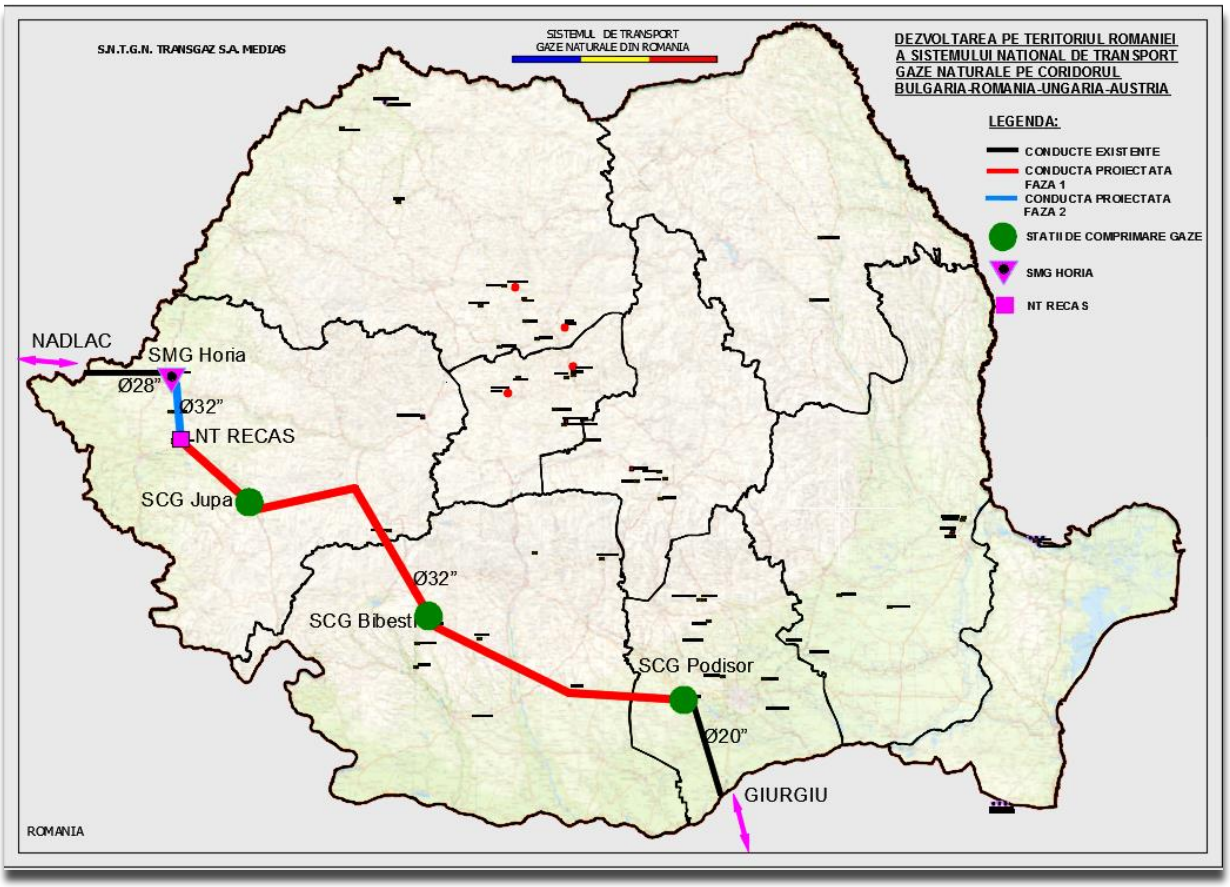
Document will be managed and controlled by the Document Control and Archiving Compartment within BRUA Project Management Unit. The methods for document management and improvement during the construction phase will be described in the Document Guide to be developed by BRUA PMU.

2 The BRUA Project

2.1 Project Overview

SNTGN Transgaz SA Medias ("Transgaz", "the Company" or "the Beneficiary"), the licensed operator of the Romanian National Gas Transmission System, is developing a 529km natural gas pipeline between Podisor in southern Romania and Horia in the west of the country (the "Project"). The pipeline, which for much of the route will be buried and will upgrade or run alongside existing pipelines, represents the Romanian section of the BRUA Natural Gas Transmission Corridor. In addition to the pipeline itself, the Project will also require construction of three new Gas Compressor Stations (GCS) at Podisor, Bibesti and Jupa, as well as a range of supporting infrastructure including block valve stations, construction camps, pipe storage areas, watercourses and infrastructure crossings and access roads.

