Titolo

INTERNAL REGULATION PAAT008
COLLECTION AND DISPOSAL OF
MANUFACTORING WASTE

Rev. 4

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Sost. Ediz.

2019

Emittente

Stabilimento Arsenale triestino San Marco

03/07/2017

 $\mathsf{Foglio} \ 1 \ \mathsf{di} \ 16$

AT-SIC

COLLECTION AND DISPOSAL OF MANUFACTURING WASTE

TRIESTE SHIPYARD ARSENALE TRIESTINO SAN MARCO





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PURPOSE AND SCOPE

The purpose of these regulations is to define the technical, organizational, and operational modalities for the removal, transport, and grouping of the various types of waste arising from manufacturing activities carried out in Fincantieri ATSM plants and their production cycles, in addition to the classification, temporary storage, and disposal of waste, in order to ensure compliance with existing environmental laws.

The present regulations apply within the ATSM Shipyard in Trieste, owned by Fincantieri S.p.A. and fully incorporate Norm 041-036 "Collection and disposal of manufacturing waste", including the related 5 annexes.

REFERENCE NORMS

- D. Lgs. 152/06 e s.m.i.
- D. Lgs. 231/01 e s.m.i.
- General conditions FINCANTIERI S.p.A. (C.G.AP.) (C.G.AC)
- UNI EN ISO 14001
- Internal regulation 041-140



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2.1 Legal definitions

Waste: any substance or object that falls within the categories reported in Annex A in the fourth section of Legislative Decree n. 152 of 3 April 2006, and which the holder intends to dispose of or is mandated to dispose of;

Producer: the person whose activities produced the waste, including the initial producer and the person who carried out pre-treatment, mixing, or other activities that changed the nature or composition of said waste;

Holder: the waste producer or the person who holds said waste;

Management: the collection, transport, recovery, and disposal of waste, including oversight of these operations, and the management of landfills after their closure;

Collection: all operations regarding the pick-up, selection, or grouping of waste for transportation;

Separate collection: collection methods that use economic, efficiency, efficiency, and transparency criteria to group municipal waste into homogeneous categories, either upon collection or, for the organic fraction, during treatment as well; and that group packaging waste separately from other municipal waste, on condition that the all of the above-mentioned waste is effectively destined for recycling;

Disposal: any and all operations whose purpose is to remove definitively a substance, material, or object from the economic and/or collection cycle, and in particular any and all operations set out under Annex B of the fourth section of Legislative Decree n. 152 of 3 April 2006;

Recycling: any and all operations that use waste to generate secondary raw materials, fuels, or products through mechanical, thermal, chemical, or biological treatments, including choice and selection, and in particular any and all operations set out under Annex B of the fourth section of Legislative Decree n. 152 of 3 April 2006;

Waste production site: one or more buildings, plants, or other infrastructure linked to one another within an established area in which the productive activities from which waste originates are carried out;



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Storage: disposal activities consisting of the preliminary storage of waste as indicated under point D15 of Annex B of the fourth section of Legislative Decree n. 152 of 3 April 2006; in addition to recovery activities consisting of the storage of materials as set out under point R13 of Annex C of the fourth section;

Temporary storage area: the grouping of waste carried out before collection at the site where the waste itself was produced, under the following conditions:

- ➤ Hazardous and non-hazardous waste must be collected and sent off for recovery and disposal at least every three months, regardless of the quantity being stocked;
- > Temporary storage must be carried out for homogeneous categories of waste and in compliance with all relevant technical norms and, for hazardous waste, in compliance with all norms regulating the storage of the hazardous substances they contain;
- All norms regulating the packaging and labelling of hazardous waste must be complied with;

Waste classification: in order to implement part the fourth section of Legislative Decree n. 152 of 3 April 2006 waste is classified according to origin as either municipal waste or special waste, and according to risk characteristics as either hazardous waste or non-hazardous waste.

