



Maryland Green Registry MEMBER

The Maryland Green Registry promotes and recognizes sustainable practices at organizations of all types and sizes. Members agree to share at least five environmental practices and one measurable result while striving to continually improve their environmental performance.

C.W. Wright Construction Company LLC



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Utility Construction

Member since June 2019

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Management and Leadership



Environmental Policy Statement

C.W. Wright Construction Company, LLC was founded in 1953 to serve the electrical utility industry. Our experience comprises all aspects of utility work, licensed to operate in states east of the Mississippi. We are committed to minimizing its impact on the environment. We will strive to improve our environmental performance over time, and to initiate internal projects and activities that will further reduce our impacts on the environment. Our commitment to the environment extends to our customers, our employees, and the communities in which we operate. We are committed to:

- *Comply with all applicable environmental regulations;*
- *Prevent pollution whenever possible;*
- *Train our employees on our environmental program and empower them to be proactive in avoiding and minimizing environmental impacts;*
- *Be prepared to quickly respond to unintentional and unavoidable impacts;*
- *Communicate our environmental commitment and efforts to our customers and communities; and*
- *Continually improve over time by developing environmental metrics and by setting goals to reduce impacts each year.*



Environmental Team

Our Environmental Management System Committee (EMS Committee) consists of the Vice Presidents (upper management) and the ES, and is responsible for:

- a) *the establishment and implementation of the EMS;*
- b) *the establishment and review of objectives, targets, and programs;*
- c) *ensuring the effective implementation of environmentally related operational controls and programs;*
- d) *systematically examining the EMS to ensure the suitability, adequacy and effectiveness;*
- e) *the internal communication of environmental matters between management and employees, and promoting environmental awareness among company staff;*
- f) *the review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary;*
- g) *providing leadership in the pursuit of environmental issues; and*
- h) *holding regular meeting (at approximately six-month intervals).*



Annual Environmental Goals

Our EMS targets the field operations of utility construction, not our facilities. As field construction operations continuously change location and do not have regular direct discharge of pollutants, the EMS addresses non-point source (NPS) pollution. NPS pollution is addressed through the implementation of Best Management Practices (BMPs), and reductions are not directly measurable. Success criteria consist of effective implementation of BMPs.

The objective chosen for 2019 was Spill Prevention and Response. Specifically, we wanted to ensure our field operations take measures to prevent spills, and are equipped and trained to quickly and efficiently respond to unintentional spills. Four targets were set:

- a. *Prepare a Pollution Prevention (P2) Plan;*
- b. *Prepare guides on implementing Spill Prevention and Response;*
- c. *Ensure all crews have access to spill kits, and that the spill kits on site are appropriate to the activity and location; and*
- d. *Train crew members on the location and use of spill kits, and on spill reporting.*

Federal and state spill reporting requirements are:

- *Any spill ≥ 25 gallons;*
- *Any spill, regardless of amount, that causes sheen on surface waters;*
- *Any spill, regardless of amount, that occurs within 100 feet of surface waters;*
- *Any spill < 25 gallons that cannot be cleaned up within 24 hours*

Our large utility clients take spills very seriously. We go beyond the federal requirement and record all spills regardless of the size or location. Our documentation includes the time of spill and response, the amount/extent, clean-up procedures and disposal of spill-contaminated soil and absorbents.

Independently Audited Environmental Management System

While this EMS was modeled after ISO 14001, C.W. Wright is only considering internal, not independent, auditing at this time.

Waste

Hazardous Waste/Toxic Use Reduction

A utility construction project can stretch tens or even hundreds of miles, and unavoidably encounter natural resources such as wetlands and streams. Unintentional discharges occur, such as hydraulic line ruptures. C.W. Wright uses eco-friendly chemicals when possible. Examples include biodegradable hydraulic fluid, water-based cable lubricant, vegetable-based drill oil, and water-based concrete sealant. In general, eco-friendly chemical alternatives are more expensive than those typically used in electric utility construction.

Transportation

Efficient Business Travel

Each of our jobs establishes a muster location, where crew members park their personal vehicles and travel to the job site together in work vehicles. In addition to minimizing the number of vehicles at the job site, this represents a 50-60% reduction in emissions for the commute, which is typically 5-30 miles.

Fleet Vehicles

Our crews do not leave the equipment idling when not necessary. For a given piece of equipment during a typical 10-hour day, this can potentially reduce emissions by 10-15%.

Environmental Certification Programs, Awards, and Other Activities

As part of implementing our EMS, an analysis of the environmental aspects of our field operations was performed. Any aspect of CWW field operations that has the potential to positively or negatively impact the environment is considered. Most are conditions of regulatory permits obtained by the client and/or addressed in the client's Scope of Work. Diligent consideration of these aspects protects the environment and creates a good impression with the client, regulators and the public. Conversely, failure to adequately address any of these aspects can negatively impact the company's business, and can lead to legal and/or financial consequences.

The environmental aspects are evaluated for their significance according to the six criteria listed below. It is assumed that failure to adequately address any environmental aspect has potential business consequences. Significance is scaled from 1=limited/easy/effective to 3=severe/difficult/ineffective.

Evaluation of Significance

Significance Criteria

Environmental Aspects	Significance Criteria						SIGNIFICANCE INDEX***
	Potential for Adverse Effects	Regulated	Financial Consequence	Ease of Controls	Cost of controls	Effectiveness of Control	
Wetland & Stream Protection	3	3	3	3	3	2	12
Spill Prevention & Response	3	3	3	2	2	1	9
Erosion & Sediment Control	3	3	2	2	2	1	8
Threatened/Endangered Species	1	3	3	1	1	1	5
Site Rehabilitation	2	2	2	2	1	1	5
Stormwater Conveyance	2	2	1	2	1	1	4
Record Keeping	1	3	1	1	1	1	3
Waste Management	1	2	1	1	1	1	2
Noise / Vibration	1	1	1	1	1	1	1
Air Emissions	1	1	1	1	1	1	1
Cultural Resource Protection	1	1	1	1	1	1	1

The Significance Index is normalized as the total of significant criteria values minus 1 less than the total number of values. The Significance Index can be used to prioritize site reviews, development of environmental procedures or instructions, and training needs. Environmental Aspects are considered in establishing, implementing and maintaining the Environmental Management System (EMS). They are managed by establishing annual objectives and targets.



Help build a greener, more sustainable Maryland through voluntary practices that reduce environmental impacts and save money.

Learn more at green.maryland.gov