Figure 2.1 BRUA Route



Whilst the majority of the route is on land currently used for farming, it does pass through a number of specifically sensitive areas, including seven Natura 2000 Sites, and the nationally important Dinosaurs Geo-Park. It also passes close to a number of sites of archaeological value including the ancient city of Tibiscum near Jupa. In some of these areas, as well as near major roads and railways and for the 8 major rivers, this will involve the use of horizontal directional drilling. In mountainous areas special "hammering techniques" may also be applied.

2.2 Environmental and Social Commitments

The Project is subject to various environmental and social requirements that are managed by the Company through the implementation of its Health, Safety and Environmental Management System (HSE-MS)[1]. This HSE-MS includes a specific Project Framework Construction Environmental and Social Management Plan (F-CESMP) as well as associated topic/activity specific CESMPs. Operational phase Environmental and Social Management Plans will be developed at a later stage prior to BRUA operation. The overall approach to integration of the above documents is described in Section 4.2 of the F-CESMP document.

2.3 Project Approach to Waste Management

The Project construction activities will result in the generation of hazardous materials that require proper planning from the outset to ensure a system of coordinated management between BRUA PMU, contractors

[1] Integrated Management Manual Quality-Environment-Occupational Health and Safety, code MSMI-CMSSO Ed. 03/Rev.

and local authorities (which have the competency to check compliance with Project provisions regarding the storage, transportation, and final disposal of hazardous materials), and also to sanction deviations from legal framework).

3 Key Policies, Legislation and Standards

3.1 Overview

The Project is subject to a range of policies, legal and regulatory requirements and other applicable standards of relevance to this CESMP. Where two or more of the identified standards are inconsistent or contradictory, unless otherwise justified, the Project will adopt the most stringent.

3.2 Company Policies

Transgaz' *Health Safety and Environment (HSE) policy* (as outlined in the Integrated Management Manual Quality-Environment-Occupational Health and Safety, code MSMI-CMSSO Ed. 03/Rev.) and *Corporate Social Responsibility policy* apply to all activities carried out by, or on behalf of, the Company as part of this Project. Details of these policies are provided in Section 7.3 of the F-CESMP.

3.3 National Legislation and Permits

All contractors are also required to comply with all relevant national regulatory requirements. Whilst contractors are required to verify the latest regulatory requirements themselves, an indicative list of Romanian national legislation is provided in Appendix 3.

Contractors must also ensure that relevant requirements of the various construction-related permits for the Project issued by national (and local) regulators are addressed. Any requirements arising from the revision/amendment of those permits will also be applied. Key permits are summarized in Section 3.2 of the F-CESMP.

3.4 International Standards and commitments

A range of international standards and commitments are applicable to this CESMP as described in Section 3.3 of the F-CESMP Document. These include the European Bank of Reconstruction and Development (EBRD) Environmental and Social Performance Requirements (PRs), with PR3 being especially relevant to this document. All contractors are required to comply with all such requirements as they apply to their activities.

The following European Union Regulations are relevant to this CESMP and have been taken into account:

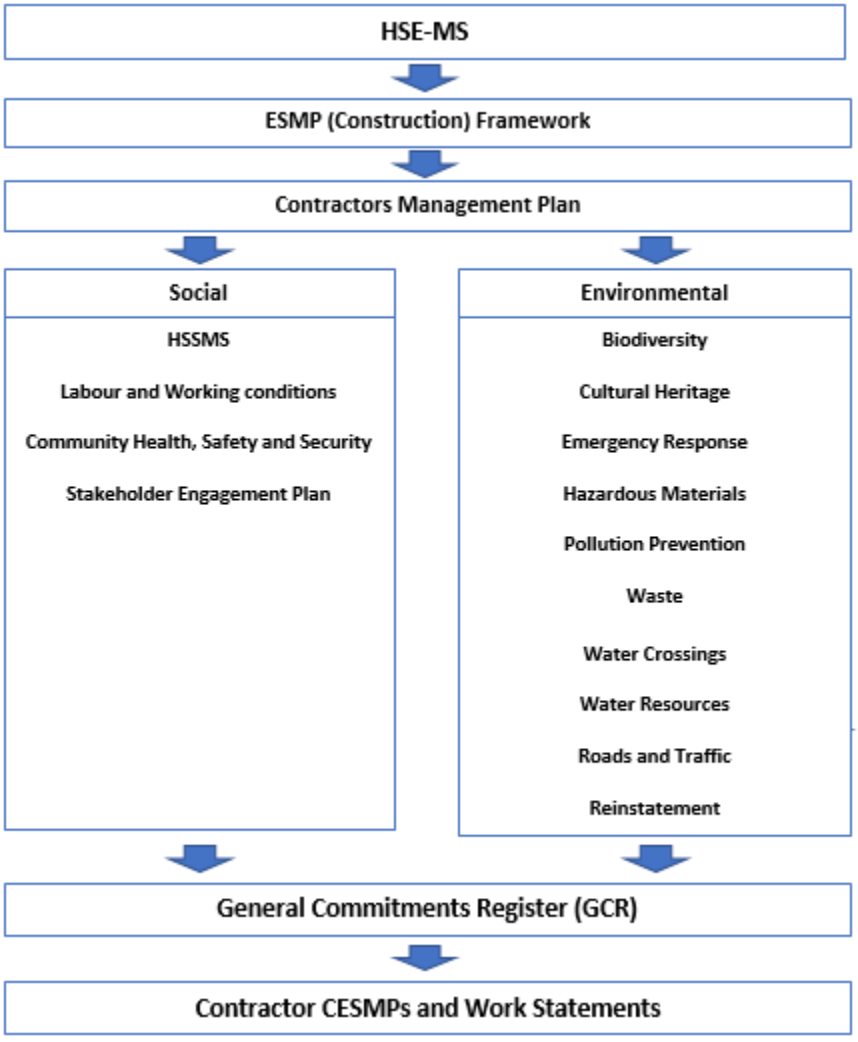
- Waste Framework Directive 2008/98/EC
- Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006
- Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

4 Linkages to other Elements of the Transgaz HSE-MS

4.1 Overview

This CESMPs forms part of the Project HSE-MS as described in the F-CESMP. Where relevant the CESMP should be read in conjunction with other HSE-MS elements including the ESMP source documentation, control documentation and the key HSE-MS documentation. These are illustrated in Figure 4.1 below and further described in Section 4.1 of the F-CESMP.

Figure 4.1 Links to other HSE-MS Documentation



4.2 Linkages to Other CESMPs

A listing of the CESMPs and their document numbers is presented in Section 4.2 of the F-CESMP Document. The other CESMPs considered to be of particular relevance to the Hazardous Materials CESMP are as follows:

- Roads and Traffic CESMP – Document No. 1062-TGN-MNG-PLN-PJM-22-00012 (in relation to the transport of hazardous materials)

- Waste Management CESMP - Document No. 1062-TGN-MNG-PLN-PJM-22-00005 (in relation to the management of hazardous waste)
- Pollution Prevention CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00003
- Community Health, Safety and Security CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00011
- Labour and Working Conditions CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00010
- Water CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00007
- Emergency Response Plan, Document No. 1062-TGN-MNG-PLN-PJM-22-00015

5 Roles and Responsibilities

5.1 Overview

An integrated approach to hazardous materials management involves a range of stakeholders, including the Company, the Contractors (and subcontractors), local authorities, regulatory agencies, suppliers of these materials, and the general public. Such a system therefore requires robust processes regarding information dissemination, training, and designation of responsibility, management actions, monitoring, control, and corrective actions.

Generic roles and responsibilities for the Company and Contractors are detailed below. An initial split of activities between key stakeholders is shown in Table 5.1 below with further information on specific responsibilities for CESMP actions outlined in Appendix 1 and Appendix 2.