- 1. Not Hazardous waste
- 2. Hazardous waste (non-domestic waste explicitly indicated as such, marked by an asterisk, in the list set out under Annex D of the fourth section of Legislative Decree n. 152 of 3 April 2006, on the basis of Annexes G, H and I of the fourth section).

Loading/unloading registry: mandatory registry which records information on the qualitative and quantitative characteristics of waste to be communicated annually to the land registry.

Information must be recorded:

o For producers, no later that within ten working days of the production and unloading of the waste material



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TASKS ENTRUSTED TO SHIPYARD AUTHORITIES

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Granted that general, technical, management and organizational responsibilities regarding the collection, storage, and subsequent disposal at authorized facilities of the waste generated by the shipyard lie with the Temporary Storage Manager (hereafter TSM), with the support of the Production Manager, below we list the tasks entrusted to each authority.

3.1 Tasks entrusted to the Basin Management Manager (BMM)

Drafts specific techniques for shipyard cleaning in collaboration with TSM and SCI and issue all related RDAs.

Setting up pick-up and temporary storage areas.

Maintenance of all temporary storage facilities.

Adopting, upon request by the TSM, all precautions necessary to protect waste from atmospheric agents, in order to avoid any damage or risk to people and the environment, and any undesired changes in the mass of the waste itself.

Adopting administrative measures regarding subcontractors in charge of waste disposal.

3.2 Temporary Storage Manager (TSM)

At the ATSM Shipyard, the Temporary Storage Manager coincides with the Prevention and Protection Service (SIC).

3.3 Protection and Prevention Service (SIC)

Assists the BMM in issuing specific techniques related to the Shipyard Cleaning Service and to the transport and subsequent disposal of manufacturing waste at authorized facilities.

Assists the BMM in fulfilling legal obligations.

Is responsible for "taking delivery of waste" by recording them in the Loading/Unloading Registry (within 10 days of the waste being received in the temporary storage area);

Is responsible for compiling the waste form;



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Ensures that the identification forms associated with waste being sent off for disposal and/or recycling are returned and duly signed to confirm disposal on the part of the responsible subjects (Carrier – Disposal or Recycling Centre, etc.) within 3 MONTHS of pick-up on the part of the carrier; should this not be the case, the SIC shall comply with all legal obligations (informing the regional government of the failure to receive the form).

Ensures that all authorizations regarding the carrier and the waste disposal or recycling site are compatible with the CER code attributed to the waste material in question.

Attaches copies of certificates of analyses provided by the TSM to all identification forms

Verifies, on a monthly basis, the completeness of all administrative documentation.

Verifies, on a bi-weekly basis, the state of temporary storage and the modalities through which these activities are carried out.

Documents the outcome of all inspections and informs the Shipyard Manager.

Carries out, on a yearly basis, waste characterization analyses.

3.4 Production

The organization and oversight of cleaning activities in the various areas (mechanical workshops, external areas, offices, structures, and ships under construction) of the Fincantieri Shipyards is entrusted to Production Managers (Prime Contractors, Centre Managers, Workshop/Office Managers, and Production Supervisors) in accordance with their specific operational skills; additionally, they shall:

Verify, on a daily basis, that all waste from cleaning activities is placed separately in its own containers in accordance to waste type; this activity shall also be carried out concerning containers from ships under construction. With regards to the latter, containers for the collection of waste shall be located both onboard the ship and on the quay. Each container shall bear a sign indicating which type of waste it is meant to hold.

Conserving in small quantities and in an adequate manner in the place of production certain types of waste arising from activities that are part of the productive cycle (painting, non-destructive testing, flushing, motor oil, metal pickling, changing of batteries, changing of toner, changing of oil in machinery, etc.), and sending them to temporary storage no less than once a week.



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Ensuring that the waste to be disposed of by subcontractors is located in the appropriate bins owned by the subcontractors and emptied daily to be sent to disposal at the subcontractor's expense;

Loading and offloading from ships under constructions, at pre-established intervals, suitable bins for the collection of waste, which can ensure adequate safety conditions in light of the type of waste they are meant to hold.