Table 5.1 Initial Split of Activities

Activities	Beneficiary	Contractors	External providers
Planning	x	x	x
Dissemination of information	x	x	
Management of pollution		x	x
Spill response & treatment		x	x
Professional training	x	x	x
Surveillance and control	x	x	
Monitoring and audit	x	x	
Reporting	x	x	
Corrective actions	x	x	
Management of cooperation	x	x	

The operational cooperation procedures in the construction site will be set in the Statement of Works that will be an Appendix to the Commercial Contract to be signed between the Beneficiary and the Contractor. The Contact Point Unit for each construction site, as defined in the Contractor Management Plan, is the structure responsible for the implementation and monitoring of the provisions in the Statement of Works.

5.2 Company Roles & Responsibilities

Transgaz HSE management roles and responsibilities during the Project construction phase are detailed in the BRUA PMU - Regulation of organization and functioning. Further information is also provided in other documents listed in the F-CESMP document.

With regards to this CESMP, Transgaz S.A. is responsible for key management activities including:

- Development of bidding conditions regarding hazardous materials management;
- Professional training of a Transgaz Hazardous Materials representative on site;
- Monitoring Contractor performance, supervision and control of Contractors;

- Management cooperation in case of an ecologic accident[2] (including registration and communication of events).

Specific roles and responsibilities within the Company presented in Table 5.2 will apply.

Table 5.2 Company Roles and Responsibilities

Role	Responsibility
Director general SNTGN TRANSGAZ SA	- Approves the Hazardous Materials Management Plan
HSSE Coordinator the environmental expert	- Ensures the compliance of the Project with the requirements established in this Plan; - Has the general responsibility for the implementation of this Plan, including by the main Contractors; - Develops, monitors and revises this plan; - Ensures the necessary training for BRUA PMU staff on hazardous materials is delivered; - Centralizes the information regarding the generated hazardous materials and hazardous materials management by the Contractors; - Provides necessary support to the Contractors to enable them to comply with the Hazardous Materials Management Plan; - Ensures this Hazardous Materials Management Plan is available to all BRUA PMU staff and Contractor staff; - Performs regular audits of the main Contractors' performance against the requirements of this Plan; - Reports all the risks, non-compliances with this Plan and incidents; and - Prepares an annual environmental report that includes details regarding the management of hazardous materials
A nominated environmental responsible of TRANSGAZ from PMU-BRUA	Will verify the implementation of contractors' obligations, including regular audits of: - the hazardous materials storage areas; - visual inspections of soil and water in the work area; - whether safety data sheets exist for hazardous materials; - whether hazardous substances are managed according to the safety data sheets; - whether Contractors' have appropriate Intervention Plans in case of accidental pollution.

[2] Ecologic accident – an event resulting from an unforeseen and accidental spillage or emission of a hazardous or polluting substance (whether liquid, solid, gasseous or vapour) that could result in detrimental impacts to the environment and/or local communities (G.E.O. 195/2005 on environment protection, as further amended and supplemented)

5.3 Contractor Roles & Responsibilities

Overarching Contractor HSSE requirements are defined in the relevant articles of their contracts and associated mandatory Annexes. Each contractor must also implement all relevant requirements of the CESMPs, including this Hazardous Materials CESMP. Contactors are also responsible for ensuring that any subcontracted work meets these requirements. In addition, within the Project, responsibility for hazardous materials management lies with the Contractors according to the principle "polluter pays".

Contractors will be required to present to the Beneficiary, represented in the Project by PMU BRUA, in accordance with the requirements, their proposed approaches to:

- Management of hazardous materials on site, including handling and storage;
- Spill recovery and emergency response;
- Any other conditions outlined in this CESMP or its appendices.

In addition, Contractors will present the Beneficiary with details of:

- A nominated environmental responsible on hazardous materials
- Records of any impacts associated with hazardous materials.

Further specific responsibilities of the Contractor/sub-contractors are outlined in the Appendices to this CESMP and in Table 5.3 below.

Table 5.3 Contractor Roles and Responsibilities

Role	Responsibility
- Manager responsible for environmental matters	- Ensures that all construction activities are performed in compliance with the requirements of this Plan. - Produces a Hazardous Materials Management Plan in line with this Plan. - Ensures the proper handling, labelling, storage and management of hazardous materials. - Ensures the proper disposal of hazardous materials in line with national / EU legislation. - Identifies registered and appropriately managed disposal facilities for hazardous materials; and undertakes a review of facilities as part of Project supplier management processes. - Ensures all staff receive the necessary training in relation to hazardous materials management. - Performs regular audits of the working sites to ensure all activities are being undertaken according to the requirements of the Hazardous Materials Management Plan. - Ensures that all information regarding hazardous materials is properly recorded and reported. Ensures the transport of hazardous materials is undertaken by an authorized firm(s), according to the required legal provisions.

	- Produces monthly and annual environmental reports that include details on the management of hazardous materials. - Ensures that all the hazardous materials have associated safety data sheets. - Ensures that all the hazardous materials are managed according to the safety data sheets. - Reports on all risks, non-compliances with this Plan and incidents - Ensures all necessary measures are taken to remedy any non-compliances. - Investigates accidents and incidents and ensures the implementation of measures to prevent further accidents/incidents.

6 Management, Mitigation, Monitoring and Verification

6.1 Management Actions

A range of management actions (and other mitigation measures) are required to be implemented in respect of hazardous materials management. The specific management actions and measures required of Transgaz staff and its Contractors (and sub-contractors) are described in Appendix 1 to this CESMP.

6.2 General Monitoring Activities

Monitoring provisions for this Hazardous Materials Management CESMP have been developed through the process outlined in Table 6.2.

Table 6.2 Approaches to Monitoring

Objective	Approach
1: Risk Based	Monitoring programs to address material issues based on the use of the 'source-pathway-receptor' approach in the EIA. These are commensurate with: • the scale and nature of the activity, • the assessed potential level of impact (and uncertainty thereof), and • the sensitivity of the local environment within the activity area of influence
2: Compliance Based	Additional monitoring programs to meet specific regulatory needs.

By adopting the above approach, the monitoring plans should meet both Transgaz's requirement to understand and manage the Project's potential impacts for each construction activity/ location and any specific requirements of the Romanian authorities. The specific monitoring requirements for this Hazardous Materials CESMP are presented in Appendix 2.

6.3 Management System Verification Monitoring

Management System verification monitoring requirements, as detailed in the F-CESMP Document, are divided into three levels as shown in Table 6.3 below.

Table 6.3 Auditing Management System

Tier	Objective	Responsible	Description
Tier 1:	Transgaz management system audits	Transgaz	These audits are aimed at assessing the Transgaz HSE-MS elements and assessing their continued suitability throughout the project life cycle.
Tier 2:	Transgaz CESMP audits	Transgaz	These audits are undertaken by the Transgaz BRUA team to confirm compliance by the Company and its contractors with the CESMPs.
Tier 3:	Contractor self-audits	Contractor	These audits are to be undertaken by contractors to confirm compliance by themselves and their sub-contractors with the CESMPs and their own HSE-MS. The managing contractors shall ensure that audit reports are provided to Transgaz.

In addition to the above, there are also expected to be regulatory audits and lender compliance monitoring visits. The nature and structure of these will be confirmed with regulators and lenders.

6.4 Key Performance Indicators

Both the General Monitoring and the Management System Verification Processes require robust Key Performance Indicators (KPI) to be developed. These are quantitative or qualitative measurements used to gauge performance over time and can be used to assess the effectiveness of control measures. The KPIs considered relevant to this Hazardous Materials CESMP are shown in Table 6.4 below.

Table 6.4 Key Performance Indicators for Project Hazardous Materials Management

ID	KPI	Target	Monitoring Measure	Associated management actions
KPI-001	Number of reported non-compliances with the requirements of this CESMP	Zero per year	N/A	All measures identified in Appendix 1
KPI-002	Number of non-conformities closed due to corrective actions being taken within the defined timeframe (set on a case by case basis)	100% of all non-conformities remedied within the defined timeframe.	N/A	All measures identified in Appendix 1
KPI-003	Number of reported instances of uncontrolled releases of hazardous materials, resulting in actual or potential harm to humans, property or the environment.	Zero per year Minimise and continued improvement in number of reported non-compliances	HM2	All measures identified in Appendix 1
KPI-004	Number of reports of near misses reviewed for root cause and a corrective action identified and shared across all spreads within 48 hours to prevent future occurrence	100% of near miss reports reviewed and shared	N/A	N/A
KPI-005	Number of complaints received from the community in relation to the management of hazardous materials	Zero per year Minimise and continued improvement in number of reported complaints.	N/A	N/A
KPI-006	% of all staff who have received relevant and adequate training	100% compliance with training requirements.	HM1	N/A