3.5 Procurement Office

Issues purchasing orders for the Cleaning Service (shipyard / ships under construction).

Issues all necessary purchasing orders for the definition of contracts and agreements for waste disposal.

Ensures that all companies contacted for waste transportation and disposal have all the necessary authorizations required by law, including specific ones for the type of waste to be transported and disposed of.

3.6 Administration and Management Control

Responsible for all administrative practices related to payments, and ensures that all necessary documentation attesting to the completion of work is in order.

IDENTIFICATION OF WASTE PRODUCED IN THE WORKPLACE - MODALITIES TO REMOVE WASTE FROM THE WORKPLACE

Partial list of the main types of waste generated in the ATSM Shipyard in Trieste during ship repair and maintenance activities:

20 03 01 NOT HAZARDOUS

Unsorted municipal waste

Place of production: Vessel, public area

Disposal modality: yellow container, plastic bins

Storage: vending machine area – container on the pier – open deck on bard



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<mark>08 01 11*</mark> (LIQUID) HAZARDO l	JS
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<u>Discarded paint containing organic solvents or other hazardous substances (liquid paint, exhaust solvent)</u>

Place of production: various areas of the shipyard/ ship repair and maintenance areas

Disposal modality: sealed barrels placed inside FIBCs on pallets

Storage: Covered drip-pans placed at the entrance to Basin 4.

Transport modality to the temporary storage area: FIBCs on pallets that can be transported with pallet trucks.

08 01 11* (SOLID) **HAZARDOUS**

<u>Discarded paint containing organic solvents or other hazardous substances (solid</u> paint)

Place of production: various areas of the shipyard/ ship repair and maintenance areas

Disposal modality: sealed barrels placed inside FIBCs on pallets

Storage: Covered drip-pans placed at the entrance to Basin 4.

Transport modality to the temporary storage area: FIBCs on pallets that can be transported with pallet trucks.

13 02 05* HAZARDOUS

Mineral-based non-chlorinated engine, gear, and lubricating oils (exhausts oil)

Place of production: ships undergoing maintenance or repairs

Disposal modality: 200-liter barrels - 1 m³ tanks

Storage: Basin 3 area, Basin 4 drip pans

Transport modality to the temporary storage area: 1 m³ metal tanks/barrels;

Collection modality in the place of production: 1 m³ metal tanks/barrels;

13 04 03* HAZARDOUS

Mineral-based non-chlorinated engine, gear, and lubricating oils (Bildge and sludge)

Place of production: ships undergoing maintenance or repairs

Disposal modality: 200-liter barrels – 1 m³ tanks

Storage: Basin 3 area, Basin 4 drip pans

Transport modality to the temporary storage area: 1 m³ metal tanks/barrels;

Collection modality in the place of production: 1 m³ metal tanks/barrels;



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1	5	01	06	NOT HAZARDOUS
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Mixed-material packaging (plastic, wood, glass, paper)

Place of production: Various areas of the shipyard

Disposal modality: 20 m³ demountable metal containers.

Storage: ad hoc areas in the shipyard

Collection modality in the place of production: Picked up by a vehicle directly from the

place of production.

15 01 10* **HAZARDOUS**

Packaging containing remnants of hazardous materials or contaminated by such materials (empty paint cans, bucket)

Place of production: Ships undergoing maintenance or repairs

Disposal modality: Big bags

Storage: Basin 3 area, Basin 4 drip pans

Transport modality to the temporary storage area: FIBCs on pallets

Collection modality in the place of production: FIBCs

15 02 02* **HAZARDOUS**

Absorbents, filters (including unspecified oil filters), rags, and protective clothing contaminated by hazardous materials

Place of production: Ships undergoing maintenance or repairs

Disposal modality: Big bags

Storage: Basin 3 area, Basin 4 drip pans

Transport modality to the temporary storage area: FIBCs on wooden pallets

Collection modality in the place of production: FIBCs

16 01 14* **HAZARDOUS**

Antifreeze liquids containing hazardous substances

Place of production: Ships undergoing maintenance or repairs

Disposal modality: 200-liter barrels

Storage: Basin 3 area, Basin 4 drip pans

Transport modality to the temporary storage area: metal barrels

Collection modality in the place of production: metal barrels

16 02 14 **NOT HAZARDOUS**

Discarded electronic equipment different from that described under 16 02 09 to 16 02

<u>13</u>

Place of production: Various shipyard areas



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Disposal modality: Pallets

Storage: Basin 3 area, Basin 4 drip pans

Transport modality to the temporary storage area: Pallets Collection modality in the place of production: Pallets

16 06 01* <u>Lead Pb batteries</u>

Place of production: Maintenance office / ships undergoing repairs

Disposal modality: Pallets

Storage: watertight container near the maintenance office Transport modality to the temporary storage area: pallets Collection modality in the place of production: pallets

17 04 05 NOT HAZARDOUS

Iron and steel

Place of production: Various shipyard areas Disposal modality: 20 m³ demountable crates

Storage: area of production

Transport modality to the temporary storage area: containers that can be moved with forklifts

Collection modality in the place of production: with trucks equipped with mechanical claws in order to load waste on the spot

17 05 05* (SOLID) **HAZARDOUS**

Hull high-pressure wash waste

Place of production: Basin areas

Disposal modality: FIBCs

Storage: Basin 3 area, Basin 4 drip pans

Transport modality to the temporary storage area: FIBCs

Collection modality in the place of production: FIBCs on pallets

17 06 03* Other insulating material containing or comprised of hazardous materials (wool-

rock)

Place of production: Various shipyard areas

Disposal modality: FIBCs

Storage: Basin 3 area

Transport modality to the temporary storage area: FIBCs

Collection modality in the place of production: FIBCs

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20 01 21* HAZARDOUS

Fluorescent tubes and other waste containing mercury

Place of production: Various shipyard areas

Disposal modality: wooden crates/FIBCs

Storage: Basin 3 area

Transport modality to the temporary storage area: wooden crates/FIBCs

Collection modality in the place of production: wooden crates/FIBCs

20 03 04* Septic tank sludge (Grey/black water)

Place of production: Ships undergoing repairs or maintenance

Disposal modality: picked up by barge

Storage: disposal takes place concurrently with collection

Transport modality to the temporary storage area: -

Collection modality in the place of production: --

20 03 07* Bulky waste (carpet, bedding)

Place of production: Ships undergoing repairs or maintenance

Disposal modality: 20 m³ demountable metal crates

Storage: Basin 3 area, Basin 4 drip pans

Transport modality to the temporary storage area: trucks equipped for the transport

of demountable crates;

Collection modality in the place of production: removal of demountable crates

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TEMPORARY STORAGE

The temporary storage for hazardous and non-hazardous waste for the ATSM Shipyard in Trieste is located in the Basin 4 area.

ADMINISTRATIVE DOCUMENTATION

6.1 Loading/unloading registry

SIC is responsible for the loading/unloading registry, and for compiling it in accordance with existing laws.

6.2 Waste Identification Form

SIC is responsible for compiling and archiving the Waste Identification Form in accordance with existing laws.

WASTE DISPOSAL

The subcontractors responsible for waste disposal and transport must have all the authorizations required by law, and specific to the type of waste to be transported and disposed of; controls must be carried out by ACU and SIC (see paragraphs 3.5 and 3.6).

The subcontractors that are normally in charge of waste disposal at the ATSM Shipyard in Trieste are the following:

Company CRISMANI - SEA SERVICE, Company ITALSPURGHI, Company METFER

In accordance with the instructions provided by FC, the subcontractors are responsible for supplying and positioning the containers for the collection and transport of all relevant waste types. Each container shall bear a sign indicating which type of waste it is meant to hold and the CER code.

7.1 Issuing of transport and disposal requests

COP is responsible for issuing transport and disposal requests, which are subsequently converted into orders by ACU

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7.2 Modalities and schedule for the transfer of waste to collection, recycling, and disposal centres.

Hazardous waste must be collected and sent off for recovery and disposal at least every three months, regardless of the quantity being stocked;

Non-hazardous waste must be collected and sent off for recovery and disposal at least every three months, regardless of the quantity being stocked.

WASTE PRODUCED BY SUBCONTRACTORS

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8.1 Fincantieri dispositions

With regards to the clean-up and removal of manufacturing waste, subcontractors working in the Fincantieri ATSM Shipyard in Trieste must follow:

- Fincantieri norm "Norms for companies operating on Fincantieri premises (mod. NOUS ed. February 2010)", and especially point 14:
- 14. CLEAN-UP AND REMOVAL OF MANUFACTURING WASTE.
- 14.1. The company assumes responsibility for the cleanliness and hygiene of the workspace.
- 14.2. The company shall systematically remove from the workspace all waste material, by-products, packaging, etc., shall separate them according to type and nature and place them in the appropriate containers made available by the facility or by the company in charge of waste disposal, unless otherwise agreed upon. In this last-named case the removal of waste material or hazardous products and their transportation and conferment to authorized disposal or recycling site will be carried out under the responsibility and at the expense of the company, which shall have all necessary authorizations under the law.
- 14.3. The company shall carry out a thorough final clean-up before delivery of the final product, and remove any traces of paint or other substances from walls, floors, and any other surface.
- 14.4. In addition, the disposal of any type of waste at sea, in the sewer network, or on the ground is strictly forbidden.
- General Conditions for Tenders paragraphs 31 "Safety of substances, preparations, products, materials, and supplies" and 20 "works to be carried out on Fincantieri premises"
- Regulatory Contract paragraph 25 "Safety of substances, preparations, products, materials, and supplies"

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8.2 Temporary storage – transport - disposal

Should subcontractors have the need to temporarily stock significant quantities of manufacturing waste from their activities, they shall inform the TSM at once, including through the production managers.

The TSM shall evaluate the feasibility of the request, identify a suitable area, and assign it to the subcontractor making the request; the obligation and responsibility of storage the waste in accordance with existing legislation lies with the subcontractor.

ENVIRONMENTAL SECURITY MEASURES

During the temporary storage, should containers for liquid waste break the spillage must be reduced by transferring the liquid waste to other containers and by cleaning up the concrete storage site using suitable absorbent material.

Waste arising from the operations described above shall be classified and then sent off for disposal in accordance with existing laws.

On worksites, the transfer or liquid or solid waste within containers must be carried out by staff responsible for production or by staff from the cleaning company.

In any event, those performing these operations must be equipped with protective clothing such as protective suits, safety boots, leather or rubber gloves, and if necessary Tyvek disposable overalls, boots, and respiratory protection devices; for such operations it is mandatory to refer to the relevant product safety fact sheet.

Staff from the cleaning company responsible for transporting containers holding special waste, and especially waste classified as hazardous, must be aware of the risks associated with the handling of such material and with the protective measures to be adopted in order to prevent from the containers being damaged during transport, leading to the spillage of said waste. Similar precautions must be adopted while loading and unloading the containers.

Clean-up operations in case of waste spillage either in the temporary storage area or during transport and handling must be carried out by staff from the company in charge of disposal, who must have all necessary safety equipment.

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In either case, and whenever stronger safety measures are necessary, staff must be equipped with Tyvek disposable coveralls, a Plexiglas shield to protect the eyes and face, a respiratory protection mask suitable for the chemicals in question, rubber glovers to handle acid substances, and rubber boots.

In case of spillage or other anomalies related to the handling and storage of potentially hazardous waste or other substances, emergency personnel must be notified immediately via the emergency telephone number

TEL N° **040 - 3185838**

The emergency number operator will immediately inform fire safety personnel, the temporary storage manager, the shipyard services manager, and the protection and prevention services manager;