The specific auditing and monitoring requirements for the verification of each of the management measures described within this Hazardous Materials CESMP (Appendix 1) are identified in Appendices 1 and 2. This includes identification of the relevant audit tier level (1 to 3) to be undertaken.

6.5 Training

Training needs for all Transgaz and Contractor staff shall be identified at the outset, before construction works commence, and a training plan developed.

7 Appendices

7.1 Appendix 1: Mitigation Measures & Management Actions

Ref.	Topic	Location	Requirement	Responsibility	Verification Process
HM 001	Hazardous Materials Management	All sites	All requirements in the Environmental Agreement in relation to Hazardous Materials must be met.	Contractor	
HM 002	Hazardous Materials Management	All sites	Any relevant requirements in the Pollution Prevention CESMP associated with Hazardous Materials management should be put in place.	Contractor	
HM 003	Material assessment and selection	All sites	All hazardous materials will be evaluated in accordance with relevant regulatory requirements. Such assessments will be undertaken by a suitably qualified and experienced individual and approved by the H&S and Training Manager.	Contractor	Audit of chemical and hazardous materials register and records
HM 004	Hazardous materials inventory	All sites	All chemical substances and compounds purchased from suppliers used on the site will be accompanied by their Technical Safety Data Sheets that meet the requirements of Regulation 1907/2006 (REACH) as regards their content. The purchase of chemicals for which the supplier can provide proof of their pre-registration to the European Chemicals Agency shall be performed in compliance with the same provision. These will be available in the storage locations and principle points of use.	Contractor	Audit of Technical Safety Data Sheets. Visual confirmation of TSDSs at storage areas and points of use.

Ref.	Topic	Location	Requirement	Responsibility	Verification Process
HM 005	Storage procedures	All sites	Storage of fuel will be in tanks equipped with locking devices and which have secondary containment (with 110% capacity) that are located on a platform in a designated area located away from any watercourse or drain	Contractor	Visual inspections
HM 006	Storage procedures	All sites	*The metal containers for the deposit of used oils shall be adequately marked (with the code of the type of used oil) and they shall be located on concreted surrounded areas. Waste oils will not be stored in underground tanks. Storage tanks will be emptied and inspected regularly for any signs of cracks or holes. The findings of the inspection will be recorded; any cracks or holes will be repaired, and any repairs conducted will be recorded.	Contractor	Visual inspections Audit of records of inspections and any repairs.
HM 007	Spill Response	All sites	Spill kits, protective equipment, and other necessary equipment will be available where hazardous materials are handled, to enable any spills to be cleaned up.	Contractor	Visual inspections
HM 008	First Aid	All sites	Appropriate first aid will be located close to hazardous material storage areas such as eye-wash, showers, and first aid kits.	Contractor	Visual inspections

Ref.	Topic	Location	Requirement	Responsibility	Verification Process
HM 009	Transport	During transport	Hazardous materials will only be transported in vehicles authorized for the transport of hazardous substances according to the requirements of Government Decision No. 1175/2007 and which hold a transport license for hazardous substances and an ADR certificate.	Contractor	Visual inspections Audit of relevant paperwork for the transport of hazardous materials.
HM 010	Transfer procedures	All sites	Dedicated fittings, pipes, and hoses specific to the hazardous materials being stored must be used, and procedures followed to prevent the addition of hazardous materials to the incorrect tank.	Contractor	Visual inspections. Audit of Hazardous Materials Management procedures
HM 011	Transfer procedures	All sites	Equipment that is compatible and suitable for the characteristics of the hazardous material being transferred must be used to ensure safe transfer.	Contractor	Visual inspections
HM 012	Transfer procedures	All sites	The transfer of hazardous materials from vehicles to storage tanks must be conducted on impervious hard standing, which is sloped to a collection or a containment structure, not connected to municipal wastewater/storm water collection system.	Contractor	Visual inspections
HM 013	Transfer procedures	All sites	Written procedures for transfer operations must be prepared that include a checklist of measures to follow during filling operations for storage tanks.	Contractor	Audit of written procedures.

Ref.	Topic	Location	Requirement	Responsibility	Verification Process
HM 014	Storage procedures	All sites	Incompatible materials (acids, bases, flammables, oxidizers, reactive chemicals) must be stored in separate areas, and with containment facilities separating material storage areas. The storage and use of hazardous substances will be done under conditions of maximum security.	Contractor	Visual inspections
HM 015	Storage procedures	All sites	Material-specific storage for extremely hazardous or reactive materials will be provided.	Contractor	Visual inspections
HM 016	Health & Safety	All sites	All sources of ignition near to flammable storage tanks are prohibited.	Contractor	Visual inspections
HM 017	Storage procedures	All sites	Drummed hazardous materials will be stored in areas with impervious surfaces that are sloped, or bunded to retain any spills/leaks	Contractor	Visual inspections

Ref.	Topic	Location	Requirement	Responsibility	Verification Process
HM 018	Fuelling procedures	All sites	Fuelling of vehicles will only be undertaken in specially designated areas inside the site organization and for machines from off site, the supply shall be done only in compliance with all environmental protection norms.	Contractor	Visual inspections
HM 019	Storage procedures	All sites	Containers holding flammable and/or toxic materials will be kept permanently closed and covered. They shall be kept in their original packaging and they shall be handled and transported under maximum security.	Contractor	Visual inspections
HM 020	Emergency response	All sites	There will be strict compliance with all relevant guidelines for health and safety at work and with the provisions of the Emergency Response Plan	Contractor	Internal audit
HM 021	Accidental leaks	All sites	Any accidental leaks of fuel or oil will be immediately cleaned up with absorbent material and collected in closed and labelled containers - temporarily stored in specially designed spaces until delivery to an operator authorized for the collection / disposal of oil waste.	Contractor	Audit of incident reports.
HM 022	Accidental leaks	All sites	All equipment and machinery involved in the construction of the trench will be well maintained and periodically inspected to avoid the accidental loss of fuels and oils.	Contractor	Visual inspections

Ref.	Topic	Location	Requirement	Responsibility	Verification Process
HM 23	Storage procedures	All sites	Chemicals with different hazard symbols should not be stored together	Contractor	Visual inspections
HM 24	General Principles	All Sites	All relevant mitigation measures in relation to the management of hazardous materials included in the Environmental Agreement will be complied with.	Contractor	
HM 25	Disposal	All Sites	All Hazardous Materials must be disposed of according to the requirements of relevant national / EU legislation	Contractor	Audit of relevant paperwork for the disposal of hazardous materials
HM 26	Recording	All Sites	Maintenance of a hazardous materials register which is updated monthly	Contractor	Audit of the register

* Commitment from the Environmental Permit.

7.2 Appendix 2: Monitoring Requirements

ID	Activity	Description	Parameters	Location	Standards	Frequency	Tier (1/2/3)
HM1	Training	Audit of records to demonstrate all contractor/sub-contractor staff have received relevant training	Evidence of training provided.	All construction sites and storage depots	Level of training required	Tier 2 – bi-annual Tier 3 - quarterly	2 & 3
HM2	Storage	Audit of any storage failures	• Incidents of water pollution • Incidents of soil contamination • Health & Safety incidents relating to incorrect storage of hazardous materials	All construction sites and storage depots	Incident reports	Tier 2 – bi-annual Tier 3 - quarterly	2 & 3
HM3	Recording	Audit of the hazardous materials register	Evidence of accurate recording of hazardous materials	All construction sites and storage depots	Register completed accurately	Tier 3 – quarterly	3

7.3 Appendix 3: Relevant Legislation

The indicative list of Romanian national legislation regarding hazardous materials - general framework
Law 360 of September 2nd, 2003 (*republished*) on the regime of hazardous chemical substances and preparations, as further amended and supplemented

European Union Regulations (directly applicable)
Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006
Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC