

Welcome to the

Awards Meeting

January 29, 2026, 10:00 AM EST

You have been joined to the meeting with your **audio muted** by default.

At the designated public comment time we will provide opportunity for you to unmute to speak.

During the meeting, public comments received via e-mail regarding any matter on the agenda for consideration will be read out. Per the Public Notice Agenda posted on JEA.com, public comments by e-mail must be received no later than 9:00 a.m. on the day of the meeting to be read during the public comment portion of the meeting.

Please contact **Camie Evers** by telephone at **(904) 832-3385** or by email at **everca@jea.com** if you experience any technical difficulties during the meeting.

January 29, 2026

[Teams Meeting Info](#)

The Chief Procurement Officer offers the following items for the JEA Awards Consent Agenda. Any item may be removed from the Consent Agenda to the Regular Agenda by a committee member asking that the item be considered separately. **All items on the Consent agenda have been approved by OGC, Budget and the Business Unit Vice President and Chief.** The posting of this agenda serves as an official notice of JEA's intended decision for all recommended actions for **Formal Purchases** as defined by **Section 3-101 of the JEA Procurement Code**. Please refer to JEA's Procurement Code, if you wish to protest any of these items.

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6	Request for Proposals (RFP)	1412071246 RFP Truck 5 Ton Jet Vacuum Loaders 16 CU YD	Phillips	Environmental Products Group, Inc.	Capital	\$2,584,260.00	\$2,488,660.00	N/A	\$2,488,660.00	N/A	One-Time Purchase in FY27 Start Date: 10/01/2026 End Date: 09/30/2027	N
	Advertised: 11/18/2025 Optional Pre-Response Meeting: 11/19/2025, Four (4) Attendees Bids Opened: 12/16/2025 Three (3) Bids Received: Environmental Products Group Inc - \$2,488,660.00 Vac-Con Inc- \$2,573,950.48 Nexttran Corporation - \$3,192,368.00 For additional information contact: Danielle Crawford This award request is for the purchase of four (4) 5 Ton Jet Vacuum Loaders 16 CU YD Trucks to be delivered after October 1, 2026. The trucks are replacement for JEA Water business units. Environmental Products Group Inc. was the highest evaluated and lowest bidder. The price difference between the two lowest bidders for this solicitation was \$85,290.48. Environmental Products group bid \$622,165.00 per unit, which is a savings of \$33,217.95 per unit from what was previously paid in December 2025, for a total savings of \$132,871.80 for the four (4) trucks. The two units that were purchased in December 2025 were acquired through a Sourcewell contract and dealer discounts. Originally, all six units were intended to be included in this RFP; however, due to the failure of two units, immediate purchases were required as critical replacements. The award amount of \$2,488,660.00 for four (4) units is approximately 3.7% lower than the \$2,584,260.00 Budget Estimate and has been deemed reasonable.											
7	Request for Proposal (RFP)	1412066050 (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and Ammonia Sampling Grid	Erixton	Groome Industrial Service Group LLC	Capital	\$2,120,000.00	\$1,445,215.92	N/A	\$1,445,215.92	N/A	Project Completion Start Date: 02/01/2026 End Date: 06/30/2027	N
	Advertised: 11/19/2025 Opened: 12/16/2025 Public Evaluation Meeting: 01/16/2026 Two (2) Proposals Received and Ranked 1. \$1,445,215.92 Groome Industrial Service Group LLC 2. \$3,752,473.00 Peerless Mfg Co For additional information contact: Jason Behr Units B52 and B53 route exhaust heat to their Heat Recovery Steam Generators (HRSGs), which include Selective Catalytic Reduction (SCR) systems to reduce NOx emissions to EPA-permitted levels. This project will upgrade both HRSG ammonia injection grids to an improved lance injection system, add downstream sampling grids for tuning, and upgrade or replace all associated AIG instrumentation and valves. This project was originally solicited in August. The responses received either proposed alternate solutions that did not comply with the technical specifications outlined in the solicitation, were incomplete, or exceeded JEA's budgetary estimates by a significant margin. As a result, JEA made the decision to cancel the solicitation. For the subsequent solicitation, the technical specifications were revised to allow for alternative solutions, provided they met JEA's operational and performance requirements. The rebid was conducted as an evaluated solicitation, with selection criteria including Price, Depth of Proposal, Safety, Schedule, and Quality/Craftsmanship. The two proposals received were comparable across all evaluation criteria except price. Groome Industrial Service submitted a significantly lower-priced proposal, resulting in the highest overall evaluation score and selection for award. The original budgetary estimate for this project was \$2,120,000.00. The recommended award amount is \$1,445,215.92, which is considered fair and reasonable. By allowing innovative technology solutions within the revised technical specifications, JEA achieved a cost savings of \$674,784.00.											
Consent Agenda Action												
Committee Members in Attendance	Names											
Motion by:												
Second By:												
Committee Decision												

Regular Agenda												
Award #	Type of Award	Solicitation # & Short Description/Title	VP	Awardee	Award Amount	Business Unit Estimate	Original Award Amount	New Not-to-Exceed	Amendments	Term	JSEB Participation (Y/N) If Y, then list company name(s) (% , \$ - awarded)	Action
1	Invitation for Bid (IFB)	1412069448 Blacks Ford WRF to Veterans Parkway Reclaimed WM Project	Zammataro	J.B. Coxwell Contracting, Inc.	\$2,978,781.00	\$6,588,173.00	N/A	\$2,978,781.00	N/A	Project Completion Start: 02/13/2026 End: 09/30/2027	Y DJ Contracting, Inc. (Materials) - \$64,044.00 D and J Erosion Control Specialists, Inc. (Erosion Control) - \$7,100.00	Motion by: _____
	Advertised: 11/17/2025 Pre-Bid Meeting: 12/03/2025 Opened: 01/12/2026 Six (6) Responses Received J.B. Coxwell Contracting, Inc. - \$2,978,781.00 T G Utility Company Inc. - \$3,008,700.00 T B Landmark Construction Inc. - \$3,123,419.00 Garney Companies Inc. - \$3,185,544.00 Callaway Contracting, Inc. - \$3,402,604.71 DBE Utility Services - \$3,895,905.00 For additional information contact: Dan Kruck This contract award request is for construction services to construct approximately 3,700 LF of new 24" ductile iron (DI) pipe along Reclamation Dr. by open cut method, approximately 2,400 LF of new 30" HDPE DR 11 by horizontal directional drilling (HDD) method, and fittings, valves, flushing valves and other appurtenances for a complete and operable system as depicted on the plans. This project will supply several large development projects with reclaimed water in the Blacks Ford WRF reclaimed water network. The low bid came in approximately 55% below JEA's pre-bid engineer's estimate, driven primarily by lower-than-anticipated pricing for metal materials, including ductile iron pipe, and a significantly reduced cost for the HDD work. The engineer's estimate incorporated conservative, worst-case assumptions and the potential for a non-local contractor, which contributed to the variance. Project staff reviewed the bid in detail and confirmed the pricing is reasonable and consistent with recent comparable work. Given the alignment among bidders and JEA's positive experience with the low bidder, project staff and Procurement recommend proceeding with award.											Second by: _____
2	Request for Proposal (RFP)	1412080446 (RFP) Brandy Branch Generating Station B52-B53 SCR Catalyst Replacement	Erixton	Cormetech, Inc.	\$1,287,700.00	\$2,650,000.00	N/A	\$1,287,700.00	N/A	Project Completion Start Date: 02/01/2026 End Date: 06/30/2027	N	Motion by: _____
	Advertised: 11/19/2025 Opened: 12/16/2025 Public Evaluation Meeting: 01/16/2026 Four (4) Proposals Received and Ranked Option 1 - Base Bid (In-Kind) Option 2 - Low DP Option 3 - Low DP Extended Life Option 4 - Dual Catalyst 1. Cormetech - \$1,201,000.00 1. Cormetech - \$1,197,000.00 1. Cormetech - \$1,287,700.00 1. Cormetech - \$1,791,200.00 2. Ceram USA - \$1,210,000.00 2. Peerless Mfg Co - \$2,441,913.00 2. Peerless Mfg Co - \$2,576,010.00 2. Peerless Mfg Co - \$3,750,190.00 3. Peerless Mfg Co - \$2,429,459.00 4. Groome Industrial Service Group LLC - \$671,875.00 (Installation Only) For additional information contact: Jason Behr Units 2 and 3 route exhaust heat to their Heat Recovery Steam Generators (HRSGs) to produce steam for Unit 4. Each HRSG includes a Selective Catalytic Reduction (SCR) system that reduces NOx emissions to EPA-permitted levels. This solicitation is to contract a vendor to manufacture and install a new SCR catalyst, including removal and disposal of the existing catalyst and replacement with a new catalyst meeting the required performance guarantees. The project was first solicited in August. However, the responses received either proposed non-compliant alternative solutions, were incomplete, or significantly exceeded JEA's budget estimates. Consequently, JEA elected to cancel the solicitation. For the reissued solicitation, the technical specifications were updated to permit alternative solutions, provided they satisfied JEA's operational and performance requirements. The revised solicitation allowed JEA to evaluate four distinct technical options: (1) in-kind replacement, (2) low-pressure-drop design, (3) low-pressure-drop design with extended life, and (4) a dual-catalyst solution. The solicitation was conducted as an evaluated procurement, with selection criteria including Price, Depth of Proposal, Safety, Schedule, and Warranty. JEA received four (4) proposals, each of which was evaluated independently against the established criteria for all four options. Cormetech achieved the highest overall evaluation ranking across all options. Following a comprehensive review of the technical and commercial merits of each option, JEA determined that the Low Pressure Drop Design with Extended Life represents the best overall value to the organization. The original budgetary estimate for this project was \$2,650,000.00. The recommended award amount is \$1,287,700.00 which is considered fair and reasonable. By allowing innovative technology solutions within the revised technical specifications, JEA achieved a cost savings of \$1,362,300.00.											Second by: _____
Consent and Regular Agenda Signatures												
Budget	Name/Title	_____										
Awards Chairman	Name/Title	_____										
Procurement	Name/Title	_____										
Legal	Name/Title	_____										

Award #1 Supporting Documents 01-29-2026

JEA Awards Agenda

January 22, 2026

225 North Pearl St., Jacksonville, FL 32202 - Hydrangea Room 1st Floor

[Teams Meeting Info](#)

Consent Agenda

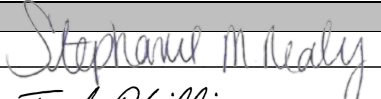
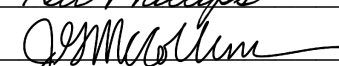
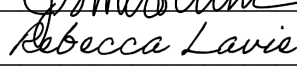
The Chief Procurement Officer offers the following items for the JEA Awards Consent Agenda. Any item may be moved from the Consent Agenda to the Regular Agenda by a committee member asking that the item be considered separately. All items on the Consent agenda have been approved by OGC, Budget and the Business Unit Vice President and Chief. The posting of this agenda serves as an official notice of JEA's intended decision for all recommended actions for **Formal Purchases** as defined by **Section 3-101 of the JEA Procurement Code**. Please refer to JEA's Procurement Code, if you wish to protest any of these items.

Award #	Type of Award	Solicitation # & Short Description/Title	VP	Awardee	Funding Source	Business Unit Estimate	Award Amount	Original Award Amount	New Not-to-Exceed	Amendments	Term (Projected) Start Date - End Date	JSEB Participation (Y/N) If Y, then list company name(s) (% , \$ - awarded)
1	Minutes	Minutes from 01/15/2026 Meeting	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	Contract Increase	1411883046 - Design Services for Monument Rd - AE-WRF to St. John's Bluff Rd	Zammataro	Jacobs Engineering Group, Inc	Capital	\$831,000.00	\$830,457.74	\$232,583.00	\$1,086,040.74	12/08/2025 - \$23,000.00	Project Completion Start: 07/13/2025 End: 12/09/2026	Yes CSI - Geotechnical Services - \$36,476.50 C&ES Consultant - Civil Site Design - \$115,310.08
Last awarded: 05/01/2025 For additional information contact: Marline McDonald This contract increase is for engineering services for the Monument Road 24-inch Reclaimed Water Main project, including design, permitting, bid support, and construction-phase assistance. The work covers approximately 7,250 linear feet of new 24-inch reclaimed water main from Arlington East WRF to St. Johns Bluff Road North, generally parallel to the existing 20-inch main, and includes evaluation of alternate alignments. The main will begin outside the Arlington East WRF perimeter fence, run along Millcoe Road to Monument Road, then continue northeast to St. Johns Bluff Road North and connect to the existing 30-inch reclaimed water main. This contract increase is needed because the original award was limited to Phase 1, which covered the 10% design (route study) only. JEA staff has reviewed the change order quote and determined that the proposed pricing is reasonable when compared to current projects being undertaken by JEA.												

Consent Agenda Action

Committee Members in Attendance	Names	Ted Phillips, Jordan Pope, Juli Crawford
Motion by:	Jordan Pope	
Second By:	Juli Crawford	
Committee Decision	Approved	

Consent and Regular Agenda Signatures

Budget	Name/Title	
Awards Chairman	Name/Title	
Procurement	Name/Title	
Legal	Name/Title	

Award #2 Supporting Documents 01/29/2026

Appendix B - Response Workbook for 1412016046 ITN for Circuit Breakers for JEA Inventory Stock FY26 - FY32

Vendor Name:

Instructions for Scenario A: Initial annual fixed prices, with supplier pre-set annual fixed price for each subsequent year with payment milestone terms (ie. 20% at PO creation, 80% at delivery; all done at net 30). Only the approved manufacturers and part numbers specified in Columns D,E will be accepted and no substitute products will be allowed. Enter the manufacturer name and part number being quoted in column F. The lead-time entered in Column P must be the number of calendar days after receipt of order that JEA will receive the material, not the number of days to ship. This should be as number of days, do not quote a range. Any blanks left on the workbook will be considered to be a "no bid." Your quoted unit price for Column G must be entered into columns H through O. If quoting multiple manufacturers, please submit additional sheet. If estimated usage is zero, please continue to provide price/ea for a minimum order in case our demand picks up. For items GCBSC006, GCBS008, and GCBSC009 see section 5 of SF6 GAS SYNCH CLOSE CIRCUIT BREAKER TECHNICAL SPECIFICATIONS.																				Bid Total		\$0.00						
JEA Item ID	Item Description	UOM	Mfg Name	Mfg Part Number	Vendor Quoted MFG/PN from DROPSHIN	Vendor Quoted Unit Price (Unit must match UOM in Column C)	2027	2028	2029	2030	2031	2032	2033	2034	Lead Time in Calendar Days After Receipt of Order	Country of Origin (COO)	Contractual Minimum Quantities, if applicable	Total Demands	2027	2028	2029	2030	2031	2032	2033	2034	Six (6) Year Total Estimate	Extended Six (6) Year Price
GCBAR003	BREAKER, DEADTANK, SF6, 145KV, 3000A, 650KV BIL, SOKA, SPRING, COMPOSITE BUSHINGS,	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	DT3-145-63 F1 145KV 120-SMTT-SOF	GE GRID SOLUTIONS DT3-145-63 F1			165118	173374	182042	199144				756 Approx. Slots will be reserved based on JEA's needs once awarded.	United States		0									0	
GCBAR004	BREAKER, DEADTANK, SF6, 245KV, 3000A, 900KV BIL, SOKA, SPRING, COMPOSITE BUSHINGS,	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	GE GRID SOLUTIONS DT3-245 P 63 F1 HITACHI 245KV MITSUBISHI 200-SFMT-SOF	GE GRID SOLUTIONS DT3-245 P 63 F1			224640	235875	247670	260050				1,120 Approx. Slots will be reserved based on JEA's needs once awarded.	United States		42			4	30	8				10454000	
GCBS006	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 72.5KV, 3000A, 350KV BIL, SOKA, SPRING, COMPO	Each	mitsubishi	ORD/SPECS/DRAWINGS	mitsubishi													3			1*		1	1			0	
GCBS008	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 145KV, 3000A, 650KV BIL, SOKA, SPRING, COMPOS	Each	mitsubishi	ORD/SPECS/DRAWINGS	mitsubishi													3			1*		1	1			0	
GCBS009	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 245KV, 3000A, 900KV BIL, SOKA, SPRING, COMPOS	Each	mitsubishi	ORD/SPECS/DRAWINGS	mitsubishi													3			1*		1	1			0	

*The initial order of the Synch Close items we would like to receive as soon as possible, without expedite fees, since this will be the first time these items are carried in stock

Award #2 Supporting Documents 01/29/2026

Appendix B - Response Workbook for 1412016046 ITN for Circuit Breakers for JEA Inventory Stock FY26 - FY32

Vendor Name:

Instructions for Scenario B: Initial annual fixed prices, with supplier pre-set annual fixed price for each subsequent year with no payment milestone terms (net 30 at delivery). Only the approved manufacturers and part numbers specified in Columns D,E will be accepted and no substitute products will be allowed. Enter the manufacturer name an part number being quoted in column F. The lead-time entered in Column P must be the number of calendar days after receipt of order that JEA will receive the material, not the number of days to ship. This should be as number of days, do not quote a range. Any blanks left on the workbook will be considered to be a "no bid." Your quoted unit price for Column G must be entered into columns H through O. If quoting multiple manufacturers, please submit additional sheet. If estimated usage is zero, please continue to provide price/ea for a minimum order in case our demand picks up. For Items GCBSC006, GCBSC008, and GCBSC009 see section 5 of SF6 GAS SYNCH CLOSE CIRCUIT BREAKER TECHNICAL SPECIFICATIONS.																				Bid Total		50.00						
JEA Item ID	Item Description	UOM	Mfg Name	Mfg Part Number	Vendor Quoted MFG/PN from DROPDOWN	Vendor Quoted Unit Price (Unit must match UOM in Column C)	2027	2028	2029	2030	2031	2032	2033	2034	Lead Time in Calendar Days After Receipt of Order	Country of Origin (COO)	Contractual Minimum Quantities, if applicable	Total Demands	2027	2028	2029	2030	2031	2032	2033	2034	Six (6) Year Total Estimate	Extended Six (6) Year Price
GCBAR003	BREAKER, DEADTANK, SF6, 145KV, 3000A, 650KV BIL, SOKA, SPRING, COMPOSITE BUSHINGS,	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	DT3-145-63 F1 145KV 120-SMT-SOF	GE GRID SOLUTIONS DT3-145-63 F1			181830	190712	200246	199144				756 Approx. Slots will be reserved based on JEA's needs	United States		0										0
GCBAR004	BREAKER, DEADTANK, SF6, 245KV, 3000A, 900KV BIL, SOKA, SPRING, COMPOSITE BUSHINGS,	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	GE GRID SOLUTIONS DT3-245 P 63 F1 HITACHI 245KV MITSUBISHI 200-SFMT-SOF	GE GRID SOLUTIONS DT3-245 P 63 F1			247104	259463	272437	286055				1,120 Approx. Slots will be reserved based on JEA's needs	United States		42			4	30	8				11499402	
GCBSC006	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 72.5KV, 3000A, 350KV BIL, SOKA, SPRING, COMPO	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													3			1*		1		1		0	
GCBSC008	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 145KV, 3000A, 650KV BIL, SOKA, SPRING, COMPOS	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													3			1*		1		1		0	
GCBSC009	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 245KV, 3000A, 900KV BIL, SOKA, SPRING, COMPOS	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													5			1*		1		1		0	

Award #2 Supporting Documents 01/29/2026

Appendix B - Response Workbook for 1412016046 ITN for Circuit Breakers for JEA Inventory Stock FY26 - FY32

Vendor Name:

Instructions for Scenario A: Initial annual fixed prices, with supplier pre-set annual fixed price for each subsequent year with payment milestone terms (ie. X% at PO creation, X% at delivery; all done at net 30). Only the approved manufacturers and part numbers specified in Columns D,E will be accepted and no substitute products will be allowed. Enter the manufacturer name and part number being quoted in column F. The lead-time entered in Column P must be the number of calendar days after receipt of order that JEA will receive the material, not the number of days to ship. This should be as number of days, do not quote a range. Any blanks left on the workbook will be considered to be a "no bid." Your quoted unit price for Column G must be entered into columns H through O. If quoting multiple manufacturers, please submit additional sheet. If estimated usage is zero, please continue to provide price/ea for a minimum order in case our demand picks up. For items GCBSC006, GCBSC008, and GCBSC009 see section 5 of SF6 GAS SYNCH CLOSE CIRCUIT BREAKER TECHNICAL SPECIFICATIONS.																									Bid Total			
JEA Item ID	Item Description	UOM	Mfg Name	Mfg Part Number	Vendor Quoted MFG/PN from DROPDOWN	Vendor Quoted Unit Price (Unit must match UOM in Column C)	2027	2028	2029	2030	2031	2032	2033	2034	Lead Time in Calendar Days After Receipt of Order	Country of Origin (COO)	Contractual Minimum Quantities, if applicable	Total Demands	2027	2028	2029	2030	2031	2032	2033	2034	Six (6) Year Total Estimate	Extended Six (6) Year Price
GCBAR003	BREAKER, DEADTANK, SF6, 145KV, 3000A, 650KV BIL, SOKA, SPRING, COMPOSITE BUSHINGS,	Each	GE GRID SOLUTIONS HITACHI	DT3-145-63 F1 145KV 120-SMT-50F														0									0	
GCBAR004	BREAKER, DEADTANK, SF6, 245KV, 3000A, 900KV BIL, SOKA, SPRING, COMPOSITE BUSHINGS,	Each	GE GRID SOLUTIONS HITACHI	DT3-245 P 63 F1 245KV 200-SMT-50F														42			4	30	8				0	
GCBSC006	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 72.5KV, 3000A, 350KV BIL, SOKA, SPRING, COMPO	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													3			1*		1		1		0	
GCBSC008	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 145KV, 3000A, 650KV BIL, SOKA, SPRING, COMPOS	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													3			1*		1		1		0	
GCBSC009	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 245KV, 3000A, 900KV BIL, SOKA, SPRING, COMPOS	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													5			1*		1		1		0	

*The initial order of the Synch Close items we would like to receive as soon as possible, without expedite fees, since this will be the first time these items are carried in stock

Award #2 Supporting Documents 01/29/2026

Appendix B - Response Workbook for 1412016046 ITN for Circuit Breakers for JEA Inventory Stock FY26 - FY32

Vendor Name:

Instructions for Scenario B: Initial annual fixed prices, with supplier pre-set annual fixed price for each subsequent year with no payment milestone terms (net 30 at delivery). Only the approved manufacturers and part numbers specified in Columns D,E will be accepted and no substitute products will be allowed. Enter the manufacturer name and part number being quoted in column F. The lead-time entered in Column P must be the number of calendar days after receipt of order that JEA will receive the material, not the number of days to ship. This should be as number of days, do not quote a range. Any blanks left on the workbook will be considered to be a "no bid." Your quoted unit price for Column G must be entered into columns H through O. If quoting multiple manufacturers, please submit additional sheet. If estimated usage is zero, please continue to provide price/ea for a minimum order in case our demand picks up. For items GCBSC006, GCBSC008, and GCBSC009 see section 5 of SF6 GAS SYNCH CLOSE CIRCUIT BREAKER TECHNICAL SPECIFICATIONS.																											Bid Total		
																											\$0.00		
JEA Item ID	Item Description	UOM	Mfg Name	Mfg Part Number	Vendor Quoted MFG/PN from BIDDORROW	Vendor Quoted Unit Price (Unit must match UOM in Column C)	2027	2028	2029	2030	2031	2032	2033	2034	Lead Time in Calendar Days After Receipt of Order	Country of Origin (COO)	Contractual Minimum Quantities, if applicable	Total Demands	2027	2028	2029	2030	2031	2032	2033	2034	Six (6) Year Total Estimate	Extended Six (6) Year Price	
GCBAR003	BREAKER, DEADTANK, SF6, 145KV, 3000A, 650KV BIL, SOKA, SPRING, COMPOSITE BUSHINGS,	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	DT3-145-63 F1 145KV 120-SMT-50F														0									0		
GCBAR004	BREAKER, DEADTANK, SF6, 245KV, 3000A, 900KV BIL, SOKA, SPRING, COMPOSITE BUSHINGS,	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	GE GRID SOLUTIONS DT3-245 P 63 F1 HITACHI 245KV MITSUBISHI 200-SFMT-50F														42			4	30	8					0	
GCBSC006	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 72.5KV, 3000A, 350KV BIL, SOKA, SPRING, COMPO	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													3			1*		1		1		0		
GCBSC008	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 145KV, 3000A, 650KV BIL, SOKA, SPRING, COMPOS	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													3			1*		1		1		0		
GCBSC009	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 245KV, 3000A, 900KV BIL, SOKA, SPRING, COMPOS	Each	MITSUBISHI	ORD/SPECS/DRAWINGS	MITSUBISHI													5			1*		1		1		0		

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Award #2 Supporting Documents 01/29/2026

Appendix B - Response Workbook for 1412016046 ITN for Circuit Breakers for JEA Inventory Stock FY26 - FY32

Vendor Name:

Instructions for Scenario C: One fixed price for initial term that adjusts annually to an index mix per the solicitation with payment milestone terms (ie: X% at PO creation, X% at delivery, all done at net 30). Only the approved manufacturers and part numbers specified in Columns D,E will be accepted and no substitute products will be allowed. Enter the manufacturer name and part number being quoted in Column F. The lead-time entered in Column H must be the number of calendar days after receipt of order that JEA will receive the material, not the number of days to ship. This should be as number of days, do not quote a range. Any blanks left on the workbook will be considered to be a "no bid." Your quoted unit price must be entered into Column G. If quoting multiple manufacturers, please submit additional sheet. If estimated usage is zero, please continue to provide price/ea for a minimum order in case our demand picks up. For Items GCBS006, GCBS008, and GCBS009 see section 5 of SF6 GAS SYNCH CLOSE CIRCUIT BREAKER TECHNICAL SPECIFICATIONS.																				Bid Total		\$0.00
JEA Item ID	Item Description	UOM	Mfg Name	Mfg Part Number	Vendor Quoted MFG/PN from DROPDOWN	Vendor Quoted Unit Price (Unit must match UOM in Column C)	Lead Time in Calendar Days After Receipt of Order	Country of Origin (COO)	Contractual Minimum Quantities, if applicable	Total Demands	2027	2028	2029	2030	2031	2032	2033	2034	Six (6) Year Total Estimate	Extended Six (6) Year Price		
GCBAR003	BREAKER, DEADTANK, SF6, 145KV, 3000A, 650KV BIL, 50KA, SPRING, COMPOSITE BUSHINGS, 7	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	DT1-145-63 F1 145KV 120-SMFT-50F						0												
GCBAR004	BREAKER, DEADTANK, SF6, 245KV, 3000A, 900KV BIL, 50KA, SPRING, COMPOSITE BUSHINGS, 7	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	GE GRID SOLUTIONS DT1-245 P 63 F1 HITACHI 245KV MITSUBISHI 200-SFMT-50F						42			4	30	8					0		
GCBS006	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 72.5KV, 3000A, 350KV BIL, 50KA, SPRING, COMPOS	Each	MITSUBISHI	OBD/SPECS/DRAWINGS	MITSUBISHI					3			1*			1		1		0		
GCBS008	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 145KV, 3000A, 650KV BIL, 50KA, SPRING, COMPOS	Each	MITSUBISHI	OBD/SPECS/DRAWINGS	MITSUBISHI					3			1*			1		1		0		
GCBS009	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 245KV, 3000A, 900KV BIL, 50KA, SPRING, COMPOS	Each	MITSUBISHI	OBD/SPECS/DRAWINGS	MITSUBISHI					5			1*			1		1		0		

*The initial order of the Synch Close Items we would like to receive as soon as possible, without expedite fees, since this will be the first time these items are carried in stock

Award #2 Supporting Documents 01/29/2026

Appendix B - Response Workbook for 1412016046 ITN for Circuit Breakers for JEA Inventory Stock FY26 - FY32

Vendor Name:

Instructions for Scenario D: One fixed price for initial term that adjusts annually to an index mix per the solicitation with no payment milestone terms (net 30 at delivery). Only the approved manufacturers and part numbers specified in Columns D,E will be accepted and no substitute products will be allowed. Enter the manufacturer name an part number being quoted in Column F. The lead-time entered in Column H must be the number of calendar days after receipt of order that JEA will receive the material, not the number of days to ship. This should be as number of days, do not quote a range. Any blanks left on the workbook will be considered to be a "no bid." Your quoted unit price must be entered into Column G. If quoting multiple manufacturers, please submit additional sheet. If estimated usage is zero, please continue to provide price/ea for a minimum order in case our demand picks up. For items GCBSC006, GCBSC008, and GCBSC009 see section 5 of SF6 GAS SYNCH CLOSE CIRCUIT BREAKER TECHNICAL SPECIFICATIONS.											Bid Total										
JEA Item ID	Item Description	UOM	Mfg Name	Mfg Part Number	Vendor Quoted MFG/PN from DROPDOWN	Vendor Quoted Unit Price (Unit must match UOM in Column C)	Lead Time in Calendar Days After Receipt of Order	Country of Origin (COO)	Contractual Minimum Quantities, if applicable	Total Demands	2027	2028	2029	2030	2031	2032	2033	2034	Six (6) Year Total Estimate	Extended Six (6) Year Price	
GCBAR003	BREAKER, DEADTANK, SF6, 145KV, 3000A, 650KV BIL, 50KA, SPRING, COMPOSITE BUSHINGS	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	DT1-145-63 F1 145KV 120-SMFT-50F						0										N/A	
GCBAR004	BREAKER, DEADTANK, SF6, 245KV, 3000A, 900KV BIL, 50KA, SPRING, COMPOSITE BUSHINGS	Each	GE GRID SOLUTIONS HITACHI MITSUBISHI	GE GRID SOLUTIONS DT1-245 P 63 F1 HITACHI 245KV MITSUBISHI 200-SFMT-50F	MITSUBISHI 200-SFMT-50F	240504	730	Built and assembled in the US	N/A	42			4	30	8					0	N/A
GCBSC006	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 72.5KV, 3000A, 350KV BIL, 50KA, SPRING, COMPOSITE BUSHINGS	Each	MITSUBISHI	OBD/SPECS/DRAWINGS	MITSUBISHI	306474	730	Built and assembled in the US	N/A	3			1*			1		1		10101168	N/A
GCBSC008	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 145KV, 3000A, 650KV BIL, 50KA, SPRING, COMPOSITE BUSHINGS	Each	MITSUBISHI	OBD/SPECS/DRAWINGS	MITSUBISHI	307035	730	Built and assembled in the US	N/A	3			1*			1		1		919422	N/A
GCBSC009	BREAKER, DEADTANK, SYNCH CLOSE, SF6, 245KV, 3000A, 900KV BIL, 50KA, SPRING, COMPOSITE BUSHINGS	Each	MITSUBISHI	OBD/SPECS/DRAWINGS	MITSUBISHI	319248	730	Built and assembled in the US	N/A	5			1*			1		1		921105	N/A
																				1596240	

*The initial order of the Synch Close items we would like to receive as soon as possible, without expedite fees, since this will be the first time these items are carried in stock

Pricing would need to be adjusted 6 months prior to delivery which we have recently been doing with JEA for orders

Adjustment would be per the Quote that was sent originally

With deliveries being further clarified with a need for 4 breakers in 2029 and 30 breakers in 2030 and 8 breakers in 2031.

We will offer all breakers in each year with a mutually agreed upon delivery schedule to be determined between MEPP1 and JEA.

Please note that for 2029 deliveries per the BAFO RFQ, earlier deliveries can be provided into 2028 without expediting fees.

In addition, if existing terms are utilized, a further reduction can be provided

JEA Awards Agenda December 12, 2024 225 North Pearl St., Jacksonville, FL 32202 - Hydrangea Room 1st Floor												
Teams Meeting Info												
Consent Agenda												
The Chief Procurement Officer offers the following items for the JEA Awards Consent Agenda. Any item may be moved from the Consent Agenda to the Regular Agenda by a committee member asking that the item be considered separately. All items on the Consent agenda have been approved by OGC, Budget and the Business Unit Vice President and Chief. The posting of this agenda serves as an official notice of JEA's intended decision for all recommended actions for Formal Purchases as defined by Section 3-101 of the JEA Procurement Code . Please refer to JEA's Procurement Code, if you wish to protest any of these items.												
Award #	Type of Award	Solicitation # & Short Description/Title	VP	Awardee	Funding Source	Business Unit Estimate	Award Amount	Original Award Amount	New Not-to-Exceed	Amendments	Term (Projected) Start Date - End Date	JSEB Participation (Y/N) If Y, then list company name(s) (%, \$ - awarded)
1	Minutes	Minutes from 12/05/2024 Meeting	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	Renewal	030-21 - Dental Insurance Plans	Moser	Metropolitan Life Insurance Company	Self-Funded Medical Claims Pass Through	\$1,800,000.00	\$1,800,000.00	\$1,347,874.20	\$6,355,832.75	12/08/2022 - \$1,400,000.00 11/30/2023 - \$1,500,000.00 10/30/2024 - \$307,958.55	One (1) Year w/Four (4) – One (1) Yr. Renewals Start Date: 01/01/2022 End Date: 12/31/2025	N
	Originally Awarded: 08/12/2021 For additional information contact: Elaine Selders This Award requests a one-year contract renewal for the Dental Insurance Plans. The first one-year renewal was completed on 12/08/2022 in the amount of \$1,400,000.00. The second one-year renewal was completed on 11/30/2023 in the amount of \$1,500,000.00. An administrative increase in the amount of \$307,958.55 was completed on 10/30/24 as the contract had reached its maximum indebtedness due to increased enrollment and additional funds were needed to pay for rest of the calendar year. This award is for the third one-year renewal for this contract. MetLife had a rate guarantee for the first two years and a 5% rate cap for the third and fourth years of the contract. The 5% PPO rate increase has been included in the award amount. The fifth-year renewal will be completed through negotiations without a cap. If the rates are not reasonable, JEA will rebid the services. It should be noted the award amount is an estimate based on historical use which fluctuates based on enrollment and services provided.											
3	Renewal	1410758047 - Basic Life/Accidental Death & Dismemberment (AD&D), Voluntary Life/AD&D, Stand-Alone Voluntary AD&D, Short Term Disability, Long Term Disability And Family Medical Leave Act (FMLA) Administration Services	Moser	Standard Insurance Company	Self-Funded Medical Claims Pass Through	\$3,230,000.00	\$3,230,000.00	\$2,572,472.00	\$9,060,103.67	11/30/2023 - \$2,880,000.00 10/30/2024 - \$377,631.67	One (1) Year w/Four (4) – One (1) Yr. Renewals Start Date: 01/01/2023 End Date: 12/31/2025	N
	Originally Awarded: 10/13/2022 For additional information contact: Elaine Selders This Award requests a one-year contract renewal for Basic Life/Accidental Death & Dismemberment (AD&D), Voluntary Life/AD&D, Stand-Alone Voluntary AD&D, Short Term Disability and Long Term Disability. The first renewal was approved by the awards committee on 11/30/2023 in the amount of \$2,880,000.00. An administrative increase in the amount of \$377,631.67 was completed on 10/30/24 as the contract had reached its maximum indebtedness due to increased enrollment and additional funds were needed to pay for rest of the calendar year. This award is for the second one-year renewal. The rates are guaranteed for three years. At the end of the three (3) year period, JEA and our HR broker (Gallagher) will negotiate a favorable renewal rate for the remaining plan years in the contract term. Rate negotiations are based on historical loss ratios. It should be noted the award amount is an estimate based on historical use which fluctuates based on enrollment and services provided.											

Award #3 Supporting Documents 01/29/2026

4	Rescind	1411453446 Integrated Program Management and Execution for the Small Diameter Pipe Replacement Program	Vu	N/A	Capital	N/A	N/A	N/A	N/A	N/A	N/A	N
	Advertised: 10/11/2023 Opened: 12/05/2023 Three (3) Proposals Received Public Evaluation Meeting: 12/19/2023 For additional information contact: Darriel Brown											
	The scope of this request entailed program management for extensive sewer and water distribution networks, including over 200 miles of aging galvanized water mains that frequently experience breaks and leaks. The program management would have included developing a data-driven capital improvement plan for the prioritization of rehabilitation and replacement of mains and assisting JEA in developing design guidelines and Standards, with an outcome of creating a five-year forecast of task orders and projects to be completed.											
	This request has been rescinded because JEA is revising its approach to managing the Small Diameter Pipe Replacement Program..											
5	Invitation For Bid	1411867048 (IFB) JEA Electric Plant Industrial Cleaning Services	Erixton	THOMPSON INDUSTRIAL SERVICES, LLC Vecta Environmental Services LLC	O&M	\$5,351,999.00	\$4,933,775.50 \$244,131.45	N/A	\$4,933,775.50 \$244,131.45	N/A	Three (3) Years w/Two (2) Optional One (1) Year Renewals	N
	Moved to regular agenda as award item number 6											
6	Rescind	1411836846 (RFP) N01 Isolated Phase Bus System Overhaul	Erixton	N/A	O&M	N/A	N/A	N/A	N/A	N/A	N/A	0
	Advertised: 09/09/2024 Opened: 10/22/2024 Two (2) Responses Received For additional information contact: Jason Behr											
	This scope of work includes inspecting, cleaning, restoring grounds, documenting materials and measurements and electrically testing the Isolated Phase Bus (IPB) system between the Generator Terminals and the step-up power transformers.											
	This rescind is due to budgetary constraints related to the NO3 Unit discovery at Northside Generating Station. JEA's plan at this time to re-bid this service towards the end of FY25 for another scheduled outage in FY26.											
7	Contract Increase	4511 Spring Park Rd Pump Station Rehab and Upgrade	Melendez	United Rentals	Capital	\$200,000.00	\$200,000.00	\$1,015,422.32	\$1,215,422.32	N/A	Project Completion Start: 07/25/2023 End: 01/30/2025 (Estimated)	N
	Last awarded: 10/03/2024 For additional information contact: Dan Kruck											
	The scope of work for this contract includes providing bypass pumping for the Spring Park pump station while the station is undergoing a complete rehabilitation. Originally, this work was contracted to Williams Industrial Services (WIS), as part of the overall pump station rehabilitation project. WIS subsequently declared bankruptcy in July 2023. JEA terminated the contract and took over the responsibilities of paying for the bypass pumping to ensure continuation of customer service in the area. Additional contract funding is required to pay for the bypass and demobilization costs until construction is completed. JEA anticipates the pump station to be removed off bypass in January of 2025. If the pump station is removed earlier than anticipated, the funds will not be encumbered. The bypass costs have remained consistent throughout the contract period.											

Consent Agenda Action												
Committee Members in Attendance	Names	Ted Phillips, Jody Brooks, Hai Vu										
Motion by:	Jody Brooks											
Second By:	Hai Hu											
Committee Decision	Move award item #5 of the consent agenda to the regular agenda as item #6 for discussion. Approve items 1-4; 6 and 7											
Regular Agenda												
Award #	Type of Award	Solicitation # & Short Description/Title	VP	Awardee	Award Amount	Business Unit Estimate	Original Award Amount	New Not-to-Exceed	Amendments	Term	JSEB Participation (Y/N) If Y, then list company name(s) (% , \$ - awarded)	Action
1	Contract Termination	1411001246 Licensing, Implementation, and Support of a Utility Consumption Tracker Solution	Pressley	Utility Consumer Analytics, Inc	N/A	N/A	\$1,997,250.00	N/A	N/A	Five (5) Years w/ One (1) - 1 Yr. Renewal Start: 10/01/2023 End: 09/30/2028	N	Motion by: Jody Brooks
	For Additional Information Contact: Angel Iosua JEA has requested to terminate for convenience the contract with Utility Consumer Analytics (UCA) dba Silverblaze to upgrade and enhance its Utility Consumption Tracker product to its new ACE Platform. Upon a current detailed pricing review with the vendor and internal cost analysis, JEA determined the cost for this endeavor would be higher than the available funding, and with ongoing licensing costs deemed unsustainable. JEA is currently discerning more cost-effective alternatives to provide comparable functionalities to customers as originally proposed for this project. Note, no costs have been incurred on this project. The existing Utility Consumption tracker product contract is being extended in subsequent award to cover the transition period to a JEA in house solution. The original award is attached as backup.											Second by: Hai Vu
	DISCUSSION/ACTION: Ted Phillips, Nathan Woyak DISCUSSION/ACTION PARTICIPANTS: Is award item 1 and 2 relatively similar in terminating award 1 and extending award 2 to the same company. The contract termination was for a new product project that never got off the ground due to budget and current project resources. It was bid originally in 2023 for the supplier to implement their new product ACE, which we are no longer moving forward.											Committee Decision: Approved
2	Contract Extension	Utility Tracker Portal	Pressley	Utility Consumer Analytics, Inc	\$58,648.47	\$1,800,000.00	\$260,984.34	\$1,150,606.95	05/21/2021-\$260,984.34 05/26/2022-\$274,033.56 04/20/2023-\$295,956.24	One (1) Year w/Two (2)-One (1) Yr. Renewals☐	N	Motion by: Hai Vu
	For Additional Information Contact: Angel Iosua The JEA Customer Energy and Water Management Portal empowers JEA customers by providing them with an online tool on jea.com, My Utility Tracker, to better manage their energy and water costs. This portal helps customers understand their usage patterns and offers valuable insights to improve the energy efficiency of their homes or businesses. This request is for a one (1) year contract extension from 7/1/2024 to 6/30/2025 and for \$58,648.47 in additional funds to support the existing product. Pricing remains fixed. JEA already has most of the funds to cover this extension availabe on the contract however is short on covering the final quarterly payment. JEA awarded a new project contract to Utility Consumer Analytics, Inc. for their new ACE platform in 2023 however due to budget cuts and Technology project resource constraints, JEA has decided not to move forward with this new project and will terminate that contract for convenience explained in the previous award. OGC requested this less than 10% increase extension be approved at awards committee for transparency along with the new contract termination. The JEA Business Unit and JEA technology services plan to create a new in-house replacement solution by the end of this contract on 6/30/2025. In the event that the implementation of the new in-house solution is delayed, Utility Consumer Analytics, Inc. has agreed to provide month-to-month coverage to ensure continuous service while the new solution is being finalized.											Second by: Jody Brooks
	DISCUSSION/ACTION: Ted Phillips, Nathan Woyak, Hai Vu DISCUSSION/ACTION PARTICIPANTS: The extension goes from July to June, should part of this also be a ratification? Secondly, why is the award amount so small, for only about \$58,000. The reason for the extension is to allow JEA to utilize the exsisting resources thru June. The award amount is small due to the fact that it is only requesting funds for the last quarter of the current contract. We previously had the funds that were already existing on the contract to cover us three 3/4 of the year.											Committee Decision: Approved

Award #3 Supporting Documents 01/29/2026

3	Single Source	SSP Mobile Information Management System (MIMS) 5.2 Implementation and Maintenance Support	Selders	SSP Innovations, LLC	Project Completion-\$352,010.00 Annual Term License & Maintenance Agreement (5 yrs)-\$250,000.00	\$585,000.00	N/A	\$602,010.00	N/A	Project Completion Start: 01/01/2025 End: 07/31/2025 Annual term License & Maintenance Term: Start Date: 10/1/2025 End Date: 09/30/2030	N	Motion by: Hai Vu																		
	For Additional Information Contact: Angel Iosua This Single-Source request for a total amount of \$602,010.00 which includes \$352,010.00 for Project Mobilization implementation estimated to be completed from January 2025 through July 2025 and for fixed fee of \$250,000.00 for Maintenance and Support from 10/01/25-09/30/2030. JEA's existing Technology Standard Go! Sync Mobile GIS solution is outdated and recently had the technical support discontinued. Currently, Go! Sync is installed on approximately 350 laptops throughout the JEA organization across multiple departments and serves as our primary mobile Geographic Information System (GIS) solution. SSP is replacing their Go! Sync Mobile GIS solution with Mobile Information Management System (MIMS). JEA requires the upgrade to MIMS as a modernized solution to deliver Geographic Information System (GIS) data and mapping functionality to our mobile workforce. As the business is currently upgrading the outage management system, the successor mobile GIS solution must also integrate with the new outage management field solution, OG Field, provided by CGI. SSP Innovations, with its comprehensive understanding of both the current and future CGI outage management systems, is well-positioned to provide the necessary integration of MIMS with the upcoming OG Field mobile FMS application. Beyond the common mapping functions offered by most mobile GIS applications, such as map navigation, feature identification, routing, and search, there are other critical business functional requirements that only MIMS provided by SSP Innovations, Inc. can satisfy: 1. Patrol Inspections: The user can drive down the street, and the app automatically documents the inspection status of assets passed. 2. Water, Wastewater, Chilled, and Reclaimed Tracing: Essential for managing and maintaining these specific utility systems. The single justification is due to MIMS being the only justifiable solution on the market that meets all of JEA's requirements. Due Diligence was completed on reviewing other public pricing and JEA is receiving a lower implementation cost from SSP than another public contract reviewed and equal maintenance cost. The MIMS product from SSP Innovations stands out as the best solution for our mobile GIS needs, given its ability to integrate seamlessly with our upgraded outage management systems and its alignment with our essential business requirements. These functionalities are crucial for JEA's operations and highlight why the MIMS product from SSP Innovations is the best fit for our needs.																													
	DISCUSSION/ACTION: Ted Phillips, Nathan Woyak, Hai Vu, Greg Turner DISCUSSION/ACTION PARTICIPANTS: What is the reason that this is a single source, as well as the reason in the two amounts mentioned? SSP Innovations is the only supplier that meets all the requirements for this project. SSP Innovations has the compatibility to run the current process and when it is time to do the upgrade it will just go in sync. The reason for the difference is that the first one is the capital project implementation and the other amount is to include the ongoing maintenance.																													
4	Intent to Negotiate (ITN)	1411825848 Wet Well and Process Tank Cleaning and Hauling Services	Vu	Wind River Environmental, LLC	\$4,707,300.00	N/A	N/A	\$4,707,300.00	N/A	Five (5) Years w/Two (2) Optional 1 Yr Renewals Start: 01/01/2025 End: 12/31/2030	N	Motion by: Hai Vu																		
	Advertised: 08/13/2024 Opened: 10/22/2024 Three (3) Proposals Received <table><tr><td>Company</td><td>Rank</td><td>Score</td><td>BAFO Bid Total</td></tr><tr><td>Wind River Environmental, LLC</td><td>1</td><td>278.47</td><td>\$4,707,300.00</td></tr><tr><td>EnviroWaste Services Group, Inc.</td><td>2</td><td>217.48</td><td>\$9,375,695.00</td></tr><tr><td>U.S. Submergent Technologies</td><td>3</td><td>75.56</td><td>\$27,109.750.00</td></tr></table> For additional information contact: Darriel Brown The scope of this contract is to provide industrial cleaning services to remove and dispose of sand, grit, grease, and other entrained debris from various Class I, II, III influent pump station wet wells and other entrained debris from various Process Tanks at Water Reclamation Facilities, and Class IV Lift Stations at the lowest cost to JEA. This service was previously solicited as an Invitation for Bid and was rescinded by approval of the Awards Committee on 07/11/2024 due to significant variations in the responses, indicating respondents were not clear on the expectations for the solicitation. JEA communicated the plan to rebid this service as an Invitation to Negotiate (ITN) to allow for vendor clarification as needed during the evaluation and negotiation phases of the ITN. The current ITN involved the evaluation of various criteria including pricing, past performance, equipment list, organizational structure, and work plan. The evaluation results determined Wind River Environmental to be the highest ranked respondent. These services were previously divided into two contracts and Wind River Environmental is the incumbent for both. For this new contract, cumulative pricing is increasing by about 14% from the current pricing established in September 2022. The BAFO process resulted in a price reduction of \$146,375.00, or 3.1% over 5 years. The current contract will allow for CPI price adjustments going forward.											Company	Rank	Score	BAFO Bid Total	Wind River Environmental, LLC	1	278.47	\$4,707,300.00	EnviroWaste Services Group, Inc.	2	217.48	\$9,375,695.00	U.S. Submergent Technologies	3	75.56	\$27,109.750.00			
	Company	Rank	Score	BAFO Bid Total																										
Wind River Environmental, LLC	1	278.47	\$4,707,300.00																											
EnviroWaste Services Group, Inc.	2	217.48	\$9,375,695.00																											
U.S. Submergent Technologies	3	75.56	\$27,109.750.00																											
DISCUSSION/ACTION: Ted Phillips, Darriel Brown, Jody Brooks, Hai Vu DISCUSSION/ACTION PARTICIPANTS: What is the reason on such a big difference in the prices, is this company able to handle this size workload? This ITN was multiple contracts that were consolidated into 1 that could still result into multiple contracts. The price for the lowest bidder is about a 14% increase from the current pricing that we have. This was a ITN Solicitation to give the opportunity for moer negotiations, engagement and questions to be asked. Some of the differences in pricing was also that one is local supplier and there resources are here. The current supplier is going a good job for us even though there is a 14% price increase from the current price but we are satisfied with their workforce product.																														

Award #3 Supporting Documents 01/29/2026

5	Single Source	NGS - N01/N02/N03 Replacement of DCS Servers, Clients and Switches	Melendez	ABB INC	\$667,680.00	\$5,351,999.00	N/A	\$667,680.00	N/A	Project Completion Start Date: 12/12/2024 End Date: 03/01/2026	N	Motion by: Hai Vu
	Single Source For additional information contact: Jason Behr ABB is the OEM for the distributed control system on Northside units 1, 2 and 3. ABB has recommended reconfiguring JEA network and server configuration to support virtualization to resolve issues that were experienced after upgrading to the most recent version of ABB HMI software. Prior to 2015, JEA utilized ABB process portal B (PPB) for many years as the HMI software for the NGS steam units. PPB operated on Windows XP but ABB informed us that PPB would not be migrated to newer versions of windows and that we would need to migrate to their S+ software for our HMI systems. The new version of S+ has been tested on virtual servers that are placed on host physical servers. This is the direction that the industry has been moving towards for some time now as it improves system reliability. Virtualized servers are the recommended configuration for the new S+ software. In addition to virtualizing the servers, the clients, which are also at end of life and due for replacement, will be virtualized and replaced utilizing thin clients which are more cost effective and which can also be restored more quickly than traditional clients in the event of a hardware failure. For this project, ABB will be upgrading our systems to the most recent version of S+ software and virtualizing our servers and operating workstations. ABB will be providing software engineering and installation support as well as recommendations for hardware and network configurations. ABB will install all hardware tied directly to the S+ controls software.											Second by: Jody Brooks
	DISCUSSION/ACTION: Ted Phillips, David Biruk, Amar Pekusic, Jody Brooks DISCUSSION/ACTION PARTICIPANTS: Why is this award a single source? We are upgrading the current version of the software to the latest version for the distributed control system; at the same time we are updating and replacing our servers that are getting closer to the end of life. This is to update our network with a little bit of network reconfiguration that is required in the new version of this software.											Committee Decision: Approved
6	Invitation For Bid	1411867048 (IFB) JEA Electric Plant Industrial Cleaning Services	Erixton	"THOMPSON INDUSTRIAL SERVICES, LLC Vecta Environmental Services LLC"	O&M	\$5,351,999.00	"\$4,933,775.50 \$244,131.45"	N/A	"\$4,933,775.50 \$244,131.45"	N/A	Three (3) Years w/Two (2) Optional One (1) Year Renewals	Motion by: Jody Brooks
	Advertised: 11/04/2024 Opened: 11/19/2024 Three (3) Bids Received For additional information contact: Jason Behr The Scope of Work includes furnishing all supervision, labor, materials, tools, equipment, consumables, and subcontracts necessary for industrial cleaning services at JEA electric generating facilities. Services shall include, but not be limited to, the following: • Wet & Dry Vacuuming Services • Hydroblasting & Ultra High Pressure (UHP) Cleaning Services • Chemical Cleaning Services (pricing will be requested on a per project basis). • High Volume Pump Services • Fugitive Dust Control Services This solicitation was split into two services. The first service is for full time personnel services to provide routine cleaning services at Northside Generating Station. The second service is to provide cleaning services during scheduled outages at Northside Generating Station, Brandy Branch Generating Station, Kennedy Generating Station, and Greenland Energy Center. Thompson Industrial Services is the lowest bidder and is being awarded the daily services and a majority of the outage services. Vecta Environmental Services is being awarded a portion of the outage services to ensure availability of services during critical outage timelines. The overall award amount is lower than the business unit estimate and the overall rates are in line with previous rates and deemed reasonable.											Second by: Hai Vu
	DISCUSSION/ACTION: Hai Vu, Jason Behr DISCUSSION/ACTION PARTICIPANTS: Why was this such a short bidding period it was advertised on the 4th and set to open on the 19th? The reason for the short period is due to the fact that the current contract is expiring in January and they wanted to get this done before the holidays. There were no issues nor protest, in having this item advetised for the short period of time. It was discussed in the prebid that if they needed more time they could request an extension and no one had an issue. The bid workbook was pretty self-explanatory as far as rates go so none of the bidders expressed any issues.											Committee Decision: Approved
Consent and Regular Agenda Signatures												
Budget	Name/Title	Stephanie M Nealy										
Awards Chairman	Name/Title	Theodore B Phillips										
Procurement	Name/Title	JGM										
Legal	Name/Title	Rebecca Lavis										



1-9-26

JEA
225 N. Pearl Street
Jacksonville, Florida 32202
Amar Pekusic
Staff Engineer -Project Management
JEA Electric Production Project Management

Subject: Unit 2 & Unit 3 Client additions
Reference: 1-8-26 .S Lukata email request

Dear Amar,

The purpose of this letter is to provide a quotation for addition Client licenses for Unit 2 and Unit 3. The following is pricing:

Unit 2

Qty	Part No	Description	List
1	8VZZ000842L0670	ADD 1 DEVELOPER CLIENT PACKAGE	\$ 10,198

Unit 3

Qty	Part No	Description	List
1	8VZZ000842L0670	ADD 1 DEVELOPER CLIENT PACKAGE	\$ 10,198

Lead time on licenses is 2-3 weeks. The price to correct these is **\$20,396**. ABB will proceed upon approval from JEA. Please contact me if you have any questions.

The Terms and Conditions of this proposal number are based the Contract between JEA and ABB Inc., JEA Contract # JEA 12249 dated January 10, 2026. No other terms and conditions shall apply. Where there is a conflict between the Terms and Conditions and this proposal, terms of this proposal shall take precedence.

Sincerely,

Jeffrey Robbins

Jeffrey Robbins
Sr. Project Manager
Power Generation
ABB Industrial Automation.
Phone: (440) 585-7507

Cc: T. Cross

ABB Inc.



CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: College Street Switchgear Replacement BMCD Project No. 188156
 Client: JEA Client Project No. 8008424
 Engineer: Burns & McDonnell Contract No. 12038

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

The purpose of this Change Order is to hereby extend Burns & McDonnell's Project Management Services for Project #8008424, per the scope of services outlined in the College Street Switchgear Replacement Project Management Services proposal dated June 27, 2025, and defined under Master Contract #12038. The period of performance shall be from October 1, 2025, through September 30, 2026 (FY2026).

SCOPE – COLLEGE STREET PROJECT MANAGEMENT SERVICES ESTIMATE	HOURS	FEE
Project Management	379	\$96,828.75
Project Controls	158	\$19,615.21
Travel and Expenses	N/A	\$2,653.00
Total FY2026 Proposal	\$119,096.96	
Balance Forward		(\$39,74.22)
TOTAL CHANGE ORDER VALUE:	\$79,302.66	

As a result of the modification(s) described above:

The revised **Contract Price** is:

Original Contract Price.....\$ 54,900.00
 Total net amount of all previous Change Orders (+ or -) \$ 0
 Total net amount of all previous variable quantity adjustments (+ or -) \$ 0
 Total net amount of this Change Order (+ or -) \$ 79,302.66
 Current Contract Price, including this Change Order \$ 134,202.66

The revised **Contract Time** is:

	Substantial Completion	Ready for Final Payment
Original Completion Date(s)	<u>9/30/25</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders (+ or -)	<u>N/A</u>	<u>N/A</u>
Total net time adjustment* of this Change Order (+ or -)	<u>365</u>	<u>N/A</u>
* Time adjustment is specified in: ☐ Working Days ☒ Calendar Days ☐ Other <u>N/A</u>		
Current Completion Date(s), including this Change Order	<u>9/30/26</u>	<u>N/A</u>

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.



01-05-15 Form CO-1

This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By Darrell Hamilton

By Randolph Koncelik

Date _____

Date _____

DRAFT



PROPOSAL FOR
26kV Feeder Circuit Breaker Replacement
Project Management Services

Contract # JEA12038

SUBMITTED TO
JEA

October 9, 2025



October 9, 2025

Mr. Darrell Hamilton
Manager, Transmission & Substation Projects
JEA
225 North Pearl Street
Jacksonville, FL 32202

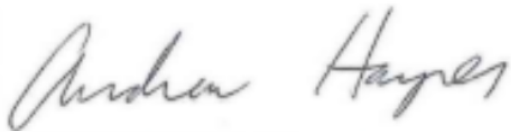
RE: 26KV Feeder Circuit Breaker Replacement Project; FY2026

Dear Mr. Hamilton,

On behalf of Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell), thank you for this opportunity to provide a proposal to extend project management services for the 26kV Feeder Circuit Breaker Replacement Program for fiscal year 2026. This proposal outlines the scope of the Services we will undertake in support of this project in its entirety.

We are prepared to start work on this exciting project immediately upon your approval. If you have any questions or would like to discuss further, please feel free to reach out to Randy Koncelik at (551) 404-8393.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Harper".

Andrew Harper, PE
Regional Practice Manager, Florida
Transmission & Distribution Services
aharper@burnsmcd.com

A handwritten signature in black ink, appearing to read "Randy Koncelik".

Randy Koncelik, PMP
Project Manager, Account Manager
Transmission & Distribution Services
rjkoncelik@burnsmcd.com

Cc: Sebastian Chmist, JEA Electric Systems Engineer

1.0 Project Description

JEA has engaged Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) to provide project management services for the 26kV Feeder Circuit Breaker Replacement Program. This initiative involves the replacement of one hundred sixty-seven (167) 26kV feeder breakers currently in service across JEA's substation network, of which (45) still need to be replaced; with at least (17) in the forecast for FY2026. These breakers, which are either obsolete, exhibit high failure rates, incur elevated maintenance costs, or lack vacuum interrupter technology, have been identified by JEA Substation Maintenance for systematic replacement. The project is currently in the implementation phase with 20 design packages left to issue for construction.

This proposal outlines the cost and execution strategy for Burns & McDonnell to manage the 26kV Feeder Circuit Breaker Replacement Program for JEA. Burns & McDonnell will support this effort by delivering project management services as more fully described herein. These services will be executed for the balance of the Fiscal Year 2026 (FY26), which ends on September 30, 2026. Continuation of services can be provided in a separate proposal for FY 27 and 2028.

2.0 Project Management Services Scope of Services

Burns & McDonnell will provide project management services for the 26kV Feeder Circuit Breaker Replacement Program, with a focus on engineering alignment, schedule integration, stakeholder engagement, and monitoring of project risk. Specific services include:

- Developing and maintaining a fully integrated project schedule with monthly updates;
- Manage design activities performed by Leidos (The EOR) until completion;
- Update the schedule of values for each design package;
- Obtain quotes from Reliable Substation Services (The Unit Price Contractor assigned);
- Lead project meetings to facilitate issue resolution;
- Lead resolution of RFI 's and technical inquiries with the EOR;
- Identifying and tracking critical path activities and interdependencies;
- Obtain input from JEA stakeholders on potential project risks and document in a project specific risk register;
- Managing JEA purchase orders (POs) and invoices for the project;
- Schedule the issuance of material from the JEA Storeroom in support of the project requirements and overseeing the development of material forecasts;
- Initiating and scheduling outages for the project as required;
- Initiating the process for JEA to issue construction and material procurement purchase orders as required to support the project requirements;
- Schedule and lead a pre-construction turnover meeting with JEA's Substation O&M, and System Protection and Controls O&M team, **as well as the contractor.**
- Obtain input from JEA Substation O&M and Protection & Controls to align milestones and reporting;
- Monitor the project budget and cash flow and provide monthly updates via the Project Update Form (PUF);
- Develop trend documentation for JEA to reallocate funds between fiscal years as required;
- Lead internal team meetings and attend monthly stakeholder sessions; and
- Manage the transmission of as-built documentation to the EOR following construction completion
- **Perform a post-construction walkdown prior to the energization of the breaker.**

3.0 Project Management Approach

Burns & McDonnell's project management approach for the 26kV Feeder Circuit Breaker Replacement Program is built around a collaborative delivery model designed to align all project stakeholders, namely JEA internal teams, the EOR and the construction teams under a unified project vision for a successful project completion.

Our approach emphasizes coordination with integrated planning, and transparent communication across organizational boundaries. We will lead the development and maintenance of a project schedule, which will incorporate key milestone

Award #4 Supporting Documents 01/29/2026

activities from all parties and reflect dependencies across permitting, engineering, procurement, outages, and construction. Our Team will work closely with each stakeholder to validate timelines, identify potential conflicts, and maintain schedule integrity throughout the project lifecycle. In addition, we will facilitate bi-monthly meetings to track progress and implement timely corrective actions. Meeting outputs, including action item lists and schedule updates, will be documented and distributed to all participants for transparency and accountability.

To achieve these goals, the following meetings will be incorporated into Burns & McDonnell's project management plan to facilitate clear communication, issue resolution, risk analysis and mitigation, progress tracking, and communication among all stakeholders:

Initial Project Kickoff Meeting

An initial kickoff meeting will be held upon project award to align expectations, exchange relevant information, and establish the project plan. Agenda items will include:

- Review of completed work and upcoming objectives;
- Clarification of roles, responsibilities, and communication protocols;
- Identification of key project stakeholders;
- Review of the project scope, milestones, and key risks; and
- Discussion of outstanding documentation or data needs

Project Status Meetings

Burns & McDonnell will lead bi-monthly one-hour remote progress meetings with the JEA project team. These meetings will be used to track milestones, review open action items, and discuss project risks.

Burns & McDonnell has budgeted additional hours per month to accommodate ad hoc coordination calls throughout the proposed project duration.

Pre-Construction Meeting

Burns & McDonnell will schedule and lead a pre-construction meeting onsite with the JEA project team to review scope, scheduling, and outage requirements before construction begins. Burns & McDonnell attendance for this meeting will include the Project Manager.

4.0 Project Management Services Deliverables

Burns & McDonnell will develop a detailed project plan for alignment of engineering, procurement, and construction schedules, including the following:

- Integrated project schedule (updated monthly)
- Cash flow analysis (updated monthly)
- Compile project risks as identified by project stakeholders (updated monthly)
- Monthly progress reports
- Project Update Form (PUF) (updated monthly)
- Project action item log (updated monthly)

5.0 Project Estimate – Project Management

The estimated cost for the project management services for FY26 described herein is illustrated in the table below:

SCOPE – 26KV FEEDER CIRCUIT BREAKER PROJECT MANAGEMENT SERVICES ESTIMATE		HOURS	FEE
Project Management		425	\$108,365
Project Controls		171	\$21,250
Travel and Expenses			\$2,653
TOTAL FEE:		\$132,267	

Note: Estimated fee is based on the information available and subject to change based on the needs of the project. Funding may be adjusted between disciplines as needed, but overall funding will not exceed the Total Fee of \$132,267 without a mutually agreeable change order.

7.0 Assumptions, Clarifications and Exceptions

1. This proposal outlines the scope of the Services Burns & McDonnell will undertake in support of this project in its entirety. Any alterations, additions, or deletions to the scope of the Services would be executed with a mutually agreeable change order.
2. The not-to-exceed price is not a guaranteed maximum price and Burns & McDonnell has no obligation to complete any work in excess of the Total Fee without written approval of additional funds from JEA.
3. The project estimate was developed based on providing resources up to the end of the 2026 Fiscal Year, which is September 30, 2026.
4. JEA will provide required access to internal systems and documentation, including Project Update Forms (PUFs) and Project Scope Statements (PSSs).
5. Burns & McDonnell is not being engaged to serve as construction oversight or to provide construction inspection services in connection with these Services. **Burns & McDonnell will coordinate with JEA's Separate Contractors to coordinate the resolution of construction issues as they arise and may participate in walkdowns to observe progress and verify project scope elements. Such observations do not constitute inspection, approval, or acceptance of the Contractor's work, which remains the responsibility of the JEA.**
6. Burns & McDonnell is directed to rely upon information provided by or through the JEA and/or EOR, without independent verification.
7. Burns & McDonnell will provide owner's representative services for the Project, for which Burns & McDonnell shall function as JEA's limited agent by providing administrative services and to assist in the management of information, planning, scheduling, estimating, forecasting, and assist in an advising role to JEA to attempt to expedite and seek cooperation among JEA's separate engineers, contractors, vendors, and agents (collectively, "Separate Contractors"), and other third parties that impact, exercise control over, or have legal, regulatory, or permitting jurisdiction involving the Project or its participants.
8. In Burns & McDonnell's role as a limited agent of JEA, Burns & McDonnell shall have no authority to bind JEA for the payment of any costs or expenses.
9. Burns & McDonnell will bring, utilize, and develop Burns & McDonnell's licensed or otherwise owned proprietary management systems, and other tools and know-how in the performance of the services undertaken.

Award #4 Supporting Documents 01/29/2026

10. Original information provided by or through JEA to Burns & McDonnell in support of the Project, shall be the property of JEA.
11. The roles, obligations, and liabilities of JEA's Separate Contractors and others under separate agreements with JEA remain solely with those parties.
12. When monitoring any construction progress on the Project site, it is expressly understood that Burns & McDonnell's sole responsibility will be to JEA to observe and report progress of the Project.
13. Burns & McDonnell does not guarantee the performance of or warrant the work, work product, or materials of any of JEA's Separate Contractors, or the performance or actions of any third parties impacting, exercising control over, or that have legal, regulatory, permitting, or other jurisdiction involving the Project or its participants.
14. JEA shall waive and release, and otherwise indemnify, defend, and hold harmless Burns & McDonnell from any claims, losses, damages, or liabilities arising out of engineering, procured equipment, or construction undertaken by JEA or JEA's Separate Contractors during and after the completion of Burns & McDonnell's Services.
15. When Burns & McDonnell performs Services at a Project site, it will follow JEA's requirements for site safety as applicable to the scope of services, including complying with the safety plan of JEA's applicable construction contractor at the site. Burns & McDonnell will also implement its own safety program for its employees and subconsultants performing services on the Project site, and will be responsible for training, monitoring, correcting, and reporting safety-related incidents involving Burns & McDonnell's employees and subconsultants. However, under all circumstances, JEA's construction contractor(s) will be directing the physical work and will be responsible for overall safety of the work site.
16. In Burns & McDonnell's role as a limited agent of JEA in the field, Burns & McDonnell shall have no right to stop the work of Owner's Separate Contractors; provided, however, that Burns & McDonnell shall have the authority to direct Separate Contractors to stop work in the limited circumstance in which Burns & McDonnell observes an emergency affecting the safety of persons, the Project, or adjacent property, or the violation of JEA's site safety program that, in the reasonable judgment of Burns & McDonnell, poses a risk of injury or death.



495 North Keller Road
Suite 300
Maitland, FL 32751
burnsmcd.com



PROPOSAL FOR
College Street Substation Network Reconfiguration
Project Management Services

Contract # JEA12038

SUBMITTED TO
JEA

January 5th, 2026



January 5, 2025

Mr. Darrell Hamilton
Manager, Transmission & Substation Projects
JEA
225 North Pearl Street
Jacksonville, FL 32202

RE: College Street Network Reconfiguration (T3) Project; FY2026

Dear Mr. Hamilton,

On behalf of Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell), thank you for this opportunity to provide a proposal to extend project management services for the College Street Reconfiguration (T3) project for fiscal year 2026. This proposal outlines the scope of the Services we will undertake in support of this project in its entirety.

We are prepared to start work on this exciting project immediately upon your approval. If you have any questions or would like to discuss further, please feel free to reach out to Randy Koncelik at (551) 404-8393.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Koncelik", with a stylized flourish at the end.

Andrew Harper, PE
Regional Practice Manager, Florida
Transmission & Distribution Services
aharper@burnsmcd.com

Randy Koncelik, PMP
Project Manager, Account Manager
Transmission & Distribution Services
rjkoncelik@burnsmcd.com

Cc: Sebastian Chmist, JEA Electric Systems Engineer

1.0 Project Description

JEA has requested Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) to provide a proposal for project management services for the College Street Network Substation Reconfiguration (T3) Project. This initiative involves the upgrade of (2) transformers, T1 and T2; and the addition of a third transformer, T3. Due to the ongoing supply chain issues, new substation transformers are taking more than 3 years to order, manufacture, and deliver to JEA. This project is to allow for the timely ordering of new T1, T2, & T3 transformers, and 69kV circuit breakers for installation at the College St substation. The root need for this upgrade is driven by the expansion of the downtown area load.

This proposal outlines the cost and execution strategy for Burns & McDonnell to manage College Street T3 project for JEA. Burns & McDonnell will support this effort by delivering project management services as more fully described herein. These services will be executed for the balance of the Fiscal Year 2026 (FY26), which ends on September 30, 2026. Continuation of services can be provided in a separate proposal for FY 2027 and 2028.

2.0 Project Management Services Scope of Services

Burns & McDonnell will provide project management services for the College Street T3 project, with a focus on engineering alignment, schedule integration, stakeholder engagement, and monitoring of project risk. Specific services include:

- Developing and maintaining a fully integrated project schedule with monthly updates;
- Manage design activities performed the EOR once selected and until completion.
- Manage and work with internal engineers or 3rd party consultants on pre-design activities
- Update the schedule of values for each design package;
- Obtain quotes and support bid efforts;
- Lead project meetings to facilitate issue resolution;
- Lead resolution of RFI 's and technical inquiries with the EOR;
- Identifying and tracking critical path activities and interdependencies;
- Obtain input from JEA stakeholders on potential project risks and document in a project specific risk register;
- Managing JEA purchase orders (POs) and invoices for the project;
- Schedule the issuance of material from the JEA Storeroom in support of the project requirements and overseeing the development of material forecasts;
- Initiating and scheduling outages for the project as required;
- Initiating the process for JEA to issue construction and material procurement purchase orders as required to support the project requirements;
- Schedule and lead a pre-construction turnover meeting with JEA's Substation O&M, and System Protection and Controls O&M team, as well as the contractor.
- Obtain input from JEA Substation O&M and Protection & Controls to align milestones and reporting;
- Monitor the project budget and cash flow and provide monthly updates via the Project Update Form (PUF);
- Develop trend documentation for JEA to reallocate funds between fiscal years as required;
- Lead internal team meetings and attend monthly stakeholder sessions; and
- Manage the transmission of as-built documentation to the EOR following construction completion

3.0 Project Management Approach

Burns & McDonnell's project management approach for the College Street T3 project is built around a collaborative delivery model designed to align all project stakeholders, namely JEA internal teams, the EOR and the construction teams under a unified project vision for a successful project completion.

Our approach emphasizes coordination with integrated planning, and transparent communication across organizational boundaries. We will lead the development and maintenance of a project schedule, which will incorporate key milestone activities from all parties and reflect dependencies across permitting, engineering, procurement, outages, and

Award #4 Supporting Documents 01/29/2026

construction. Our Team will work closely with each stakeholder to validate timelines, identify potential conflicts, and maintain schedule integrity throughout the project lifecycle. In addition, we will facilitate bi-monthly meetings to track progress and implement timely corrective actions. Meeting outputs, including action item lists and schedule updates, will be documented and distributed to all participants for transparency and accountability.

To achieve these goals, the following meetings will be incorporated into Burns & McDonnell's project management plan to facilitate clear communication, issue resolution, risk analysis and mitigation, progress tracking, and communication among all stakeholders:

Initial Project Kickoff Meeting

An initial kickoff meeting will be held upon project award to align expectations, exchange relevant information, and establish the project plan. Agenda items will include:

- Review of completed work and upcoming objectives;
- Clarification of roles, responsibilities, and communication protocols;
- Identification of key project stakeholders;
- Review of the project scope, milestones, and key risks; and
- Discussion of outstanding documentation or data needs

Project Status Meetings

Burns & McDonnell will lead bi-monthly one-hour remote progress meetings with the JEA project team. These meetings will be used to track milestones, review open action items, and discuss project risks.

Burns & McDonnell has budgeted additional hours per month to accommodate ad hoc coordination calls throughout the proposed project duration.

Pre-Construction Meeting

Burns & McDonnell will schedule and lead a pre-construction meeting onsite with the JEA project team to review scope, scheduling, and outage requirements before construction begins. Burns & McDonnell attendance for this meeting will include the Project Manager.

4.0 Project Management Services Deliverables

Burns & McDonnell will develop a detailed project plan for alignment of engineering, procurement, and construction schedules, including the following:

- Integrated project schedule (updated monthly)
- Cash flow analysis (updated monthly)
- Compile project risks as identified by project stakeholders (updated monthly)
- Monthly progress reports
- Project Update Form (PUF) (updated monthly)
- Project action item log (updated monthly)

5.0 Project Estimate – Project Management

The estimated cost for the project management services for FY26 described herein is illustrated in the table below:

SCOPE – COLLEGE STREET NETWORK RECONFIGURATION- PROJECT MANAGEMENT SERVICES ESTIMATE	HOURS	FEE
Project Management	306	\$79,109.24
Project Controls	148	\$18,436.13
Travel and Expenses		\$1,516.00
TOTAL FEE:		\$99,061.37

Note: Estimated fee is based on the information available and subject to change based on the needs of the project. Funding may be adjusted between disciplines as needed, but overall funding will not exceed the Total Fee of \$99,061.37 without a mutually agreeable change order.

7.0 Assumptions, Clarifications and Exceptions

1. This proposal outlines the scope of the Services Burns & McDonnell will undertake in support of this project in its entirety. Any alterations, additions, or deletions to the scope of the Services would be executed with a mutually agreeable change order.
2. The not-to-exceed price is not a guaranteed maximum price and Burns & McDonnell has no obligation to complete any work in excess of the Total Fee without written approval of additional funds from JEA.
3. The project estimate was developed based on providing resources up to the end of the 2026 Fiscal Year, which is September 30, 2026.
4. JEA will provide required access to internal systems and documentation, including Project Update Forms (PUFs) and Project Scope Statements (PSSs).
5. Burns & McDonnell is not being engaged to serve as construction oversight or to provide construction inspection services in connection with these Services. Burns & McDonnell will coordinate with JEA's Separate Contractors to coordinate the resolution of construction issues as they arise and may participate in walkdowns to observe progress and verify project scope elements. Such observations do not constitute inspection, approval, or acceptance of the Contractor's work, which remains the responsibility of the JEA.
6. Burns & McDonnell is directed to rely upon information provided by or through the JEA and/or EOR, without independent verification.
7. Burns & McDonnell will provide owner's representative services for the Project, for which Burns & McDonnell shall function as JEA's limited agent by providing administrative services and to assist in the management of information, planning, scheduling, estimating, forecasting, and assist in an advising role to JEA to attempt to expedite and seek cooperation among JEA's separate engineers, contractors, vendors, and agents (collectively, "Separate Contractors"), and other third parties that impact, exercise control over, or have legal, regulatory, or permitting jurisdiction involving the Project or its participants.
8. In Burns & McDonnell's role as a limited agent of JEA, Burns & McDonnell shall have no authority to bind JEA for the payment of any costs or expenses.
9. Burns & McDonnell will bring, utilize, and develop Burns & McDonnell's licensed or otherwise owned proprietary management systems, and other tools and know-how in the performance of the services undertaken.

Award #4 Supporting Documents 01/29/2026

10. Original information provided by or through JEA to Burns & McDonnell in support of the Project, shall be the property of JEA.
11. The roles, obligations, and liabilities of JEA's Separate Contractors and others under separate agreements with JEA remain solely with those parties.
12. When monitoring any construction progress on the Project site, it is expressly understood that Burns & McDonnell's sole responsibility will be to JEA to observe and report progress of the Project.
13. Burns & McDonnell does not guarantee the performance of or warrant the work, work product, or materials of any of JEA's Separate Contractors, or the performance or actions of any third parties impacting, exercising control over, or that have legal, regulatory, permitting, or other jurisdiction involving the Project or its participants.
14. JEA shall waive and release, and otherwise indemnify, defend, and hold harmless Burns & McDonnell from any claims, losses, damages, or liabilities arising out of engineering, procured equipment, or construction undertaken by JEA or JEA's Separate Contractors during and after the completion of Burns & McDonnell's Services.
15. When Burns & McDonnell performs Services at a Project site, it will follow JEA's requirements for site safety as applicable to the scope of services, including complying with the safety plan of JEA's applicable construction contractor at the site. Burns & McDonnell will also implement its own safety program for its employees and subconsultants performing services on the Project site, and will be responsible for training, monitoring, correcting, and reporting safety-related incidents involving Burns & McDonnell's employees and subconsultants. However, under all circumstances, JEA's construction contractor(s) will be directing the physical work and will be responsible for overall safety of the work site.
16. In Burns & McDonnell's role as a limited agent of JEA in the field, Burns & McDonnell shall have no right to stop the work of Owner's Separate Contractors; provided, however, that Burns & McDonnell shall have the authority to direct Separate Contractors to stop work in the limited circumstance in which Burns & McDonnell observes an emergency affecting the safety of persons, the Project, or adjacent property, or the violation of JEA's site safety program that, in the reasonable judgment of Burns & McDonnell, poses a risk of injury or death.



495 North Keller Road
Suite 300
Maitland, FL 32751
burnsmcd.com



01-05-15 Form CO-1

CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Kennedy 13kV T-11 Addition BMcD Project No. 188505
 Client: JEA Client Project No. 8009085
 Engineer: Burns & McDonnell Contract No. 12038

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

The purpose of this Change Order is to hereby extend Burns & McDonnell's Project Management Services for Project #8009085, per the scope of services outlined in the Kennedy T11 Replacement Project Management Services proposal dated June 27, 2025, and defined under Master Contract #12038. The period of performance shall be from October 1, 2025, through September 30, 2026 (FY2026).

SCOPE – KENNEDY T11 REPLACEMENT PROJECT MANAGEMENT SERVICES ESTIMATE	HOURS	FEE
Project Management	705	\$180,544.88
Project Controls	289	\$35,961.22
Travel and Expenses	N/A	\$2,653.00
Total FY2026 Proposal		\$219,159.09
Balance Forward		(\$37,047.69)
TOTAL CHANGE ORDER VALUE:	\$182,111.47	

As a result of the modification(s) described above:

The revised **Contract Price** is:

Original Contract Price.....\$ 47,450.00
 Total net amount of all previous Change Orders (+ or -) \$ 0
 Total net amount of all previous variable quantity adjustments (+ or -) \$ 0
 Total net amount of this Change Order (+ or -) \$ 182,111.47
 Current Contract Price, including this Change Order \$ 229,561.47

The revised **Contract Time** is:

	Substantial Completion	Ready for Final Payment
Original Completion Date(s).....	<u>9/30/2025</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders (+ or -)	<u>0</u>	<u>N/A</u>
Total net time adjustment* of this Change Order (+ or -)	<u>365</u>	<u>N/A</u>
* Time adjustment is specified in: ☐ Working Days ☒ Calendar Days ☐ Other <u>N/A</u>		
Current Completion Date(s), including this Change Order	<u>9/30/2026</u>	<u>N/A</u>

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.



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This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By Darrell Hamilton

By Randolph Koncelik

Date _____

Date _____

DRAFT



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CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Point Meadows T2 & Circuit Additions BMCD Project No. 188159
 Client: JEA Client Project No. 8008808
 Engineer: Burns & McDonnell Contract No. 12038

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

The purpose of this Change Order is to hereby extend Burns & McDonnell's Project Management Services for Project #8008808, per the scope of services outlined in the Point Meadows Project Management Services proposal dated June 27, 2025, and defined under Master Contract #12038. The period of performance shall be from October 1, 2025, through September 30, 2026 (FY2026).

SCOPE – POINT MEADOWS PROJECT MANAGEMENT SERVICES ESTIMATE	HOURS	FEE
Project Management	579	\$148,268.63
Project Controls	237	\$29,422.82
Travel and Expenses	N/A	\$2,653.00
Total FY2026 Proposal	\$180,344.44	
Balance Forward		(\$32,437.78)
TOTAL CHANGE ORDER VALUE:	\$147,906.75	

As a result of the modification(s) described above:

The revised **Contract Price** is:

Original Contract Price.....\$ 47,450.00
 Total net amount of all previous Change Orders (+ or -) \$ 0
 Total net amount of all previous variable quantity adjustments (+ or -) \$ 0
 Total net amount of this Change Order (+ or -) \$ 147,906.75
 Current Contract Price, including this Change Order \$ 195,356.75

The revised **Contract Time** is:

	Substantial Completion	Ready for Final Payment
Original Completion Date(s).....	<u>9/30/2025</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders (+ or -)	<u>0</u>	<u>N/A</u>
Total net time adjustment* of this Change Order (+ or -)	<u>365</u>	<u>N/A</u>
* Time adjustment is specified in: ☐ Working Days ☒ Calendar Days ☐ Other <u>N/A</u>		
Current Completion Date(s), including this Change Order	<u>9/30/2026</u>	<u>N/A</u>

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.



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This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By Darrell Hamilton

By Randolph Koncelik

Date _____

Date _____

DRAFT



CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: West Jax 230/69kV Substation Reliability BMcD Project No. 184174
 Client: JEA Client Project No. 8008426
 Engineer: Burns & McDonnell Contract No. 12038

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

The purpose of this Change Order is to hereby extend Burns & McDonnell's Project Management Services for Project #8008426, per the scope of services outlined in the West Jax Project Management Services proposal dated May 2, 2025, and as defined under Master Contract #12038. The period of performance shall be from October 1, 2025, through September 30, 2026 (FY2026).

SCOPE – WEST JAX PROJECT MANAGEMENT SERVICES ESTIMATE	HOURS	FEE
Project Management	379	\$96,828.75
Project Controls	158	\$19,615.21
Travel and Expenses	N/A	\$2,653.00
Total FY2026 Proposal	\$119,096.96	
Balance Forward		(\$21,543.71)
TOTAL CHANGE ORDER VALUE:	\$97,553.17	

As a result of the modification(s) described above:

The revised **Contract Price** is:

Original Contract Price.....\$ 43,500.00
 Total net amount of all previous Change Orders (+ or -) \$ 0
 Total net amount of all previous variable quantity adjustments (+ or -) \$ 0
 Total net amount of this Change Order (+ or -) \$ 97,553.17
 Current Contract Price, including this Change Order \$ 141,053.17

The revised **Contract Time** is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	<u>9/30/2025</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders (+ or -) <u>0</u>	<u>0</u>	<u>N/A</u>
Total net time adjustment* of this Change Order (+ or -) <u>365</u>	<u>365</u>	<u>N/A</u>
* Time adjustment is specified in: ☐ Working Days ☒ Calendar Days ☐ Other <u>N/A</u>		
Current Completion Date(s), including this Change Order	<u>9/30/2026</u>	<u>N/A</u>

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.



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This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By Darrell Hamilton

By Randolph Koncelik

Date _____

Date _____

DRAFT



CHANGE ORDER NO. 001
For Contract between Client and Burns & McDonnell

Project Name: 601 Church St. 69kV UG Relocation Project BMCD Project No. 190016
 Client: JEA Client Project No. 8010564
 Engineer: Burns & McDonnell Contract No. 223130

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

Background

As requested by JEA in the kickoff meeting, Burns & McDonnell solicited additional Geotech scope from **Meskel & Associates Engineering, PLLC (MAE)** to include increased bore depths as listed below

Following the bid evaluation process, **Meskel & Associates Engineering, PLLC (MAE)** was selected as the preferred subcontractor. This change order is submitted to request approval for the commencement of **Geotech Investigations** services, including associated site management efforts required to oversee field activities.

Change Order Summary

Cost Item	Amount
Geotech Subcontractor (with markup)	\$26,950.00
Burns & McDonnell Site Management	\$6,523.00
Change Order Amount	\$33,473.00

Scope and Assumptions

Meskel & Associates Engineering, PLLC (MAE) – Approach Overview

The Geotech Investigation scope of services will be executed as follows:

1. Extend depth to 60 feet below ground surface(bgs) from 20 feet bgs on bores B-1 and B-2
2. In addition to previously requested Thermal Resistivity testing on soil samples from bores B-1, B-2 at 5 feet and 8 feet bgs, add thermal resistivity sampling and testing on soil samples from B-2 at depths of 20, 30, 40, 50, 60 feet bgs

The following assumptions apply to each phase of the work. Any deviations from these assumptions or scope changes may result in an additional change order.

Geotech Investigation Assumptions

1. All borings will be Standard Penetration Test (SPT) borings performed continuously to 15 feet and at 5-foot centers thereafter to the boring termination depth.
2. Maintenance-of-Traffic (MOT) will be required at the mentioned boring locations. A lane closure or flagging operation in general accordance with FDOT Standard Plans for MOT will be performed upon approval of a permit to work within the roadway right-of-way.
3. Bulk soil samples will be collected at 20, 30, 40, 50, and 60 feet at bore B-2 for thermal resistivity testing to be performed by GeoTherm. Laboratory index and proctor samples will be collected



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and tested at the MAE laboratory. Split samples will be sent to GeoTherm along with the boring logs and test results for thermal resistivity testing.

4. Due to the depth of the requested thermal resistivity sampling locations, temporary casing and deep flight auger or hollow stem augers will be utilized to collect the soil sample at each depth.
5. Includes all required management and coordination.
6. Permitting for geotech is included, with a one-month estimated approval period.
7. Assumes no weather delays for field work.

As a result of the modification(s) described above:

The revised Contract Price is:

Original Contract Price	\$ 396,583.00
Total net amount of all previous Change Orders	(+ or -) \$ 0.00
Total net amount of all previous variable quantity adjustments	(+ or -) \$ 0.00
Total net amount of this Change Order	(+ or -) \$ 33,473.00
Current Contract Price, including this Change Order	\$ 430,056.00

The revised Contract Time is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	N/A	N/A
Total net time adjustment* of all previous Change Orders(+ or -)	N/A	N/A
Total net time adjustment* of this Change Order	N/A	N/A
* Time adjustment is specified in: ☐ Working Days ☐ Calendar Days ☐ Other _____		
Current Completion Date(s), including this Change Order	N/A	N/A

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.

This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By _____

By _____

Date _____

Date _____



CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Solar PV Forest Trails P&C (PO 227020) BMcD Project No. 179466
 Client: JEA Client Project No. _____
 Engineer: Burns & McDonnell Contract No. JEA19772

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

Scope of Work additions as directed by client which include:

1. The project required re-scoping after initial approval, requiring additional effort and coordination. A detailed review of protection requirements led to a shift to utilizing existing SEL-451 relays from installing new SEL-411L relays, as well as installing customized metering panels. This led to the scope expanded from modifying a single panel to installing two new panels and modifying an existing one. These new installations did not have direct go-bys and will necessitate custom modifications, including APP 601 DAUs, additional current-type terminal blocks, and conversion to a non-CIP, ethernet-based communication medium.
2. The determination that new panels were required introduced additional coordination across multiple disciplines, including substation physical, Telecom, and SPCP. Internal collaboration also expanded to involve System Planning/E98, Relay Settings, NIA for telecom feasibility, and vendor engagement with APP to validate PMU functionality. These efforts represented unplanned resource involvement beyond the original scope. The need for this extensive coordination was not anticipated in the initial proposal, which had only accounted for installing two protection relays.
3. Power Quality Metering (PQM) and Phasor Measurement Units (PMU) were initially excluded from the proposal but later determined to be necessary. The PMU requirements introduced additional complexity, necessitating APP-601 DAU devices on the metering panels rather than relying solely on the line protection panel installations as done at Miller Substation.
4. Revenue metering, initially excluded from the proposal, was later determined to be necessary, requiring two new panels. While the Miller Substation panel provides a design reference, the Dinsmore Substation requirements are more extensive and allow for Ethernet communications. As a result, the Dinsmore panels differ significantly from those at Miller, necessitating customized designs. Because the panels are not identical, careful attention is required to ensure accuracy in their configuration. Additionally, equipment differences have introduced internal rewiring needs, requiring a full point-to-point verification that was not anticipated in the original proposal

As a result of the modification(s) described above:

The revised Contract Price is:

Original Contract Price	\$ 68,844
Total net amount of all previous Change Orders	(+ or -). \$ 0
Total net amount of all previous variable quantity adjustments	(+ or -). \$ 0
Total net amount of this Change Order	(+ or -). \$ 51,250



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Current Contract Price, including this Change Order..... \$ 120,094The revised **Contract Time** is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	<u>N/A</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders(+ or -)	<u>N/A</u>	<u>N/A</u>
Total net time adjustment* of this Change Order.....(+ or -)	<u>0</u>	<u>N/A</u>
* Time adjustment is specified in: ☒ Working Days ☐ Calendar Days ☐ Other	<u>N/A</u>	<u>N/A</u>
Current Completion Date(s), including this Change Order	<u>03/31/2026</u>	<u>N/A</u>

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.

This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By _____

By Randolph Koncelik

Date _____

Date 11/11/2025



CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Georgia Street - Switchgear (PO 226070) BMcD Project No. 177092
 Client: JEA Client Project No. 8009607
 Engineer: Burns & McDonnell Contract No. JEA11972-2025A

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

Scope of Work additions as directed by client which include:

1. Design services for partial demo of southern perimeter concrete wall and installation of one (1) new manual swing gate for access to Albert Street. Two (2) manual swing gates along the western wall will be locked (permanently closed) due to closure of Georgia Street (gates to remain).
2. Design services for the installation of a new drive path from existing automatic gate to the new southern gate and further south to Albert Street. This will include performing a traffic circulation study for station entry/exit and within the substation, providing a section view and material details for drive path construction.
3. Design services for replacing two (2) primary station service transformers (50 & 25kVA padmounts) with two (2) new 100kVA padmount transformers and replacement of two (2) emergency station service transformers (50 & 25kVA padmounts) with two (2) new 100kVA padmounts. Larger transformers are required due to the increase in station load (two additional switchgears and future T3 transformer).
4. Design services to provide specifications for the 15kV station service fuses. With the change in station service transformers size and increase in short-circuit rating (30kA), design services were required for specifying the 15kV fuses for switchgear vendor to procure.
5. Design services for relocation of the 'T1' power transformer installation. A different 'T1' installation location was selected due to the preference for a future proof substation general arrangement.
 - Added redesign of 69kV underground transmission line to 'T1' high-side. Design includes new potheads, cable, ductwork, ampacity calculations.

Description	Adjustments	Notes
Funding Required	\$120,000.00	Per the SOW additions listed above
Scope Adjustments	(\$35,000.00)	Credit, contingency funds allotted in initial project funding
Subcontracts	(\$22,500.00)	Credit, funding allotted for GPR and survey (not used since JEA acquired these activities)
Total	\$63,500.00	Funding required less credits

As a result of the modification(s) described above:

The revised **Contract Price** is:

Original Contract Price \$ 548,992
 Total net amount of all previous Change Orders (+ or -). \$ 0



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Total net amount of all previous variable quantity adjustments (+ or -). \$ 0
 Total net amount of this Change Order (+ or -). \$ 63,500
 Current Contract Price, including this Change Order \$ 612,492

The revised **Contract Time** is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	<u>3/4/2025</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders(+ or -)	<u>N/A</u>	<u>N/A</u>
Total net time adjustment* of this Change Order.....(+ or -)	<u>15</u>	<u>N/A</u>
* Time adjustment is specified in: ☒ Working Days ☐ Calendar Days ☐ Other <u>N/A</u>		
Current Completion Date(s), including this Change Order	<u>3/30/2025</u>	<u>N/A</u>

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This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By Darrell Hamilton

By Randolph Koncelik

Date 11/14/2025

Date 11/14/2025



CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Forest Trail OSP BMCD Project No. 179446
Client: JEA Client Project No. _____
Engineer: Burns & McDonnell Contract No. JEA11972

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

Summary:

The original scope of work was to design nearly 2 miles of UG Fiber line and up to 0.5 miles of OH Fiber line on new distribution poles. However, after further discussion with JEA, the scope of work has been revised to have Burns & McDonnell design 500' of UG Fiber line and 2 miles of OH Fiber line on existing distribution poles with resulting make ready work.

The new UG Fiber design goes from the existing enclosure near the 230KV T-Line structure to the existing 12KV Distribution line where the OH Fiber scope extends from JEA's 230kV line west along Plummer Road to approximately 1,000 feet off the railroad at the dirt path ending where JEA will design a new portion of overhead distribution line for the fiber to continue on.

Additional Meeting Support:

- Two additional Burns & McDonnell resources will be included in the ongoing biweekly Burns & McDonnell and JEA meeting to coordinate the distribution portion.

Scope Additions, Updates and Changes:

- **Fielding & Data Collection**
 - Conduct site visits to gather photos and detailed measurements of distribution poles. All site visits are visual and at ground level.
 - Document existing conditions, clearances, and potential conflicts for attachment planning.
 - Includes one (1) site visit with two (2) site personnel to be completed in five (5) days using an IKGPS fielding device and software.
- **Pole Structure Loading Analysis**
 - Perform structural loading and clearance calculations for existing poles to confirm capacity for new fiber attachments using SPIDAcad pole loading software.
 - Identify any poles requiring reinforcement or replacement.
- **Fiber Make Ready Design**
 - Develop construction drawings and support documentation for fiber attachment installation on the existing distribution pole line.
- **Railroad Permitting**
 - One (1) railroad permit application will be submitted through RailPros' online permit management system for the overhead span crossing over the Norfolk Southern Railway.
- **Preliminary Environmental Review**
 - Burns & McDonnell will do a preliminary review and provide a permitting matrix at the design stage to determine any potential Environmental permits that may be required.
- **Telecom Scope Reduction – Total Reduction of Telecom scope is \$35,600 and is included as a credit to the total increase of this change order**
 - The 1"=100' underground OSP design has been reduced from 2 miles to 500 feet due to the elimination of the Plummer Rd. segment.
 - The remaining OSP underground scope is limited to:
 - Developing a route map and splice detail from the existing handhole/splice enclosure on the 230kV Line 955 ROW (north of Plummer Rd.)



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- Extending to a new handhole/pullbox and riser design on the nearest 12kV distribution pole.
- The original 21 alignment sheets and route map have been reduced to a single alignment sheet.

Additional Assumptions & Clarifications as follows:

- Burns & McDonnell does not guarantee the identification of all existing or potential damages to poles or equipment and shall not be held liable for any damages that are missed, undiscovered, misidentified, latent, concealed, or otherwise undetectable based on conditions observed at the time of the visit.
- JEA has requested that the OH Fiber to be installed as closest to the Neutral and/or Secondary as is allowed by NESC standards within the electrical space.
- If required, all third-party attachment notifications related to the attachment or transfer of existing communications shall be the responsibility of JEA.
- A preliminary environmental review is included in this scope of work, however as design progresses if it is determined that extensive surveys are required along with environmental permitting, this is not captured in this change order.
- All railroad permitting related application fees and third-party fees shall be the responsibility of JEA and no expenses for these fees have been included in this change order.
- Our fee contains no hours for additional construction support for the OH Fiber Make Ready Design.
- Construction prints will be completed in Bluebeam/PDF utilizing snippets from the GIS information provided by JEA. Drawings are not to be to scale per the direction of JEA.
- Others will be responsible to perform the design to cut and splice the ADSS fiber and for the fiber run down the transmission poles 920-126 and 920-125 in order to prepare for the splice to cut in Forest trails.
- JEA to provide an example construction package for our team to utilize. Design, Construction Prints, and bill of materials will be based off of the following provided by JEA.
 - o JEA Electric Master Material Catalog
 - o JEA Electric Rules and Regulations
 - o JEA Overhead Electric Distribution Standards
 - o JEA Electric Transmission Standards
 - o National Electric Safety Code

Additional Deliverables as follows:

- Formatted excel document detailing pole replacements and reframing requirements. SPIDAcad files and reports can be provided as requested.
- Professional Engineer (PE) sealed construction prints detailing the scope of work at each point and span location with work to be performed.
- Bill of materials to be provided as part of the Make Ready design.
- Provide Railroad permits and submittal of permit application.
- Permitting Matrix based on preliminary environmental review.

Schedule*

- Site Visit: NTP + 2 week
- Pole Loading Results Submitted: 4 weeks
- JEA Pole Loading Results Review: 1 week
- Burns & McDonnell to Incorporate comments: 1 week
- Make Ready Design Work Submitted: 5 weeks
- JEA Make Ready Work Review: 1 week
- Incorporate JEA Make Ready Comments and final submittal: 1 week

*Assumes NTP on Oct. 10th, 2025



As a result of the modification(s) described above:

The revised Contract Price is:

Original Contract Price	\$ 74,900
Total net amount of all previous Change Orders	(+ or -) \$ 0
Total net amount of all previous variable quantity adjustments	(+ or -) \$ 0
Total net amount of this Change Order	(+ or -) \$ 56,900
Current Contract Price, including this Change Order.....	\$ 131,800

The revised Contract Time is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	N/A	N/A
Total net time adjustment* of all previous Change Orders(+ or -)	N/A	N/A
Total net time adjustment* of this Change Order.....(+ or -)	N/A	N/A
* Time adjustment is specified in: ☒ Working Days ☐ Calendar Days ☐ Other N/A		
Current Completion Date(s), including this Change Order	1/23/26 (IFC)	N/A

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CLIENT

BURNS & McDONNELL

By Darrell Hamilton

By Randolph Koncelik

Date _____

Date _____



PROPOSAL FOR
College Street Substation – T3 Feasibility Study

Contract # JEA11972

SUBMITTED TO
JEA

November 24, 2025



November 24, 2025

Mr. Darrell Hamilton
Manager, Transmission & Substation Projects
JEA
225 North Pearl Street
Jacksonville, FL 32202

RE: College Street Substation Feasibility Study

Dear Mr. Hamilton,

On behalf of Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell), thank you for this opportunity to provide a Feasibility Study proposal for the College Street Substation. This proposal outlines the scope of the services Burns & McDonnell will undertake in its entirety and the associated estimated cost.

We are prepared to start work immediately upon your approval. If you have any questions or would like to discuss further, please feel free to reach out to Randy Koncelik at (551) 404-8393.

Sincerely,

Andrew Harper, PE
Regional Global Practice Manager
Transmission & Distribution Services
aharper@burnsmcd.com

Randy Koncelik, PMP
JEA Account Manager
Transmission & Distribution Services
rjkoncelik@burnsmcd.com

Cc: Wilbert Aldajuste, JEA Electric Systems Engineer

1.0 Feasibility Study Description

JEA has engaged Burns & McDonnell to provide a feasibility study report that describes and illustrates the work required for the potential ultimate arrangement of adding a third transformer to the College Street Substation. JEA T&D Planning has requested the addition of a third 'T3' transformer and the replacement of the existing 'T1' & 'T2' power transformers, with new 69-13.2kV, 56MVA power transformers. The reconfiguration of the 69kV yard at College Street Substation will tie the substation to the surrounding downtown circuits (connecting to the JEA network) and accommodate a growing demand in the surrounding area. To support the additional transformer bank, JEA planning requires the installation of three (3) additional 69kV breakers within an expanded 69kV substation yard. If Burns & McDonnell determines that the requested project scope is feasible, considering the constraints at the existing substation, Burns & McDonnell will provide a conceptual general arrangement, project scope description and design recommendations for the future 'T3' addition project.

This feasibility study is expected to be executed and completed during FY 2026, which ends September 30, 2026.

2.0 Required Information

Burns & McDonnell has identified key inputs, shown below, to support the completion of the proposed Feasibility Study. These inputs must be supplied by JEA to meet the proposed issuance (completion) date provided in this proposal.

Information Type

1. Site boundary and topographical surveys
2. Geotechnical investigation final report
3. Subsurface investigation report with soft digging verification (potholes)
4. Equipment Ratings for future major equipment
5. Latest revisions of Substation engineering drawings
6. Latest revisions of Transmission line drawings associated with College Street Substation (received)
7. Distribution design package for ongoing project at College Street Substation

3.0 Feasibility Study - Scope of Work

Ground Penetrating Radar and Soft Digs

Burns & McDonnell will contract a third-party to procure Ground Penetrating Radar (GPR). GPR will be performed around the areas of the project's scope of work, inside and outside the substation perimeter walls. GPR is required due to a lack of below grade drawings and information in the areas of project work. Burns & McDonnell also contract a third-party to conduct soft digs, using a non-invasive hydrovac technique around the areas of project work based on the results of the Ground Penetrating Radar.

Conceptual Design Engineering

The proposed Feasibility Study report that will be provided to JEA will include project scope description(s) and drawing(s) of potential ultimate general arrangements and single lines for the College Street Substation. Below is a list of considerations that will be included in the feasibility study report for the future 'T3' addition project.

- Substation yard expansion (to the East, within existing drive path loop)
 - o Expanded walls shall match existing brick wall
 - o Site accessibility for delivering major equipment (69-13.2kV transformers, 69kV breakers)
 - o Electrical and working clearances to new and existing walls
- Installing one (1) new 'T3' 69-13.2 power transformer, with oil containment
- Installing three (3) new 69kV circuit breakers, with associated disconnect switches
 - o Burns & McDonnell to determine feasibility of a ring bus (3 breakers) installation (JEA preference) within expanded substation yard

Award #5 Supporting Documents 01/29/2026

- Installing new 69kV bus-work and connections to existing bus-work, with ampacity considerations
 - o Examine Feasibility of replacing existing lattice box structures and replacing with new bus supports
 - Replacing 69kV 'T1' and 'T2' manually operated high side switches with new motor-operated switches
 - Installing new low-side (13.2kV) connection from 'T3' transformer to 'T3' switchgear within existing South building
 - o Considering options of overhead rigid bus, overhead strain bus and underground cable
- NOTE: Electrical transition into building for 'T3' switchgear connection will be designed by others.
- Existing underground 69kV circuits 661 and 662
 - Existing underground conduits, pull boxes and utilities with existing and expanded substation yard

For the feasibility study considerations listed above, the following disciplines and the associated project scope listed will be included in the final feasibility study report.

1. Substation Physical and Civil/Structural design scope of work, associated costs (ROM estimate), outage requirements and critical long lead items with potential schedule impacts.
2. Protection & Control design scope of work, associated costs (ROM estimate), outage requirements and critical long lead items with potential schedule impacts.
3. Underground transmission line design scope of work, associated costs (ROM estimate), outage requirements and critical long lead items with potential schedule impacts.
4. Telecommunications design scope of work, associated costs (ROM estimate) and critical long lead items with potential schedule impacts.

4.0 Feasibility Study Deliverables

If Burns & McDonnell determines there is a feasible design for the requested project scope, Burns & McDonnell will provide a report with the following deliverables based on the study's Scope of Work:

1. Feasibility Study report includes the following:
 - o Descriptions and analysis of Scope of Work described in Section 3.0
 - o One-line diagram drawing(s) (PDF) for the recommended project scope
 - o General Arrangement drawing(s) (PDF) for the recommended project scope
 - o Class 5 estimates (materials, design & construction) recommended project scope
 - o List of Long Lead Material Items for the recommended project scope
2. Ground Penetrating Radar and Soft Dig Reports with associated surveys drawings and documents.

5.0 Project Estimate – Feasibility Study

The estimated fee for the Feasibility Study work described herein is illustrated in the table below:

COLLEGE STREET SUBSTATION FEASIBILITY STUDY	FEE
Project Management	\$9,000.00
Conceptual Designs	\$66,500.00
Conceptual Estimates	\$25,500.00
Third-Party Survey Activities	\$30,000.00
TOTAL	\$131,000.00

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NOTE: Estimated fee is based on the information available and subject to change based on the needs of the project. Funding may be adjusted between disciplines as needed, but overall funding will not exceed the Total Fee of as shown above without a mutually agreeable change order.

6.0 Assumptions, Clarifications and Exceptions

1. This proposal outlines the scope of the Services Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) will undertake in support of this study in its entirety. Any alterations, additions, or deletions to the scope of the Services would be executed with a mutually agreeable change order.
2. Burns & McDonnell has not included hours for reviewing the building structure and condition for the existing South switchgear building and assumes no responsibility for its integrity.
3. Burns & McDonnell has not included hours for developing any drawings or estimates related to permitting and assumes this will be done by others.
4. Burns & McDonnell has not included hours for developing construction methods, outage coordination, and construction sequences for the recommended Scope of Work described within the study and assumes this is not within the study Scope of Work.
5. Burns & McDonnell assumes that a geotechnical investigation and final report will be completed by others prior to the study's start to support the conceptual designs included in the study's Scope of Work.
6. Burns & McDonnell has not included hours for relays settings conceptual designs or estimates.
7. The not-to-exceed price is not a guaranteed maximum price and Burns & McDonnell has no obligation to complete any work in excess of the Total Fee without written approval of additional funds from JEA.
8. Burns & McDonnell has not included hours for conducting an Arc Flash study, lighting study, lightning protection study, grounding study, developing a NERC/CIP report, conducting Harmonic and VAR/Voltage studies, or conducting a Fault study (including high/low system buses or collector system contributions).
9. Burns & McDonnell assumes the information provided by or through JEA and/or Engineer of Record (EOR) is reliable, without independent verification being required.
10. Burns & McDonnell has not included hours for any detailed design services and will only provide conceptual designs in the deliverables listed in Section 4.0.
11. Burns & McDonnell has not included hours for any boundary or topographical survey activities.
12. Burns & McDonnell has not included hours for estimating easement review and real estate acquisition.
13. Burns & McDonnell has not included hours for any underground transmission cable detailed design for the recommended project's Scope of Work.
14. Burns & McDonnell has not included hours for material procurement, which is outside the scope of this project.
15. Burns & McDonnell assumes no responsibility for the cost of damages associated with underground activities such as hydrovac excavation.
16. The pricing contained in the proposal does NOT include impacts on, including but not limited to, cost and schedule, that may occur as a result of new tariffs or other executive actions imposed on or after January 20, 2025



495 North Keller Road
Suite 300
Maitland, FL 32751
burnsmcd.com



PROPOSAL FOR

New World 230kV Substation – Transmission Project

SUBMITTED TO
JEA

January 14, 2026



January 14, 2026

Mr. Darrell Hamilton
Manager – Transmission & Substation Projects
Jacksonville Energy Authority
225 North Pearl Street Jacksonville, FL 32202

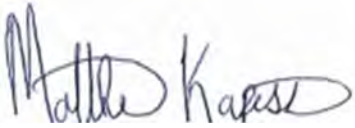
RE: New World 230kV Substation - Transmission Project

Dear Mr. Hamilton,

On behalf of Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell), thank you for this opportunity to provide a proposal for transmission line engineering and design services for the New World 230kV Substation - Transmission Project. This proposal outlines the scope of the work we will undertake in support of this project in its entirety.

We are prepared to start work on this exciting project immediately upon your approval. If you have any questions or would like to discuss this further, please feel free to reach out to Ben Garcia at (321)-249-6476.

Sincerely,

A handwritten signature in dark ink, appearing to read "Matthew Kapusta".

Matthew Kapusta, PE
Vice President
Transmission & Distribution Services
mkapusta@burnsmcd.com

A handwritten signature in dark ink, appearing to read "Randy Koncelik".

Randy Koncelik, PMP
Account Manager
Transmission & Distribution Services
Rjkoncelik@burnsmcd.com

Cc:

Mohsen Shojaeion - Electric System Engineer JEA
Benjamin Garcia - Department Manager Transmission Burns & McDonnell

1.0 Project Description

JEA has requested that Burns & McDonnell prepare a proposal and estimate to provide transmission line engineering services for the design of approximately 2-1.57 miles of transmission line from the existing Circuit 954 to the proposed greenfield substation, New World. The new line will tap into the existing Circuit 954 at approximately (30.259988°, -81.893302°) and end at the proposed New World Substation, located approximately at (30.241638°, -81.891137°), Jacksonville, Florida. The proposed transmission lines will consist of approximately Thirty (30) new single circuit transmission structures, that will be designed to also support potential future distribution installations. The requested In-Service date for the project is December 30th, 2028. Burns & McDonnell will design the new Circuit 954/960 transmission line corridor, including assessing the impact of the proposed design on the directly adjacent structures that are to remain on Circuit 954. JEA will provide the boundary of the acquired easement for the proposed transmission line. Burns & McDonnell will confirm that the proposed transmission design remains within the acquired corridor and integrates with the substation general arrangement.

2.0 Required Information

Burns & McDonnell has identified key inputs to the engineering design process which must be supplied in a timely manner (as identified below and on the schedule) to meet the delivery dates provided in this proposal. These inputs and decisions are provided by stakeholders outside the immediate control of Burns & McDonnell and, as such, could result in schedule and budget modifications in the event their delivery is delayed. The Burns & McDonnell team has made every effort to identify such external inputs but acknowledges that additional items may surface during execution of the project. All additional information requests, including impact on cost and schedule, will be addressed directly to the JEA Engineering Lead.

Information type is as follows and will be required upon award unless otherwise noted:

- Pre-construction Survey Data in LiDAR PLS-CADD .bak file format (Prior to 30% design start) of the existing Circuit 954 transmission line.
- Pre-construction Survey Data in LiDAR PLS-CADD .bak file format (Prior to 30% design start) of the proposed 954/960 New World Transmission Line Corridor.
- Line ampacity values for the transmission and distribution conductors, these values need to be for the same day and hours when the LiDAR was flying (Prior to Kick-Off Meeting) of the existing Circuit 954 transmission line.
- Record of proposed cable types for the transmission, distribution, and fiber design as stated by the Owner and PLS-CADD .WIR files confirmed by JEA (Prior to Kick-Off Meeting)
- Georeferenced substation general arrangement in DXF format (Prior to 30% design start)
- Confirmation of all wire types for the transmission line to be designed to support (Prior to 10% design start)
- Georeferenced ROW and/or easement boundaries in DXF format (Prior to 30% design start)
- Georeferenced topographic survey in DXF format (Prior to 30% design start)
- All applicable drawings include impacted existing structure, hardware drawings, record design plan & profiles, and construction drawings (Prior to 30% design start)
- JEA outage requirements (During 30% Design)
- Subsurface Exploration Report (Prior to 60% design start)
- Geotechnical Report (Prior to 60% design start)

3.0 Transmission Line Scope of Work and Engineering Approach

The transmission line design will incorporate prefabricated concrete structures with direct embed backfill wherever possible. From a high-level review of the proposed New World Transmission line route, it is anticipated that ten (10) structures will need to be designed steel structures. The transmission line will be designed for all cable types as specified by JEA during the project kick-off meeting. While it is not anticipated that the design solution will cause an impact to the directly adjacent structures, Burns & McDonnell will assess the proposed design those directly adjacent structures on Circuit 954. Specific tasks discussed with JEA have been listed below for clarity of our approach to the design.



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- Burns & McDonnell will develop a project specific design criteria document, which will outline the design parameters for the project based on industry standards and project specific requirements.
- LiDAR Survey Request-for-Proposal (RFP): Burns & McDonnell will support JEA to develop an RFP to conduct a LiDAR survey of the line sections impacted by the Project. This survey will provide the necessary high-resolution topographic data, feature mapping, and vegetation details to support the transmission line design and clearance analysis.
- Boundary & Topographic Survey Request-for-Proposal (RFP): Burns & McDonnell will support JEA to develop an RFP to conduct a boundary survey of the line sections impacted by the Project. This survey will provide the necessary easement and right-of-way information to begin spotting the proposed structure locations. The topographic survey will provide the necessary information required to complete the transmission line and access road design.
- Subsurface Exploration Request-for-Proposal (RFP): Burns & McDonnell will support JEA to develop an RFP to conduct subsurface explorations (SUEs) at the agreed structure spotting locations. The reports provided will be utilized to adjust the transmission line design as required.
- Geotechnical Investigation Request-for-Proposal (RFP): Burns & McDonnell will develop the geotechnical investigation specification based on JEA design criteria and industry best practices, confirming proposed boring locations with JEA and beginning the RFP development for the project's geotechnical investigation.
- Electrical Clearance Assessment. This assessment will verify the adequacy of shield wire locations in shielding conductors at specified angles, per JEA design criteria. It will also confirm compliance with NESC electrical clearances. Locations lacking sufficient shielding will be noted for further analysis or mitigation. It is assumed that JEA standard structure framing and hardware assemblies meet the required electrical code and industry standards. Your Burns & McDonnell team will confirm this assumption during the 30% stage of the transmission line design.
- EMF Report: EMF calculations will be prepared in accordance with Florida Administrative Rules, Chapter 62-814, using EzEMF software. It is assumed that one cross sectional assessment will be required for the Project.
- Soil Profile Development and Direct Embed Foundation Design. Our team will review the geotechnical investigation report provided by JEA. Once reviewed, initial commentary on the investigation will be provided to JEA with highlights on any foreseeable geotechnical challenges. Preliminary soil profiles will be developed for foundation designs. Preliminary direct embed foundation design and drawings will be provided
- Structure Load and Framing Design. Our team will complete the load and framing design of engineered structures. Coordination with the structure manufacturer will commence during this stage of the project. We will review structure manufacturer calculations based on provided Burns & McDonnell load and framing drawings. Final load and framing drawings that incorporate the standard JEA drilling requirements for all equipment supported on the structure are to be provided to JEA at the end of the 60% design phase of the project. It is anticipated that two structures will be engineered structures
- Access Road Design: Design development shall include preparation of horizontal and vertical alignments that provide safe and efficient access for all anticipated vehicle types, with appropriate sight distance and lane widths. The surface of the roadway shall be designed based on geotechnical recommendations and projected traffic volumes to ensure adequate structural capacity and longevity. The design shall include appropriate permanent signage and MUTCD approved devices to limit unauthorized vehicles where appropriate. Drawings will include plan/profile sheets, typical section, and select cross-sections.
- Drainage/ Stormwater Design: Drainage and stormwater engineering services will be provided in support of the proposed gravel access road located on private property in Duval County, Florida. Design development will include a review of applicable Duval County drainage criteria and utility permit requirements to confirm stormwater submittal needs. It is assumed that FDOT roadway standards are not applicable and that the access road will be permitted as utility-related infrastructure rather than a full land development project.
 - o The Burns & McDonnell team will perform a desktop drainage analysis to evaluate existing topography, contributing drainage areas, and receiving systems along the access road alignment. Drainage improvements are anticipated to include roadside swales and cross-drainage culverts beneath the



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gravel roadway. Preliminary sizing and layout of swales and culverts will be developed based on County criteria and accepted rural drainage practices for coordination with JEA and permitting agencies.

- o Final drainage and stormwater design will include refinement of swale and culvert sizing, preparation of final calculations, and development of plan sheets and details suitable for permitting and construction. If required by Duval County, a drainage report or stormwater analysis will be prepared to support the utility permit or development approval. Limited permitting support will be provided, including responses to drainage-related review comments.
- o The Project is located within the St. Johns River Water Management District (SJRWMD). It is assumed that drainage features will be designed to avoid or minimize impacts that would trigger Environmental Resource Permitting (ERP). ERP applications, exemption determinations, wetland delineation, wetland mitigation, and formal SJRWMD coordination are excluded.
- Permit Matrix. Based on the results of the environmental desktop report, Burns & McDonnell will prepare a comprehensive list of potentially applicable permits and approvals required for the permitting and construction of the proposed project. The results will be presented in a permit matrix and will identify the state, federal, and local permits that will be required to construct the Project.

Permitting:

Burns & McDonnell will identify and obtain the following permits. It is assumed that JEA will obtain the USACE Section 404 and the Florida Department of Environmental Environmental Resource Permits (ERP).

Federal Aviation Administration (FAA):

Cecil Airport, a public airport owned by the Jacksonville Aviation Authority, is located south of the project. The FAA requires notification for any proposed construction that could be an obstruction to air navigation. According to federal regulations (14 CFR Part 77), you must file a notice with the FAA if your project meets any of the following criteria:

- Any construction or alteration that is more than 200 feet above ground
- Any construction or alteration within 20,000 feet of a public use or military airport with at least one runway more than 3,200 feet long that exceeds a 100:1 slope from the nearest point of the runway
- Any construction or alteration on a public use airport, regardless of height

Cecil Airport is a public airport with multiple runways, the longest of which is over 12,000 feet, so the 100:1 slope rule applies.

Burns & McDonnell will first check the FAA Notice Criteria tool, submit all pole coordinates, ground elevation and maximum height on the FAA system to see if it will require a permit. If a pole requires it to be filed, we will create a case on the FAA system. Any physical recommendations identified would need to be provided to JEA (i.e., marking or lighting). Once it is determined that a pole needs to be filed, Burns & McDonnell will submit FAA form 7460-2 (part 1 and 2) within 5 days of the poles reaching maximum height. Given the proximity to the airport, we expect that most of the poles will require the forms.

Florida Department of Transportation

The project will cross US-228 and will require a Florida Department of Transportation (FDOT) Utility Permit. Burns & McDonnell will schedule a pre-application meeting with FDOT to help understand all the requirements before we formally submit the application. We will complete the Utility Permit Application (Form 710-010-85) and work with Engineering on the detailed plans and drawings required in the permit. Burns & McDonnell proposes to use FDOT Standard Drawing 102-625 for temporary traffic control on US-228. This standard drawing assumes that the road closure will not last longer than 5 minutes while stringing each cable.

Floodplain Development Permit



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There is a small section of the line at the north end of the project that will cross floodplains. Placing fill in a “1% annual chance flood hazard” area requires a Floodplain Development Permit from the City of Jacksonville’s Planning and Development Department. Any fill that is placed in the floodplain must be offset by creating an equal volume of flood storage (compensatory storage). Burns & McDonnell will initiate a pre-application meeting with the City of Jacksonville’s floodplain administrator. Our Engineering team will perform a “No-Adverse-Impact” or “No-Rise” analysis. This involves calculating the exact volume of fill the project will place in the Flood Hazard area and designing a “compensatory storage” area on-site to offset it. As part of the permit application submittal, we will prepare a package that includes the application form, certified engineering analysis, and detailed site plans.

Major Transmission Line Equipment

The following assets will be installed for the proposed New World 230kV transmission corridor:

- Twenty (20) C1261, Standard 230kV Single Braced Line Post, Unguyed, 3-Phase, With Distribution Underbuild
- Three (3) C1345, Designed 230kV, One Circuit Vertical, Single Steel, Dead-end, Heavy Angle Full Tension to Full Tension, With Distribution Underbuild
- Four (4) C1342, Designed 230kV, One Circuit Vertical, Single Steel, Dead-end, Light Angle 0-15 Degrees, With Distribution Underbuild
- Four (4) C1343, Designed 230kV, One Circuit Vertical, Single Steel, Dead-end, Medium Angle 15-30 Degrees, With Distribution Underbuild
- All structures will support the following:
 - o JEA specified shield wire.
 - o JEA specified transmission conductor, one (1) circuit.
 - o JEA specified ADSS wire.
 - o JEA specified distribution conductor, one (1) circuit.
 - o JEA specified distribution neutral.

The following assets will be removed for the proposed New World 230kV transmission corridor:

- One (1) 230kV, One Circuit Vertical, Dead-end

4.0 Transmission Line Deliverables

Burns & McDonnell will supply the following deliverables based on the provided milestones to JEA:

10% Design Submittal

- Project Schedule
- Survey Specification
- Establish Geotechnical Investigation scope.
- Project Design Criteria Document – Issue for Review
- Concept-level drainage approach documented via exhibits and/or memorandum
- Determination of all wire types
- Permit Matrix

30% Design Submittal

- Determination of structure material type
- Finalized Geotechnical Investigation scope.
- 30% PLS-CADD File (used for structure configuration and spotting only)
- Finalized Project Design Criteria Document
- Determination of Long Lead Bill of Material
- 30% Transmission Line Design Drawing Package
 - o Preliminary Plan and Profiles
 - o Index Drawing
- Preliminary EMF Report
- Transmission Line Corridor Vegetation Clearing Support
- Wire blowout assessment to confirm blowout is within previously acquired right-of-way.
- Preliminary drainage plan exhibits and calculations summary



60% Design Submittal

- 60% PLS-CADD File (used for structure configuration and spotting only)
- 60% Transmission Line Design Drawing Package
 - Preliminary Plan and Profiles
 - Index Drawing
 - Preliminary Structure Framing / Drilling Drawings
 - Hardware Assembly Drawings
 - Construction Drawings (Damper Placement, Phasing)
 - Bill of Materials
- Finalized Structure Load Design
- Preliminary Access Road Design
- Drainage Plan Sheets, Details, Calculations
- Stormwater Report (if required)
- Transmission Line – Permit Drawing Support

90% Design Submittal

- 90% PLS-CADD File
- 90% Transmission Line Design Drawing Package
 - Preliminary Plan and Profiles
 - Index Drawing
 - Preliminary Structure Framing Drawings
 - Hardware Assembly Drawings
 - Construction Drawings (Staking, Damper Placement, Phasing, Sag Charts)
 - Bill of Materials
- Finalized EMF Report
- Foundation Design & Drawings
- Detailed Access road design
- Drainage Plan Sheets, Details, Calculations
- Stormwater Report (if required)
- Specification for construction
- Construction sequencing
- Construction Specification

Issue for Construction (IFC) Package (100% Design Submittal)

IFC package will consist of the following in addition to all finalized items from the 90% package:

- Final Engineering Transmittal

The electronic documents, including the PLS-CADD model will be provided to JEA with the issuance of the IFC Package.

As-Built Package

The following items will be provided to JEA after receiving construction records.

- As-Built Plan & Profiles (Auto-CAD)
- Other Reference Plan & Profile Drawings (Auto-CAD)
- PLS-CADD Backup files with redlines incorporated.

5.0 Construction Support

In-Office Construction Support

After issuance of the IFC package, Burns & McDonnell will remain available to support JEA with review of contractor material submittals and technical support required to answer contractor requests for information related to the IFC package. Forty (40) hours of in-office support has been included in the estimate for these engineering services. During this time, requests for information (RFIs) from the contractor regarding the IFC package will be answered and contractor submittals will be reviewed.



Construction Site Visits

In addition to in-office construction support, Burns & McDonnell proposes to also conduct two (2) site visits for the following: project kick-off meeting, final staking confirmation / construction kick-off. Each trip is anticipated to include one day of on-site support, including travel time for up to two engineers.

Conformed to Construction Record (CCR) Documents: As part of the project closeout, CCR drawings will be developed. IFC drawings will be updated after receiving construction records provided by JEA. It is expected that the construction contractor will certify their work was performed in accordance with the construction contract, specifications, documents and drawings or otherwise clearly indicate any changes made and provide supporting information necessary to justify such changes. CCR drawings will not be sealed by a professional Burns & McDonnell engineer.

Upon completion of the CCR drawings, an electronic copy of the design-related materials to close out the project will be provided. Included in this package will be the design criteria document and AutoCAD files of all the CCR drawings.

Burns & McDonnell has included thirty (30) hours to complete this effort and will complete the CCR drawings and PLS-CADD as-built model after the completion of the construction.

6.0 Project Management

Burns & McDonnell's project manager will provide general project administration, budgeting, invoicing, change management, risk assessment and day-to-day management of the Burns & McDonnell effort.

Kick-Off Meeting

A project kick-off conference call will be scheduled following the award of the project. The primary objective of this meeting will be to exchange requested information, review the project plan and build consensus for the next steps. Some of the key discussion items will be as follows:

- Review work previously completed; and discuss objectives and expectations moving forward
- Identify project roles and responsibilities, and JEA communication lines and protocols
- Review scope of work, schedule and key project risks
- Identify and exchange information needed to perform the work

Project Review Meetings

In addition to the project kick-off meeting, Burns & McDonnell has also included project review meetings with JEA and key stakeholders as indicated below. These meetings will be held to review submitted deliverables, discuss comments, solicit feedback on each package and discuss the overall project status. Each meeting will be attended by at least two people from Burns & McDonnell. The following remote team's meetings are proposed, and anticipated to take up to two hours each:

- 30% transmission line design review meeting
- 60% transmission line design review meeting
- 90% transmission line design review meeting
- 100% transmission line design review meeting

Project Status Meetings

Burns & McDonnell will attend bi-weekly, one-hour conference call with the JEA project team to discuss progress, action items and issues for the duration of project work. Attendance of Burns & McDonnell for this meeting will include the project manager and engineering leads.

It is expected that miscellaneous additional conference calls will be required throughout the course of the project. Burns & McDonnell has allocated an additional four man-hours per month, as a level of effort for this item throughout the proposed project duration.

7.0 Project Schedule and Estimate – Transmission Line and Project Management

The estimated schedule for the transmission line project is illustrated in the table below.



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SCOPE – New World 230 kV Substation - Transmission	DATE
Project Start (Based on JEA Project Scope Statement)	10/01/25
Design Start	12/01/25
Design Finish	2/15/27
Construction Bid & Award	3/15/27
As-built, Burns & McDonnell Project Close Out	Substantial Completion + 4 weeks

The fixed price cost for the transmission line project scope identified in this proposal is illustrated in the table below.

SCOPE – New World 230 kV Substation - Transmission	FEE
Transmission Line Engineering	\$ 482,274.35
Access Road Design	\$ 24,784.11
Drainage Design	\$ 24,840.50
Permit Support	\$18,095.74
Construction Support	\$ 29,549.68
Project Management & Controls	\$ 60,139.28
Travel and Expenses	\$ 2,350.00
TOTAL FEE: \$ 642,033.66	

The milestone payment schedule is illustrated in the table below.

SCOPE – New World 230 kV Substation - Transmission	Anticipated Milestone Payment date*	Milestone Payment Amount
10% Design Submittal to JEA	2/2/26	\$128,406.73
30% Design Submittal to JEA	3/31/26	\$192,610.00
60% Design Submittal to JEA	6/23/26	\$192,610.00
90% Design Submittal to JEA	12/29/26	\$64,203.37
IFC Design Submittal to JEA	2/9/27	\$32,101.68



Award #5 Supporting Documents 01/29/2026

As-Built Package Submitted	Const Cplt + 4 Wks	\$32,101.68
TOTAL FEE: \$ 642,033.66		

* Based on a Notice to Proceed date of 1/16/2026



7.1 Assumptions, Clarifications and Exceptions

1. This proposal outlines the scope of the work Burns & McDonnell will undertake in support of this project in its entirety. Any alterations, additions or deletions to the scope of the work would be executed with a mutually agreeable change order.
2. The scope and estimate detailed in this proposal are contingent upon the major transmission line equipment specified in the 'Major Transmission Line Equipment' section and the confirmation of the New World Substation location prior to the 30% Design Start.
3. This proposal assumes the two structures tapping into the existing Circuit 954 will be drilled-pier, dead-end structures aligned with Circuit 954 to mitigate load adjustments. While our scope includes the analysis of the adjacent existing structures based on this configuration, it excludes design efforts to modify or replace them. Should the analysis determine these structures are adversely affected, the scope for their modification or replacement will be addressed via a mutually agreeable change order.
4. The proposed scope of work assumes there is not a required access road highway crossing. Access road will not cross Normandy Boulevard (SR 228)
5. The design and engineering for the access road connecting to the New World Substation is outside the scope of this proposal.
6. Access Road Design: The limited design effort is for access roads on private property. More information is required if support is needed to connect to FDOT/County roadway. This design effort excludes improvements or connections to FDOT / County right-of-way, permitting, and utility relocations.
7. Burns & McDonnell assumes that established transmission line standards exist and will serve as the basis for this design. We have allocated specific time and budget to adapt these standards to accommodate the requested distribution underbuild requirements.
8. For estimating purposes, we assume that only a single review cycle will be required for fabrication drawings and design reviews with JEA.
9. Burns & McDonnell assumes that JEA standard material specifications will be utilized. These standards are assumed to be electrically and structurally suitable for this project; and additional studies to identify elements of the design criteria and standards will not be required.
10. Burns & McDonnell has not included fee for survey activities. It is anticipated that any additional survey requirements will be completed by JEA surveyors or subcontractors.
11. Burns & McDonnell has not included fee to develop new hardware assemblies. If needed, we can create hardware specifications and assemblies.
12. Burns & McDonnell has not included fee for preparation or field activities associated with subsurface exploration or compilation of a geotechnical report.
13. Burns & McDonnell has not included fee for developing any drawings related to environmental (FEDP) permitting.
14. Burns & McDonnell has not included fee for matting placement drawings and coordination.
15. Burns & McDonnell has assumed that transmission standards will be developed to be utilized for the design of this project. Burns & McDonnell has not included professional engineering services for electrical studies (e.g. lightning performance, insulation coordination, impedance, conductor selection, grounding, corona, fault current analysis, or others). If professional engineering services are required for electrical studies, Burns & McDonnell can submit a separate proposal for those services. Support has included hours to perform EMF calculations.
16. The transmission line design approach for this project is based on static loads determined from industry standard practices, industry design manuals, and applicable codes. Burns & McDonnell will not perform site specific wind or structure studies to evaluate the impact of site-specific weather conditions on structure motion or the probability of structure and structure component vibration. Also, Burns & McDonnell will not calculate dynamic loads or design for structure or structure component vibration. These types of local dynamic analyses are extremely complex, are outside the scope of work for this assignment, and are not typical industry standards for transmission engineering services.



Award #5 Supporting Documents 01/29/2026

17. Burns & McDonnell assumes that pre and post-construction LiDAR and deed mapping for the project is to be obtained by JEA. This proposal includes time to support JEA's selected surveyor by providing information already developed as part of the design effort.
18. Burns & McDonnell assumes geotechnical investigation/soil boring work will be obtained by JEA.
19. No field assessments, including cultural, wetland or protected species field surveys, are included in the scope of the work.
20. Burns & McDonnell assumes the route provided by JEA will not change.
21. JEA will be responsible for FDEP and USACE Permits. It is assumed Burns & McDonnell will be responsible for providing an Environmental Desktop report/Permit Matrix and obtain all non-environmental permits, including FAA, FDOT Utility Permits and Floodplain permitting support.
22. Mitigation costs associated with wetland impacts will not be included in the permit matrix. This is typically done after wetland delineation surveys are completed following specific guidelines from U.S. Army Corp of Engineers and Florida Department of Environmental Protection.
23. The City of Jacksonville Right-of-Way Permit will be obtained by the Construction Contractor as required by the City.
24. Burns & McDonnell assumes the exclusion of storm system permits, preparation of environmental resource permitting and application, unsuitable soil remediation, and detention/retention system design.
25. Assumes one round of comments from FDOT and City of Jacksonville Development Services for floodplain permitting.





495 North Keller Road
Suite 300
Maitland, FL 32751
burnsmcd.com



PROPOSAL FOR

JEA Northside Generation - TG1A and TG1B 138kV Tie Project

SUBMITTED TO
JEA

September 17, 2025



September 17, 2025

Mr. Darrell Hamilton
Manager, Transmission & Substation Projects
JEA
225 North Pearl Street
Jacksonville, FL 32202

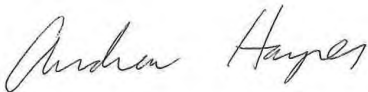
Dear Mr. Hamilton,

On behalf of Burns & McDonnell, thank you for this opportunity to extend our design services for the Northside Generation TG1A and TG1B 138kV Tie project (The "Project"). This proposal outlines the scope of services we will undertake in support of this project in its entirety.

This project has extremely time-sensitive and challenging needs, which Burns & McDonnell is prepared to meet. With the Northside Generation Unit 1 now limited in capacity, it is important that the design begins quickly to support the prompt energization of GSU TG1A to increase capacity with the necessary deliverables. The proposal attached is intended provide a scope of work and cost estimate for detailed design services associated with this project.

We are prepared to start work on this project immediately upon your approval. If you have any questions or would like to discuss further, please feel free to contact Randy Koncelik at (551) 404-8393.

Sincerely,

A handwritten signature in black ink, reading "Andrew Harper".

Andrew Harper, PE
Regional Global Practice Manager
Transmission & Distribution Services
aharper@burnsmcd.com

A handwritten signature in black ink, reading "Randy Koncelik".

Randy Koncelik, PMP
JEA Account Manager
Transmission & Distribution Services
rjkoncelik@burnsmcd.com

Cc: Jonathan Maywood, JEA Electric Systems Engineer

1.0 Project Description

JEA has requested Burns & McDonnell Engineering Company, Inc. (BMcD) provide a proposal and estimate to provide detailed design engineering services for the TG1A and TG1B 138kV Tie Project at the Northside Generation Facility. The project site is in the Northeast area of JEA's service territory, near the St. John's River.

Due to the failure of a 138kV pothead on the middle phase of the generator step-up (GSU) transformer TG1A, the GSU is no longer energized and has been taken out of service. JEA transmission planning has requested engineering provide a design to tie the TG1A high-side (138kV) to the adjacent TG1B GSU high-side, allowing for an increase in overall Generator 1 capacity. This design would be a temporary solution, as the GSU TG1A will be limited to partial capacity in this configuration, until a permanent design can be determined. This proposal includes a project scope description and costs for BMcD's detailed design services

2.0 Required Information

Burns & McDonnell (BMcD) has identified key inputs to the engineering design process which must be provided by JEA in order to begin detailed design. The key inputs that will be required for detailed design are listed below.

- Detailed Catalog of Stock Substation and Transmission Line Structures and Materials
- Subsurface Utility Locate Survey for area around both GSU's (received)
- Topographical survey for the area around the GSUs
- Geotechnical Report from a nearby area
- Pothead Structure Detail Drawings (TG1A and TG1B)
- Pothead Foundation Detail Drawing (TG1A and TG1B)
- Oil Containment Detail Drawing for containment that surrounds both GSU banks
- Layout/Plan View drawings of the area around GSUs including:
 - Foundations/oil containment plan
 - Conduit and Underground Cable Plan
 - Grounding Plan
- Elevations drawings of GSU and Potheads
- TG1A and TG1B Manufacturer Outline Drawings

3.0 Substation Scope of Work

Substation Physical and Structural Detailed Design

Burns & McDonnell will provide substation physical/structural engineering and design services for the GSU Bus Tie project including the following:

- Rigid Bus Connection Details
- Flex Conductor and Connector Details
- Steel Adaptor Plates (if required)

Bill of Materials (BOM)

A master BOM table will be provided to capture all materials required for the bus tie design project. The BOM will specify if material will be provided by JEA, construction contractor, or others.



4.0 Substation Deliverables

Burns & McDonnell will supply the following deliverables based on the project Scope of Work. Due to the compressed project schedule, all deliverables below will be provided for JEA review in one 100% design package, that will be limited to the following:

Issued for Construction Package (100% Design Submittal):

- Single Line with Equipment Ratings
- General Arrangement drawing(s)
- Elevations and Electrical Details
- Grounding Plan and Details (as required)
- Conduit Plan (as required)
- Comments from all stakeholders incorporated into design package (as required)
- Construction Specifications including Electrical instructions (as required)
- Complete Bill of Materials (BOM)

5.0 Transmission Scope of Work

Transmission Line Detailed Design

Burns & McDonnell will provide transmission line engineering and design services for the GSU Bus Tie project including the following:

- JEA Standard Material Capacity Investigation: BMcD will investigate the available JEA stores material and assess feasibility of utilizing that material to design the required strain bus.
- Strain Bus Design: BMcD will develop the design and construction package to install the proposed strain bus for the JEA Northside generation facility

Foundation and Direct Embed Detailed Design

Utilizing a geotechnical report from a near-by area and topographical survey (both provided by others), Burns & McDonnell (BMcD) will provide a design for all foundations (if required) and direct embed selections (if required). For any deep foundations required, BMcD will employ L-Pile and MFAD software. BMcD will provide calculations for foundations and/or direct embedded structures for JEA review.

Bill of Materials (BOM)

A master BOM table will be provided to capture all materials required for the bus tie design project. The BOM will specify if material will be provided by JEA, construction contractor, or others.

6.0 Transmission Deliverables

Burns & McDonnell will supply the following deliverables based on the project Scope of Work. Due to the compressed project schedule, all deliverables below will be provided for JEA review in one 100% design package, that will be limited to the following:

Issued for Construction Package (100% Design Submittal):

- PLS-CADD Model of the Northside Gen
- Hardware Framing Drawings
- Hardware Assembly Drawings
- Plan Detail Drawings
- Foundation Design Drawings
- Sag & Tension Charts
- Comments from all stakeholders incorporated into design package (as required)
- Construction Specifications (Electrical and Foundation instructions)(as required)
- Complete Bill of Materials (BOM)



7.0 Construction Support

Burns & McDonnell will provide construction support services to JEA during bus tie installation including the following:

In-Office Construction Support

After issuance of the IFC Package, Burns & McDonnell will remain available to support Purchaser/Final Owner with review of contractor material submittals and technical support required to answer contractor requests for information related to the IFC Package. Five (5) hours of in-office support has been included in the estimate for engineering services. During this time, requests for information (RFIs) from the contractor regarding the IFC package will be answered and contractor submittals will be reviewed.

Conformed to Construction Record Documents

As part of the project closeout, Conformed to Construction Record drawings will be developed. IFC drawings will be updated after receiving construction records provided by JEA. It is expected that the construction contractor will certify their work was performed in accordance with the construction contract, specifications, documents, and drawings or otherwise clearly indicate any changes made and provide supporting information necessary to justify such changes. Conformed to Construction Record drawings will not be sealed by a Burns & McDonnell Professional Engineer.

Upon completion of the Conformed to Construction Record drawings, an electronic copy of the design related materials to close out the Project will be provided. Included in this package will be the design criteria document and AutoCAD files of all the Conformed to Construction Record drawings.

Burns & McDonnell has included Ten (10) hours to complete this effort and will complete the Conformed to Construction Record drawings within a month after receiving a full set up redlines from the construction manager.

8.0 Project Management and Meetings

Burns & McDonnell's (BMcD) project manager will provide support for the BMcD team and BMcD project related efforts which include internal project budgeting, invoicing for BMcD services, change management for BMcD project work, risk assessment for BMcD project scope and day-to-day management of the Burns & McDonnell effort.

Project Review Meetings

In addition to the Project Kickoff Meeting, Burns & McDonnell has also included project review meetings with JEA and key stakeholders as indicated below. These meetings will be held to review submitted deliverables, discuss comments, solicit feedback on each package, and discuss the overall project status. Each meeting will be attended by at least two people from Burns & McDonnell. The following remote Team's meetings are proposed, and anticipated to take up to one (1) hour each:

- 100% Physical Design Review Meeting

Project Status Meetings

Burns & McDonnell will attend up to five (5) total, one-hour conference calls with the JEA project team to discuss progress, action items, and issues for the duration of project work. Burns & McDonnell attendance for this meeting will include the Project Manager and two (2) engineers.



9.0 Project Estimate

The estimated cost for the Transformer Bus Tie project scope is illustrated in the table below.

NORTHSIDE GEN – TRANSFORMER BUS TIE ESTIMATE		FEE
Substation Detailed Design		\$15,500.00
Transmission Detailed Design		\$37,500.00
Project Management		\$6,000.00
Construction Support and As-Builts		\$2,000.00
		TOTAL FEE: \$61,000.00

9.0 Project Schedule

The estimated schedule for the Transformer Bus Tie project scope is shown in the table below.

NORTHSIDE GEN – TRANSFORMER BUS TIE SCHEDULE		DATE
100% Design Package		9/26/2025

11.0 Assumptions, Clarifications and Exceptions

1. This proposal outlines the scope of the work Burns & McDonnell (BMcD) will undertake in support of this project in its entirety. Any alterations, additions or deletions to the scope of the work would be executed with a mutually agreeable change order.
2. BMcD assumes the information provided by or through JEA is accurate and reliable, without independent verification being required.
3. JEA assumes all responsibility for determining safe and proper operation of the combined TG1A and TG1B with the single HPFF transmission line. BMcD has not included any hours for the analysis of the existing HPFF transmission lines, or operation of TG1A and TG1B in a parallel configuration.
4. BMcD transmission scope of work is limited to the transmission structures and overhead strain bus designs.
5. BMcD has not included hours for any boundary, topographical or subsurface survey activities and assumes this work will be done by others.
6. BMcD has not included cost for any site visit in this proposal.
7. BMcD has not included hours for developing any drawings or estimates related to permitting and assumes this will be done by others.
8. JEA assumes all responsibility for SPCC and environmental requirements.
9. BMcD has not included hours for developing construction methods, outage coordination, and construction sequences for the Scope of Work described within the detailed design provided and assumes this is not within the project's Scope of Work.
10. BMcD assumes that a geotechnical investigation and report will be provided by JEA prior to the detailed design project start to support the conceptual designs included in the study's Scope of Work.
11. BMcD has not included hours for Protection and Controls (P&C) or relays settings design.
12. The not-to-exceed price is not a guaranteed maximum price and Burns & McDonnell has no obligation to complete any work in excess of the Total Fee without written approval of additional funds from JEA.



Award #5 Supporting Documents 01/29/2026

13. BMcD has not included hours for conducting an Arc Flash study, lighting study, lightning protection study, grounding study, developing a NERC/CIP report, conducting Harmonic and VAR/Voltage studies, or conducting a Fault study (including high/low system buses or collector system contributions).
14. BMcD assumes that JEA standard material specifications will be utilized. These standards are assumed to be electrically and structurally suitable for this project and additional studies to identify elements of the design criteria and standards will not be required.
15. BMcD has not included hours for material procurement, which is outside the scope of this project.
16. The pricing contained in the proposal does NOT include impacts on, including but not limited to, cost and schedule, that may occur as a result of new tariffs or other executive actions imposed on or after Ja







PROPOSAL FOR

JEA Northside Generation – Initial Assessment and Conceptual Designs for the GSU TG1A Reenergization Project

SUBMITTED TO
JEA

August 22, 2025



August 22, 2025

Mr. Darrell Hamilton
Manager, Transmission & Substation Projects
JEA
225 North Pearl Street
Jacksonville, FL 32202

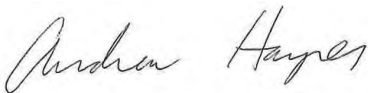
Dear Mr. Hamilton,

On behalf of Burns & McDonnell (BMCD), thank you for this opportunity to extend our conceptual design services for the Northside Generation Transformer TG1A Recovery Project (The "Project"). This proposal outlines the scope of services we will undertake in support of this project in its entirety.

This project has extremely time-sensitive and challenging needs, which Burns & McDonnell is prepared to meet. With the Northside Generation Unit 1 now limited in capacity, it is important that the design begins quickly to support the prompt recovery of generation capacity with the necessary deliverables. The proposal attached is intended to initiate the project and allow BMCD to provide conceptual design options, while the team assesses the estimate to complete a detailed design package.

We are prepared to start work on this project immediately upon your approval. If you have any questions or would like to discuss further, please feel free to contact Randy Koncelik at (551) 404-8393.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Harper".

Andrew Harper, PE
Regional Global Practice Manager
Transmission & Distribution Services
aharper@burnsmcd.com

A handwritten signature in black ink, appearing to read "Randy Koncelik".

Randy Koncelik, PMP
JEA Account Manager
Transmission & Distribution Services
rjkoncelik@burnsmcd.com

Cc: Jonathan Maywood, JEA Electric Systems Engineer

1.0 Project Description

JEA has requested Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) provide a proposal and estimate to provide an initial scoping site visit and conceptual design engineering services for the Transformer TG1A Reenergization Project at the Northside Generation Facility. The project site is in the Northeast are of JEA's service territory, near the St. John's River.

Due to the failure of a 138kV pothead on the middle phase of the generator step-up (GSU) transformer TG1A, the GSU is no longer energized and has been taken out of service. JEA transmission planning has requested engineering provide options to tie the TG1A GSU high-side (138kV) to the adjacent TG1B GSU high-side, allowing for an increase in overall Generator 1 capacity. This would be a temporary solution until a permanent design can be determined. This proposal includes initial project costs for the BMcD team to visit the site, research and provide conceptual design options.

2.0 Required Information

Burns & McDonnell (BMcD) has identified key inputs to the engineering design process which must be provided by JEA in order to begin detailed design. The detailed design package will be completed under a separate proposal once the conceptual design has been approved by JEA. The key inputs that will be required for detailed design are listed below.

- Subsurface Utility Locate Survey for area around both GSU's
- Topographical survey for the area around the GSUs
- Geotechnical Report from a nearby area
- Pothead Structure Detail Drawings (TG1A and TG1B)
- Pothead Foundation Detail Drawing (TG1A and TG1B)
- Oil Containment Detail Drawing for containment that surrounds both GSU banks
- Layout/Plan View drawings of the area around GSUs including:
 - Foundations/oil containment plan
 - Conduit and Underground Cable Plan
 - Grounding Plan
- Elevations drawings of GSU and Potheads
- TG1A and TG1B Manufacturer Outline Drawings

3.0 Scope of Work

Substation and Transmission Line

The BMcD Team will perform a site visit to the Northside Generation Facility to evaluate the existing conditions, GSU surrounding area and the nearby switchyard. After the initial scoping site visit has been completed, Burns & McDonnell will provide conceptual design options for JEA to evaluate. These options may include the following:

- Switchyard design changes
- Underground and Overhead Transmission Line replacements or new installations
- Existing Structures alterations

4.0 Deliverables

Burns & McDonnell will supply the following deliverables based on the project Scope of Work. After the site visit, multiple conceptual designs will be completed, which will be provided to the JEA project manager and O&M team. The deliverables that will be provided are limited to the following:

- Conceptual plan view sketches
- Conceptual elevation view sketches
- Descriptions of conceptual design Scope of Work

5.0 Project Status Meetings



Award #5 Supporting Documents 01/29/2026

Burns & McDonnell will attend up to two (2) total, one-hour conference calls with the JEA project and O&M teams to discuss design option preferences, action items, potentials design risks and risk mitigation options during the initial project work. Burns & McDonnell attendance for this meeting will include the Project Manager and four (4) engineers.

6.0 Project Estimate – Initial Project Site Visit and Conceptual Designs

The estimated cost for the initial GSU transformer bus tie project scope is illustrated in the table below.

NORTHSIDE GEN – GSU TIE CONCEPTUAL ESTIMATE		FEE
Substation and Transmission Line Conceptual Designs		\$20,000.00
Project Management		\$2,500.00
Travel & Expenses		\$2,500.00
TOTAL FEE: \$25,000.00		

7.0 Assumptions, Clarifications and Exceptions

1. This proposal outlines the scope of the work Burns & McDonnell (BMcD) will undertake in support of this project in its entirety. Any alterations, additions or deletions to the scope of the work would be executed with a mutually agreeable change order.
2. BMcD is directed to rely upon information provide by or through JEA, without independent verification.
3. BMcD has not included hours for developing any drawings or estimates related to permitting and assumes this will be done by others.
4. BMcD has not included hours for developing construction methods, outage coordination, and construction sequences for the Scope of Work described within the conceptual design options provided and assumes this is not within the project's Scope of Work.
5. BMcD assumes that a geotechnical investigation and final report will be provided by JEA prior to the detailed design project start to support the conceptual designs included in the study's Scope of Work.
6. BMcD has not included hours for Protection and Controls (P&C) or relays settings conceptual or detailed design.
7. The not-to-exceed price is not a guaranteed maximum price and Burns & McDonnell has no obligation to complete any work in excess of the Total Fee without written approval of additional funds from JEA.
8. BMcD has not included hours for conducting an Arc Flash study, lighting study, lightning protection study, grounding study, developing a NERC/CIP report, conducting Harmonic and VAR/Voltage studies, or conducting a Fault study (including high/low system buses or collector system contributions).
9. BMcD assumes the information provided by or through JEA is reliable, without independent verification being required.
10. BMcD has not included hours for any substation detailed design services and will only provide conceptual designs, which are listed in Section 4.0.
11. BMcD has not included hours for any boundary or topographical survey activities.
12. BMcD has not included hours for any underground or overhead transmission line detailed design for the project's Scope of Work.

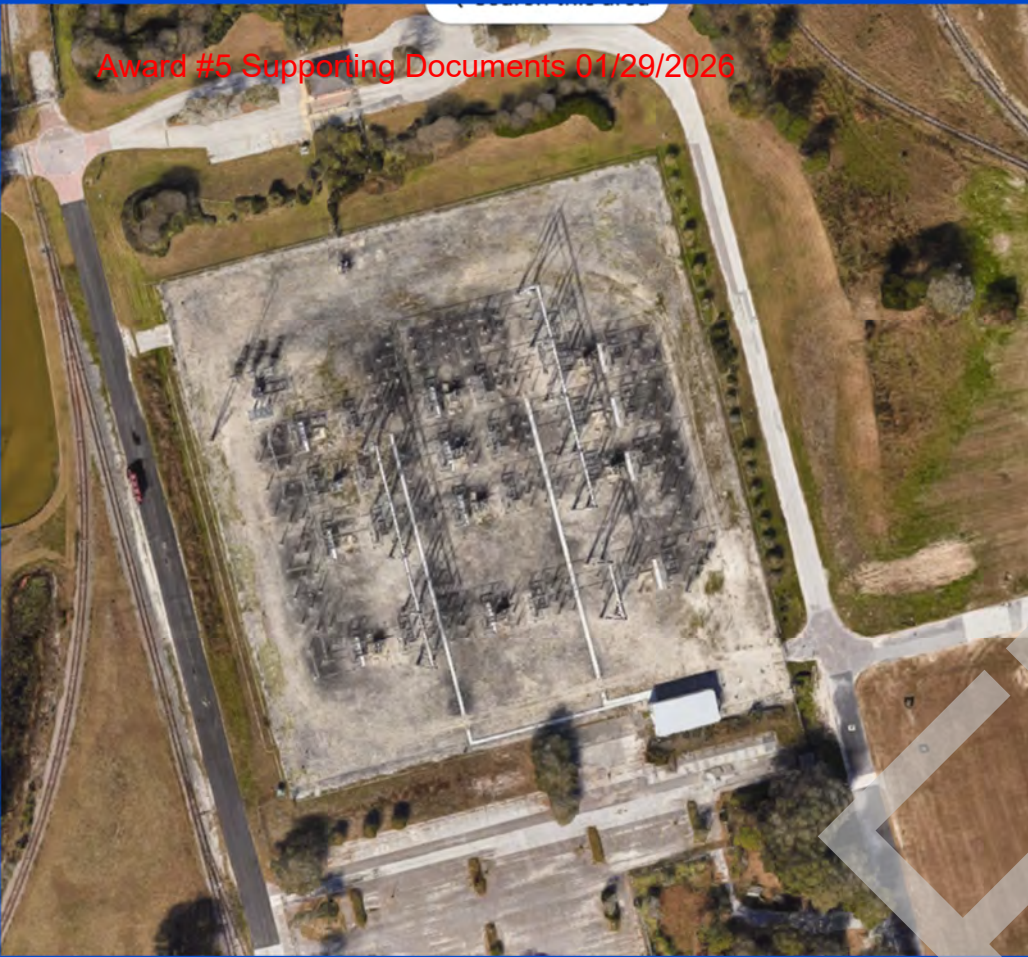


Award #5 Supporting Documents 01/29/2026

13. BMcD assumes that JEA standard material specifications will be utilized. These standards are assumed to be electrically and structurally suitable for this project and additional studies to identify elements of the design criteria and standards will not be required.
14. BMcD has not included hours for material procurement, which is outside the scope of this project.
15. The pricing contained in the proposal does NOT include impacts on, including but not limited to, cost and schedule, that may occur as a result of new tariffs or other executive actions imposed on or after January 20, 2025.







PROPOSAL FOR

**JEA SJRPP Substation -
230-26kV T2 Addition Project**

**SUBMITTED TO
JEA**

January 9, 2026



January 9, 2025

Mr. Darrell Hamilton
Manager, Transmission & Substation Projects
JEA
225 North Pearl Street
Jacksonville, FL 32202

Dear Mr. Hamilton,

On behalf of Burns & McDonnell, thank you for this opportunity to extend our design services for the SJRPP 230-26kV T2 Addition project (The "Project"). This proposal outlines the scope of services we will undertake in support of this project in its entirety.

This project has time-sensitive and challenging needs, which Burns & McDonnell is prepared to meet. The proposal attached is intended to provide a scope of work and cost estimate for detailed design services associated with this project.

We are prepared to start work on this project immediately upon your approval. If you have any questions or would like to discuss further, please feel free to contact Randy Koncelik at (551) 404-8393.

Sincerely,

Andrew Harper, PE

Regional Global Practice Manager
Transmission & Distribution Services
aharper@burnsmcd.com

Randy Koncelik, PMP

JEA Account Manager
Transmission & Distribution Services
rjkoncelik@burnsmcd.com

Cc: Hieu Dinh, JEA Electric Systems Engineer

1.0 Project Description

JEA has requested Burns & McDonnell Engineering Company, Inc. (BMcD) provide a proposal and estimate to provide detailed design services for the 230-26kV, 50MVA T2 Addition Project at the SJRPP Substation. The project site is in the Northeast area of JEA's service territory.

To address the new development in this area, including a future proposed LNG plant, JEA planning has requested a second T2 transformer be added to the existing SJRPP substation. This addition will also add redundancy and increase the reliability for the existing Circuits 251, 252 and 253.

2.0 Required Information

Burns & McDonnell has identified key inputs to the engineering design process which must be provided by JEA in order to complete detailed design. The key inputs that will be required for design, with the associated deliverables they will be needed by, are listed below.

- Major Equipment Ratings (Prior to 10% design start)
- System Fault Data information (Prior to 60% design start)
- Existing Transmission Line information (Prior to 60% design start)
- Substation Site/Grading Design Package and/or Site Topographical Survey (Prior to 60% design start)
- Geotechnical Survey Report (Prior to 60% design start)
- Soil Resistivity Report (Prior to 60% design start)
- Foundation Reactions from structure design (prior to 90% design start)

3.0 Substation Scope of Work

Electrical Design

Burns & McDonnell will provide physical engineering and design services for the T2 transformer installation project including the following:

- Foundation detailed design for new foundations
- Updating existing Foundation Layout drawing(s)
- Creating new Electrical Elevations and Details for new installations (as needed)
- Updating existing Electrical Elevation and Details (if required)
- Updating existing Grounding and Conduit Layout drawing(s)

Foundation Design

Utilizing the geotechnical report, site/grading design, and topographical survey (all provided by others), BMcD will provide design for all new foundation selections within the substation fence based off of reactions provided by Distran. Deep foundation design will employ L-Pile or MFAD software. BMcD will provide foundation calculations in PDF format without native files. BMcD will provide design information to JEA to allow Distran to size the anchor bolts.

Structural Steel Design

- Detailed design by others (Distran)

Bill of Materials (BOM)

A master BOM table will be developed and tabularized to capture all material required for the design. BOM will specify if material will be provided by JEA and construction contractor.



4.0 Substation Deliverables

Burns & McDonnell will supply the following deliverables based on the project Scope of Work, including updating existing drawings:

30% Design Submittal

- Substation General Arrangement(s)
- Single Line Diagram(s) with Equipment Ratings

60% Design Submittal

- Electrical Plan(s)
- Foundation Plan(s)
- Grounding Plan(s)
- Control Building Plan

90% Design Submittal

- Electrical Elevations and Details (as needed)
- Conduit Details (as needed)
- Grounding Details (as needed)
- Foundation Details

Issue for Construction Package (IFC) (100% Design Submittal):

- Comments from all stakeholders incorporated into design package
- Design & Construction Specifications (Electrical and Foundation Specifications)
- Complete Bill of Materials (BOM)

As built Package:

The following items will be provided to JEA after receiving construction records and post-construction design verification.

- List of any Construction Changes
- Updated Drawings based on Redlines provided by construction.
- Grounding Verification

5.0 Construction Support

Burns & McDonnell will provide construction support services to JEA during T2 installation including the following:

In-Office Construction Support

After issuance of the IFC Package, Burns & McDonnell will remain available to support Purchaser/Final Owner with review of contractor material submittals and technical support required to answer contractor requests for information related to the IFC Package. Eight (8) hours of in-office support has been included in the estimate for engineering services. During this time, requests for information (RFIs) from the contractor regarding the IFC package will be answered and contractor submittals will be reviewed.

Construction Site Visits

In addition to in-office construction support, Burns & McDonnell proposes to also conduct a site visit to site prior to energization. The trip is anticipated to include one (1) day of on-site support including travel time for two (2) engineers.

Conformed to Construction Record Documents

As part of the project closeout, Conformed to Construction Record drawings will be developed. IFC drawings will be updated after receiving construction records provided by JEA. It is expected that the construction contractor will certify their work was performed in accordance with the construction contract, specifications, documents, and drawings or otherwise clearly indicate any changes made and provide supporting information necessary to justify such



Award #5 Supporting Documents 01/29/2026

changes. Conformed to Construction Record drawings will not be sealed by a Burns & McDonnell Professional Engineer.

Upon completion of the Conformed to Construction Record drawings, an electronic copy of the design related materials to close out the Project will be provided. Included in this package will be the Microstation files of all the Conformed to Construction Record drawings.

Burns & McDonnell has included eight (8) hours to complete this effort and will complete the Conformed to Construction Record drawings within a month after the completion of the construction.

5.0 Project Management and Meetings

Burns & McDonnell's (BMcD) project manager will provide support for the BMcD team and BMcD project related efforts which include internal project budgeting, invoicing for BMcD services, change management for BMcD project work, risk assessment for BMcD project scope and day-to-day management of the Burns & McDonnell effort.

Kickoff Meeting

A project kickoff conference call will be scheduled following award of the project. The primary objective of this meeting will be to exchange requested information, review the project plan and build consensus for next steps. Some of the key discussion items will be:

- Review work previously completed, and discuss objectives and expectations going forward
- Identify project roles and responsibilities and JEA communication lines and protocol
- Review scope of work, schedule, and key project risks
- Identify and exchange information needed to perform the work

Project Review Meeting

In addition to the Project Kickoff Meeting, Burns & McDonnell has also included project review meetings with JEA and key stakeholders as indicated below. These meetings will be held to review submitted deliverables, discuss comments, solicit feedback on the design package(s), and discuss the overall project status. This review meeting will be attended by at least two team members from Burns & McDonnell. The following remote Team's meetings are proposed, and anticipated to take up to one (1) hour each:

- 10% Physical Design Review Meeting
- 30% Physical Design Review Meeting
- 60% Physical Design Review Meeting
- 90% Physical Design Review Meeting
- 100% Physical Design Review Meeting

Project Status Meetings

Burns & McDonnell will attend up to ten (10) total, one-hour conference calls with the JEA project team to discuss progress, action items, and issues for the duration of project work. Burns & McDonnell attendance for this meeting will include the Project Manager and up to two (2) engineers.

6.0 Substation Project Estimate

The estimated cost for the T2 addition project scope is illustrated in the table below.

SJRP T2 ADDITION DESIGN ESTIMATE		FEE
Substation Design		\$170,000.00
Project Management and Meetings Support		\$38,000.00
Construction Support		\$7,000.00



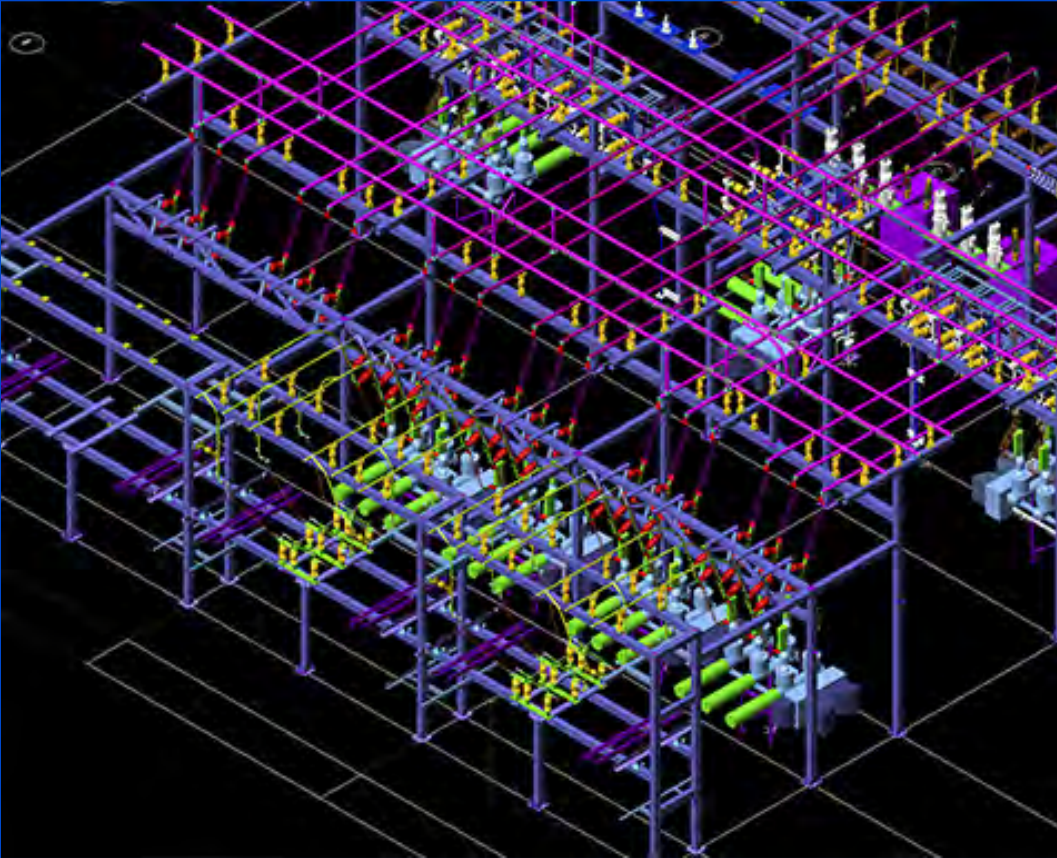
Travel and Expenses	\$5,000.00
TOTAL FEE: \$220,000.00	

7.0 Assumptions, Clarifications and Exceptions

1. This proposal outlines the scope of the work Burns & McDonnell (BMcD) will undertake in support of this project in its entirety. Any alterations, additions or deletions to the scope of the work would be executed with a mutually agreeable change order.
2. BMcD assumes the information provided by or through JEA is accurate and reliable, without independent verification being required.
3. BMcD has not included hours for any boundary, topographical or subsurface survey activities and assumes this work will be done by others (if required).
4. BMcD has not included hours for developing any drawings or estimates related to permitting and assumes this will be done by others (if required). BMcD has not included hours for obtaining any permit that may be required for the project's Scope of Work.
5. BMcD has not included hours for developing any drawings related to site and drainage design and assumes this will be done by others (if required).
6. JEA assumes all responsibility for SPCC and environmental requirements including permitting.
7. BMcD has not included hours for steel structure design/calculations and assumes this will be done by others.
8. BMcD has not included hours for developing construction methods, outage coordination, and construction sequences for the Scope of Work described within the detailed design provided and assumes this is not within the project's Scope of Work.
9. BMcD has not included hours for developing a geotechnical scope of work, geotechnical investigation or geotechnical report and assumes these will be provided by JEA prior to the detailed design project start.
10. BMcD has not included hours for Protection and Controls (P&C) or relays settings design.
11. The not-to-exceed price is not a guaranteed maximum price and Burns & McDonnell has no obligation to complete any work in excess of the Total Fee without written approval of additional funds from JEA.
12. BMcD has not included hours for conducting an Arc Flash study, lighting study, developing a NERC/CIP report, conducting Harmonic and VAR/Voltage studies, or conducting a Fault study (including high/low system buses or collector system contributions).
13. BMcD assumes that JEA standard material specifications will be utilized. These standards are assumed to be electrically and structurally suitable for this project and additional studies to identify elements of the design criteria and standards will not be required.
14. BMcD has not included hours for developing any drawings related to vegetation management.
15. BMcD has not included hours for supporting easement review and real estate acquisition.
16. The testing and commissioning plan is to be performed by others.
17. BMcD has not included hours for any underground transmission cable design for the project's Scope of Work.
18. BMcD has not included hours for material procurement, which is outside the scope of this project.
19. BMcD assumes that only a single review cycle will be required for vendor calculations, fabrication drawings and BMcD design reviews by JEA.
20. The pricing contained in the proposal does NOT include impacts on, including but not limited to, cost and schedule, that may occur as a result of new tariffs or other executive actions imposed on or after January 20, 2025.







PROPOSAL FOR
JEA Standards and Bentley OpenUtilities Support
Phase I and II

Contract # JEA11972

SUBMITTED TO
JEA

January 7, 2026



January 7, 2026

Mr. Darrell Hamilton
Manager, Transmission & Substation Projects
JEA
225 North Pearl Street
Jacksonville, FL 32202

RE: JEA Standards and Bentley OpenUtilities Phase I & II

Dear Mr. Hamilton,

On behalf of Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell), thank you for this opportunity to provide this proposal to support the development of CADD/Structure Standards, OpenUtilities Library for Distribution and Transmission level Substation design elements, and engineering support for new greenfield substations. This proposal outlines the scope of the services Burns & McDonnell will undertake in its entirety and the associated estimated cost.

We are prepared to start work immediately upon your approval. If you have any questions or would like to discuss further, please feel free to reach out to Randy Koncelik at (551) 404-8393.

Sincerely,

Andrew Harper, PE
Regional Global Practice Manager
Transmission & Distribution Services
aharper@burnsmcd.com

Randy Koncelik, PMP
Account Manager
Transmission & Distribution Services
rjkoncelik@burnsmcd.com

Cc: Hieu Dinh, JEA Electric Systems Engineer

1.0 Project Description

JEA has engaged Burns & McDonnell to provide support services for the development of CADD standards that relate to the implementation of Bentley OpenUtilities for the upcoming design of greenfield substations. Burns & McDonnell will provide services for the development of the Bentley OpenUtilities design elements in a new Library for the following seven (7) greenfield substations: Durbin, Mayo Phase II, Villages North, Maxville, E-Town, Lavilla, and New World. A Burns & McDonnell lead engineer will support the JEA-responsible PM /Lead Engineer in the design of each station's General Arrangement. Each JEA-responsible PM/Engineer with their associated Project Name and In-Service Date (ISD) are identified below:

1. Ryan Szoke – 230kV Durbin Substation – CP788-137 (Ring Bus). ISD – November 2028
2. Joshua Crow – 230kV Village North Substation – CP788-167 (Breaker-and-a-half). ISD – November 2030
3. Hiue Dinh – 230kV Maxville Substation – CP788-168 (Ring Bus). ISD – April 2030
4. Spencer Hamilton – 230kV Etown Substation - CP788-197 (Ring Bus). ISD – November 2030
5. Ian Rivera-Rosario – 69kV/13kV Lavilla Substation – CP788-228 (Ring Bus). ISD – November 2029
6. Will Aldajuste – 230kV New World Substation – CP788-104 (Breaker-and-a-half). ISD – February 2028
7. Mir Roh – 138kV Pecan Park Substation – CP788-106 (Ring Bus). ISD – February 2031

2.0 Required Information

Burns & McDonnell has identified key inputs, shown below, to support the completion of the proposed Scope of Work. These inputs must be supplied by JEA to meet the proposed issuance (completion) date provided in this proposal.

Information Type

1. Existing JEA CAD files and/or Standards documents for review
2. JEA preferred material manufacturers for all required material modeling
3. JEA preferred PDFs to use to match general appearance of the deliverables
4. JEA design requirements for standard structure development
5. JEA steel fabrication drawings from go-by station(s)

3.0 Scope of Work - Bentley OpenUtilities Implementation and Engineering Support

Bentley 3D CADD Standards Development

A critical component for the successful implementation of the Bentley OpenUtilities design software will be the creation of CADD standards to support a unified approach to the implementation of the software. Before any work can begin on the use of the software, Burns & McDonnell will support JEA in setting the standards as follows:

- Evaluate existing JEA CADD practices and identify standard procedures that JEA wishes to carry over to the Bentley OpenUtilities software.
- Propose standards and support JEA's selection of the final CADD Standard Practices for OpenUtilities
 - Levels, Naming Conventions, Hook Points, Colors, Appearance, and other CADD standards pertinent to the OpenUtilities environment

Bentley 3D Design Element Creation

Once the CADD standards have been developed, the creation of design elements to be used for the substation models contemplated in this proposal can begin. Burns & McDonnell will create a 3D Catalog of the equipment and material elements required for modeling the 230kV to 13kV substations identified in this scope. The catalog will contain elements both created by Burns & McDonnell, as well as elements provided by the equipment/material manufacturers.

Bentley 3D Steel Structure design

Burns & McDonnell will reference previously designed and constructed "go-by" JEA structures to develop a design for the required 230kV, 138kV and 13kV standard structures for use in the JEA system. Burns & McDonnell will help identify design parameters consistent within the JEA territory that can be utilized as "standard" for most new projects.



Substation General Arrangement Development

Burns & McDonnell will support the development of a roughly 30% design package for each of the seven (7) greenfield substations, inclusive of a One Line Diagram and a General Arrangement drawing. These deliverables will be created by the JEA Lead/Project Manager with Burns & McDonnell support. Burns & McDonnell's support includes a technical review of each new station's One Line and General Arrangement.

4.0 Deliverables - Bentley OpenUtilities Implementation and Engineering Support

Bentley 3D Deliverables

Bentley 3D CADD Standards

JEA designated single point contact will be responsible for the official issuance of JEA standards. Burns & McDonnell will support this with suggested industry standard practices to support standards development. JEA will be responsible for final determination of hook points, level colors, level of detail required in models, required information for each element type, etc.

Bentley 3D Design Element Library

Burns and McDonnell will lead the effort in creating an initial 3D Element Digital Library. This Library will be accessible remotely for the JEA Leads/Project Managers and Burns & McDonnell support team. It will contain the 3D elements necessary for building the seven (7) greenfield substations in a Bentley OpenUtilities 3D model space (breakers, transformers, structures, connectors, etc.) The properties of each element will vary based on the element type but will be limited to those preferred properties identified by JEA during the CADD standard development process. Once JEA and Burns & McDonnell agree that the 3D Element Library has all required elements and functionality needed to complete the seven (7) 3D substation models, Burns & McDonnell will 'hand over' the responsibility of new element creation and library maintenance to the JEA OpenUtilities Lead.

Engineering Support Deliverables

JEA Standard Structures

A Burns & McDonnell lead structural engineer will develop design standards for the required structures at all seven (7) substations. This includes providing structure design drawings (CADD and PDF) and calculations (PDF) to JEA for review and approval. The drawings and calculations provided to JEA will only be for the required 230kV, 138kV, 69kV and 13kV structures used in the design of the seven (7) greenfield substations mentioned in this proposal.

Substation General Arrangement

A Burns & McDonnell lead engineer will provide support to the seven (7) Project Managers/Leads for the development of each greenfield substation's General Arrangement. This will include in-office/remote support for technical questions from JEA project leads and remote quality reviews. For each greenfield General Arrangement, the Burns & McDonnell lead engineer will provide one (1) peer review of the General Arrangement and One-line Diagram, which includes the return of QA/QC comments via email to the JEA lead.

5.0 Project Estimate – Bentley OpenUtilities Implementation and Engineering Support

The estimated fee for the Scope of the Work described herein is listed in the table below:

BENTLEY OPEN UTILITIES IMPLEMENTATION	FEE
Project Management	\$80,500.00
CADD Standards Development	\$82,000.00
Substation Design Element Creation	\$80,000.00
Structure Design Standard Development	\$88,000.00
General Arrangement – Engineering Support	\$149,500.00
TOTAL	\$480,000.00

NOTE: Estimated fee is based on the information available and subject to change based on the needs of the project. Funding may be adjusted between disciplines as needed, but overall funding will not exceed the Total Fee of as shown above without a mutually agreeable change order.

6.0 Project Schedule

A preliminary schedule showing approximated start-end times and activity durations for the Scope of the Work described herein is illustrated in the chart below:

OPENUTILITIES PHASE 1 & 2 SUPPORT SCHEDULE							
ACTIVITY / MONTH (2026)	JAN	FEB	MAR	APR	JUNE	JULY	AUG
JEA CADD STANDARDS DEVELOPMENT (PHASE 1)							
OPENUTILITIES ELEMENT LIBRARY CREATION (PHASE 1)							
STEEL STRUCTURE STANDARDS DEV. (PHASE 1)							
GREENFIELD GENERAL ARRANGEMENT DEV. (PHASE 2)							

*Schedule activity durations and start-end dates shown above are preliminary and subject to change during project execution.

7.0 Assumptions, Clarifications and Exceptions

1. This proposal outlines the scope of the Services Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) will undertake in support of this study in its entirety. Any alterations, additions, or deletions to the scope of the Services would be executed with a mutually agreeable change order.
2. The Scope of Work listed will be provided on a Time-and-Material basis. Once a majority of the work is completed, Burns & McDonnell can reassess the pricing provided in the Estimate section above.
3. Burns & McDonnell has not included hours for developing 3D Elements that are not required for the modeling of the seven (7) greenfield substations listed in Section 1.0 above.
4. Burns & McDonnell has not included hours for developing structure design standards for structures that will not be used in the modeling of the seven (7) greenfield substations listed in Section 1.0 above.



Award #5 Supporting Documents 01/29/2026

5. Burns & McDonnell assumes “go-by” structure drawings and calculations from previous JEA projects will be provided by JEA for reference in the development of the new standard structure design.
6. The not-to-exceed price is not a guaranteed maximum price and Burns & McDonnell has no obligation to complete any work in excess of the Total Fee without written approval of additional funds from JEA.
7. JEA will identify a single point contact for the development of the CADD Design Standards and Design Element Library that will coordinate with Burns & McDonnell's lead engineer in order to provide timely responses to inquiries and make decisions on JEA's preferred design.
8. Burns & McDonnell has not included hours for the development of any steel structure fabrication drawings, or any drawings intended for structure fabrication.
9. Burns & McDonnell has not provided hours for ongoing maintenance of the Bentley Open Utilities catalog once turned over to JEA.
10. Burns & McDonnell has not included hours for conducting an Arc Flash study, lighting study, lightning protection study, grounding study, developing a NERC/CIP report, conducting Harmonic and VAR/Voltage studies, or conducting a Fault study (including high/low system buses or collector system contributions).
11. Burns & McDonnell assumes the information provided by or through JEA is reliable, without independent verification being required.
12. Burns & McDonnell has not included hours for any detailed design services.
13. Burns & McDonnell has not included hours for any boundary or topographical survey activities.
14. Burns & McDonnell has not included hours for supporting the development, or peer reviewing, of any General Arrangement beyond the scope of the seven (7) substations identified in Section 1.0 of this proposal.
15. Burns & McDonnell has not included hours for any underground transmission cable detailed design.
16. Burns & McDonnell has not included hours for material procurement, which is outside the scope of this project.
17. The pricing contained in the proposal does NOT include impacts on, including but not limited to, cost and schedule, that may occur as a result of new tariffs or other executive actions imposed on or after January 20, 2025





495 North Keller Road
Suite 300
Maitland, FL 32751
burnsmcd.com



PROPOSAL FOR

Steelbald Reactor EMT Analysis

Contract # JEA11972

SUBMITTED TO
JEA

April 3, 2025



April 3, 2025

Mr. Darrell Hamilton
Manager – Transmission & Substation Projects
JEA
225 North Pearl Street
Jacksonville, FL 32202

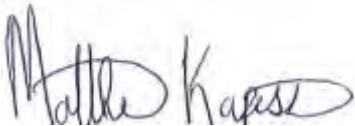
RE: Steelbald Reactor EMT Analysis Revision 1

Dear Mr. Hamilton,

On behalf of Burns & McDonnell, thank you for this opportunity to provide this revised proposal for the 1898 Study and Planning effort to perform an analysis for the reactors at the Steelbald substation. The attached proposal outlines the Scope of the Work Burns & McDonnell will undertake in support of this project in its entirety.

We are prepared to start work on this exciting project immediately upon your approval. If you have any questions or would like to discuss further, please feel free to reach out to Randy Koncelik at (551) 404-8393.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Kapusta".

Matthew Kapusta, PE
Regional Global Practice Vice President
Transmission & Distribution Services
mkapusta@burnsmcd.com

A handwritten signature in black ink, appearing to read "Randy Koncelik".

Randy Koncelik, PE
Project Manager, Point of Contact
Transmission & Distribution Services
rjkoncelik@burnsmcd.com

Cc: Joshua Crow, JEA Substation Design projects

Attachment: 1898 EMT Study Proposal



495 North Keller Road
Suite 300
Maitland, FL 32751
burnsmcd.com



April 3, 2025

Darrell Hamilton
Manager - Transmission & Substation Projects
Jacksonville Energy Authority
225 N Pearl Street
Jacksonville, FL 32202

Re: Steelbald Reactor EMT Studies Revision 1

Dear Mr. Hamilton

1898 & Co.®, a part of Burns & McDonnell, is pleased to submit this letter proposal to JEA to provide investigations and EMT studies on the reactors at their Steelbald substation. Our team is prepared to assist JEA with providing the support necessary to make this project successful. The sections below outline the proposed scope, schedule, and cost for supporting the needs for JEA.

I would like to thank you for the opportunity to provide our proposal for Steelbald reactor EMT studies. Please do not hesitate to contact me directly with any questions you may have. We look forward to working with you!

Sincerely,

A handwritten signature in blue ink, reading 'Cody Ruben', is positioned above the printed name and title.

Cody Ruben, PhD
Project Manager

A handwritten signature in black ink, reading 'Collin Hayward', is positioned above the printed name and title.

Collin Hayward
Managing Director - 1898 & Co.



Scope of Services

Project Understanding

JEA recently had a breaker failure occur at their Steelbald substation. The failure was caused by a bushing flashover, not a switching event. Due to a steel plant being served in the area, metal dust in the air likely caused the flashover to occur. The breaker that failed has a series reactor that was also damaged during the event. JEA acquired the Steelbald substation from FPL and does not know the original purpose of the reactor. Series reactors are primarily used for fault current limiting, flicker mitigation, inrush control, or harmonic resonance shifting. For JEA to determine whether or not the reactor needs to be replaced with the breaker, they have contacted 1898 & Co. to perform studies to answer the following questions:

- What was the original purpose of the reactors at the Steelbald substation?
- Are those reactors still required under the current conditions of the system?
- If they are necessary, what size reactors are required?

Study Approach

1898 & Co. will investigate the potential purpose of the Steelbald reactors through investigation of the system conditions in the area and appropriate EMT study using PSCAD. As part of the initial investigation, 1898 & Co. will work with JEA to gather the following information about the area and determine what EMT studies are most appropriate:

- Determine if the facility has large motors, furnaces, or cyclical loads. If so, model the load appropriately and run flicker studies to determine if the reactors help reduce rapid voltage changes.
- Determine if there are capacitor banks in the vicinity. If there are, include them in the model and run an inrush/outrush analysis to determine if the reactors help reduce the magnitude/frequency of the transient currents.
- Determine if there are harmonic generating loads. If so, use PQ measurements to represent the load injection and determine if the reactors help reduce harmonic distortion (by detuning). Perform harmonic scans with and without the reactors to determine the impact of the reactors.

Regardless of system conditions, PSCAD will be used to run faults in the reactors' path to determine if the fault currents will exceed the breaker ratings and perform TRV analysis for each circuit breaker at Steelbald with and without the reactors.

Based on the findings of the initial investigation, PSSE models provided by JEA will be used build switching PSCAD models of the Steelbald substation and associated loads connected to minimum and maximum Thevenin equivalents. The maximum Thevenin equivalent will be based on a peak load PSSE case. The minimum Thevenin equivalent will be based on a light load PSSE case and could simulate an N-1 condition near Steelbald if it is determined to be significant to the system strength at Steelbald.



Deliverable

The methodology, assumptions, investigation findings, and study results will be provided in the form of a report at the end of the project.

General Assumptions

- The appropriate studies to be performed in PSCAD will be determined as part of the initial investigation performed by 1898 & Co.
- The maximum Thevenin equivalent will be used for fault current and TRV analysis
- The minimum Thevenin equivalent will be used for flicker, inrush/outrush, and harmonics analysis

Responsibilities of Client

- JEA will provide peak load and light load PSSE cases and detailed transmission line data coming out of Steelbald
- JEA will work with 1898 & Co. to acquire the required information on the loads being served by Steelbald and cap banks in the area. This includes PQ meter data from Steelbald and customer loads

Timeline

The tasks described in the scope above may include all or some of the tasks per the table below. 1898 & Co will begin with the initial investigation and PSCAD Model Development (items 1 and 2) and provide JEA with a recommendation for next steps before proceeding with any additional work:

Task Description	Duration
Initial Investigation	~4 weeks
PSCAD Model Development	~6 weeks
Flicker/RVC Studies	~3 weeks
Inrush/Outrush Studies	~4 weeks
Harmonics Analysis	~4 weeks

Depending on the outcome of the Initial Investigation, more specific timelines for the necessary tasks will be discussed with JEA.

Compensation

This project will be executed under contract JEA11972 on a time and expense basis with an initial funding level of \$70,000. Based on what is known at this time, the entire analysis will not exceed \$174,000 if all studies are required. No effort beyond the initial funding of \$70k will be executed without a mutually



agreeable change order authorizing such work. Due to the nature of studies being performed, the established rates between 1898 & Co and JEA will be used. These rates are shown below for reference:

Classification	Rate (\$/hour)
Project Support	\$132.35
Analyst	\$203.70
Lead Analyst	\$231.62
Consultant	\$287.45
Manager/Senior Consultant	\$304.00
Director/Senior Manager	\$346.39
Managing Director	\$387.75

Based on these rates, the expected cost of each task is as follows:

Task Description	Duration
Initial Investigation	\$33,000
PSCAD Model Development	\$56,000
Flicker/RVC Studies	\$21,000
Inrush/Outrush Studies	\$35,000
Harmonics Analysis	\$29,000
Total	\$174,000

Terms and Conditions

With the exception of the rates, as discussed above, all services will be performed under the terms and conditions of the Contract between JEA and Burns & McDonnell Engineering Company, Inc. (JEA Contract # JEA11972) that was executed between JEA and Burns & McDonnell on August 7, 2024. Such terms and conditions are incorporated and made a part of this letter proposal.



Validity

The costs and schedule shown herein are valid for 30 days from the date of this letter, after which each is subject to change.

Acceptance

If this letter proposal is acceptable, please sign in the signature block below and return a scanned copy to me for our file.

ACCEPTED:

JEA

Signature

Name

Title

Date





CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Transmission Line Clearance Compliance BMcD Project No. 186539
Client: JEA Client Project No. HE20410
Engineer: Burns & McDonnell Contract No. JEA11972

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

At the request of JEA, adding circuits 830 and 844 to the Scope of Work for the Transmission Line Clearance Compliance & Structure Replacement 138/230 kV Project per the proposal dated May 30, 2025.

Circuit 830 138 kV: Structures 17, 53

- **Two (2) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase, Modified With Distribution Underbuild**
- **Permitting: Structure 17 is located on CSX Railroad Property; the encroachment is pending a review of the utility agreement between CSX and JEA. The pole is located in a mapped surface water ditch and may require a Verification of Exemption pursuant to 62-330.051(14)(d), F.A.C. with FDEP. Field surveys will confirm the presence of the ditch and if any other permits are required. Structure 53 will require a City of Jacksonville Right-of-Way (ROW) Permit. This permit will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Structure 53 is less than 5 miles from the Jacksonville International Airport. Burns & McDonnell will submit the pole coordinates, ground elevation, and maximum height in the Federal Aviation Administration (FAA) Notice Criteria tool. If any of the poles requires to be filed, we would create a case on the FAA system and submit form 7460-2 (part 1 and 2) within 5 days of the poles reaching maximum height. Field surveys will confirm if any other permits are required.**

Circuit 844 138 kV: Structures 20, 22, 25, 43

- **Four (4) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase, Modified With Distribution Underbuild**
- **Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required for all four structures. These permits will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Structures 20, 22, 25, and 43 are less than 5 miles from the Jacksonville International Airport. Burns & McDonnell will submit the pole coordinates, ground elevation, and maximum height in the Federal Aviation Administration (FAA) Notice Criteria tool. If any of the poles requires to be filed, we would create a case on the FAA system and submit form 7460-2 (part 1 and 2) within 5 days of the poles reaching maximum height. Field surveys will confirm if any other permits are required.**

All Terms and Conditions of the subject proposal are applicable to this additional scope.



As a result of the modification(s) described above:

The revised **Contract Price** is:

Original Contract Price	\$ 336,867
Total net amount of all previous Change Orders	(+ or -). \$ 0
Total net amount of all previous variable quantity adjustments	(+ or -). \$ 0
Total net amount of this Change Order	(+ or -). \$ 137,695
Current Contract Price, including this Change Order	\$ 474,562

The revised **Contract Time** is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	9/30/2025	N/A
Total net time adjustment* of all previous Change Orders(+ or -)	N/A	N/A
Total net time adjustment* of this Change Order	(+ or -) N/A	N/A
* Time adjustment is specified in: ☒ Working Days ☐ Calendar Days ☐ Other N/A		
Current Completion Date(s), including this Change Order	9/30/2025	N/A

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.

This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By _____

By _____

Date _____

Date _____



01-05-15 Form CO-1

CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Transmission LiDAR Str Rplc Project BMCD Project No. 186539
 Client: JEA Client Project No. P.O. 230098
 Engineer: Burns & McDonnell Contract No. JEA11972

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

1- Additional Subcontractor Work

- Additional Geotechnical exploration scope of work utilizing a Standard Penetration Test (SPT) performed continuously to 15-feet and at 5-foot centers thereafter to the boring termination depth of 60 feet with Meskel & Associates Engineering (MAE) for the following circuits and structure locations:
 - o Circuit 825: Str's 25 & 32
 - o Circuit 826: Str 14
 - o Circuit 831: Str 30
 - o Circuit 832: Str's 195 & 196
 - o Circuit 839: Str's 8, 12, 75, & 76
- Additional professional surveying services with SAM Companies (SAM) in the aforementioned structure locations above. Each structure location will include a boundary survey, topographic survey and SUE survey to identify underground data to support design.

The estimated cost for the transmission line project scope identified in this proposal is illustrated in the table below.

Scope	Fee
Additional Subcontractor Work	
Survey Subcontract – Level B SUE & Boundary Survey	\$47,520
Geotechnical Investigation Subcontract	\$57, 200
Total Fee	\$104,720

As a result of the modification(s) described above:

The revised Contract Price is:

Original Contract Price \$ 474,562
 Total net amount of all previous Change Orders (+ or -). \$ 0
 Total net amount of all previous variable quantity adjustments (+ or -). \$ 0
 Total net amount of this Change Order (+ or -). \$ 104,720
 Current Contract Price, including this Change Order \$ 579,282

The revised Contract Time is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	<u>9/30/2025</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders(+ or -)	<u>N/A</u>	<u>N/A</u>
Total net time adjustment* of this Change Order.....(+ or -)	<u>N/A</u>	<u>N/A</u>
* Time adjustment is specified in: ☒ Working Days ☐ Calendar Days ☐ Other <u>N/A</u>		
Current Completion Date(s), including this Change Order	<u>1/08/2026 (IFB)</u>	<u>N/A</u>



01-05-15 Form CO-1

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.

This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By Darrell Hamilton
Date _____

By Randolph Koncelik
Date _____



PROPOSAL FOR

Transmission Line Clearance Compliance & Structure Replacement 138/230 kV Project

Contract JEA 11972

SUBMITTED TO
JEA

May 30, 2025



May 30, 2025

Mr. Darrell Hamilton
Manager – Transmission & Substation Projects
JEA
225 North Pearl Street Jacksonville, FL 32202

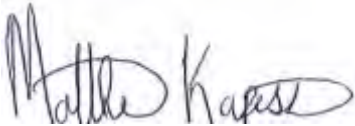
RE: Transmission Line Clearance Compliance & Structure Replacement Project

Dear Mr. Hamilton,

On behalf of Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell), thank you for this opportunity to provide a proposal to provide support for transmission line clearance compliance at various locations within JEA's territory. This proposal outlines the scope of the work we will undertake in support of this project in its entirety.

We are prepared to start work on this exciting project immediately upon your approval. If you have any questions or would like to discuss this further, please feel free to reach out to Randy Koncelik at (551)-404-8393.

Sincerely,



Matthew Kapusta, PE
Director of Operations, Florida
Transmission & Distribution Services
mkapusta@burnsmcd.com



Randy Koncelik, PMP
JEA Account Manager
Transmission & Distribution Services
Rjkoncelik@burnsmcd.com

Cc:

Sebastian Chmist - Electric System Engineer JEA
Benjamin Garcia - Department Manager Transmission BMCD

1.0 Project Description

JEA has requested that Burns & McDonnell prepare a proposal and estimate for transmission line engineering services to support the replacement of twenty-nine (29) transmission line structures throughout their system. The primary objective of this project is to rectify existing transmission line configurations to bring them back into compliance with current transmission wire clearance requirements relative to surrounding objects. The complete list of transmission circuits and the corresponding structures slated for replacement are detailed below. The project will be implemented in a phased approach and the circuits in light grey font are planned for Fiscal Year 26 and are not included in this proposal:

<u>230kV Replacements</u>	<u>138 kV Replacements</u>
Circuit 912 230 kV: Structure 157ABC	Circuit 855 138 kV: Structures 4, 25
Circuit 915 230 kV: Structures 60, 61	Circuit 825 138 kV: Structures 25, 32
Circuit 940 230 kV: Structure 40	Circuit 826 138 kV: Structure 14
Circuit 941 230 kV: Structures 17, 18	Circuit 830 138 kV: Structures 17, 53
Circuit 949 230 kV: Structures 16, 17, 18, 20, 21	Circuit 831 138 kV: Structure 30
	Circuit 832 138 kV: Structures 195, 196
	Circuit 839 138 kV: Structures 8, 12, 75, 76
	Circuit 844 138 kV: Structures 20, 22, 25, 43

All replacement structures will be engineered to accommodate the conductors and equipment currently supported by the existing structures. As part of the project, an assessment of the directly adjacent transmission structures that will remain in service will be conducted to evaluate any potential impacts resulting from the new structure installations. BMcD's scope of work includes the development of one (1) comprehensive structure procurement package for the six FY 25 circuits. Burns & McDonnell will submit a separate proposal to complete the detailed construction packages for the six circuits, which is anticipated to occur in FY 26. The final construction sequencing and implementation schedule for the replacement structures are to be determined by JEA, taking into account system outage requirements, construction crew capabilities, and seasonal considerations.

2.0 Required Information

BMcD has identified key inputs to the engineering design process which must be supplied in a timely manner (as identified below and on the schedule) to meet the delivery dates provided in this proposal. These inputs and decisions are provided by stakeholders outside the immediate control of BMcD and, as such, will necessitate schedule and budget modifications in the event their delivery is delayed. The BMcD team has made every effort to identify such external inputs but acknowledges that additional items may surface during execution of the project. All additional information requests, including impact on cost and schedule, will be coordinated directly with the JEA Engineering Lead.

Information type are as follows and will be required upon award unless otherwise noted:

- Pre-construction Survey Data in LiDAR PLS-CADD .bak file format (Prior to Kick-Off Meeting)
- Line ampacity values for the transmission and distribution conductors, these values need to be for the same day and hours when the LiDAR was flying (Prior to Kick-Off Meeting)
- Record of proposed cable types for the transmission, distribution, and fiber design as stated by the Owner and PLS-CADD .WIR files (Prior to Kick-Off Meeting)
- All applicable drawings include impacted existing structure, hardware drawings, record design plan & profiles, and construction drawings (Prior to Kick-Off Meeting)
- Post-Construction Survey Data in LiDAR PLS-CADD .bak file format (after project energization)



3.0 Transmission Line Scope of Work and Engineering Approach

The transmission line design for the replacement structures will primarily utilize prefabricated concrete structures with direct embed backfill where technically feasible. Our design solution will be developed in accordance with JEA's standard framing and hardware specifications, incorporating concrete spun structures as required. Preliminary engineering investigations will be conducted to confirm the optimal application of utilizing prefabricated structures for each specific replacement location. Regarding the project schedule, it is envisioned that all structure replacements will initially progress under a unified project schedule up to the submittal of the final structure procurement package to JEA. Following this, specific structure replacements can potentially be expedited ahead of others, depending on critical system outage requirements and constraints identified by JEA. Our general engineering approach for this project is outlined below, followed by the proposed JEA standard framing configuration and permitting requirements intended for each replacement structure:

General Engineering Approach

- BMcD will develop one (1) project specific design criteria document for all structure replacements, which will outline the design parameters for the project based on industry standards and project specific requirements.
- Structure material assessment/feasibility: BMcD will assess the structure material type, with a preference for prefabricated concrete spun structures.
- Boundary Survey Request-for-Proposal (RFP): Burns & McDonnell will develop an RFP to subcontract boundary survey services of the line sections impacted by the Project. This survey will provide the necessary easement and right-of-way information to begin spotting the proposed structure locations.
- Subsurface Exploration Request-for-Proposal (RFP): Burns & McDonnell will develop an RFP to subcontract subsurface explorations – level B (SUEs) services at the agreed structure spotting locations. The reports provided will be utilized to adjust the transmission line design as required.
- Geotechnical Investigation Request-for-Proposal (RFP): Burns & McDonnell will develop the geotechnical investigation specification based on JEA design criteria and, confirming proposed boring locations with JEA. The geotechnical investigation will support the development of the foundation solution for the structure replacements.
- Electrical Clearance Assessment. This assessment will verify the adequacy of shield wire locations in shielding conductors at specified angles, per JEA design criteria and NESC electrical clearances. Locations lacking sufficient shielding will be noted for further analysis or mitigation. It is assumed that JEA standard structure framing and hardware assemblies meet the required electrical code and industry standards. Your Burns & McDonnell team will confirm this assumption before the submission of the final structure procurement package.
- EMF Report: EMF calculations will be prepared in accordance with Florida Administrative Rules, Chapter 62-814, using EzEMF software. It is assumed that nineteen (13) cross sectional assessments will be required for the Project.
- Soil Profile Development and Direct Embed Foundation Design. Our team will review the geotechnical investigation report provided by JEA. Once reviewed, an initial commentary on the investigation will be provided to JEA with highlights on any foreseeable geotechnical challenges. Preliminary soil profiles will be developed for foundation designs. Preliminary direct embed foundation design and drawings will be provided
- Structure Load and Framing Design. Our team will complete the load and framing design of engineered structures. Coordination with the structure manufacturer will commence during this stage of the project. We will review structure manufacturer calculations based on provided Burns & McDonnell load and framing drawings.
- Easement / ROW Acquisition Support. Burns & McDonnell will assess cable blowout and provide recommended easement widths needed to meet required JEA transmission line criteria. 30 hours have been included for easement / ROW acquisition support.



Site Specific JEA Framing Standards & Permitting Support

It is anticipated that all cables will be transferred from the existing structures to the replacement structures and that the following JEA standard framing with prefabricated concrete spun structures will be utilized for the Project. Also listed below are the necessary permits required for construction.

Circuit 912 230 kV: Structure 157ABC:

- Two (2) C8244C, 230kV, Double Deadend, 90 Degree, Full tension to Full Tension, 1-Phase
- One (1) C7244C, 230kV, Double Deadend, 90 Degree, Full tension to Full Tension, No Shield, 1-Phase
- Permitting: No permits are anticipated with this circuit and will be confirmed after field surveys are completed.

Circuit 915 230 kV: Structures 60, 61

- Four (4) C1261, 230kV, Single Braced Line Post, Unguyed, 3-Phase, Modified Horizontal Configuration
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required. This permit will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Field surveys will confirm if any other permits are required.

Circuit 940 230 kV: Structure 40

- Two (2) C1261, 230kV, Single Braced Line Post, Unguyed, 3-Phase
- Permitting: Pole and access to pole (temporary matting) is located in a forested wetland. A U.S Army Corps of Engineer Nationwide Permit 57 will likely be required.

Circuit 941 230 kV: Structures 17, 18

- Two (2) C1261, 230kV, Single Braced Line Post, Unguyed, 3-Phase
- Permitting: No permits are anticipated with this circuit and will be confirmed after field surveys are completed.

Circuit 949 230 kV: Structures 16, 17, 18, 20, 21

- Five (5) C2261, 230kV, Double Braced Line Post, Unguyed, 3-Phase
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required. This permit will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Field surveys will confirm if any other permits are required.

Circuit 855 138 kV: Structures 4, 25

- Two (2) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase, Modified With Distribution Underbuild
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required for both structures. These permits will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Field surveys will confirm if any other permits are required.



4.0 Transmission Line Deliverables

Burns & McDonnell will supply the following deliverables based on the provided milestones to JEA:

Structure Procurement Package (2025 Fiscal Year, 6 Circuits)

- Subcontract – Level B SUE Survey
- Subcontract – Boundary Survey
- Subcontract – Geotechnical Investigation
- Project Design Criteria Document
- Determination of all wire types
- Determination of structure material type
- Preliminary EMF Report
- Blowout to Edge of Right of Way Assessment
- Finalized PLS-CADD Model with Proposed Structures
- Foundation Design & Drawings
- Structure Procurement Package

The electronic documents, including the PLS-CADD model will be provided to JEA with the issuance of the IFC Package.

5.0 Project Management

Burns & McDonnell's project manager will provide general project administration, budgeting, invoicing, change management, risk assessment and day-to-day management of the Burns & McDonnell effort.

Kick-Off Meeting

A project kick-off conference call will be scheduled following the award of the project. The primary objective of this meeting will be to exchange requested information, review the project plan and build consensus for the next steps. Some of the key discussion items will be as follows:

Review work previously completed; and discuss objectives and expectations moving forward

Identify project roles and responsibilities, and JEA communication lines and protocols

Review scope of work, schedule and key project risks

Identify and exchange information needed to perform the work

Project Review Meetings

In addition to the project kick-off meeting, Burns & McDonnell has also included project review meetings with JEA and key stakeholders as indicated below. These meetings will be held to review submitted deliverables, discuss comments, solicit feedback on each package and discuss the overall project status. Each meeting will be attended by at least two people from Burns & McDonnell. The following remote team's meetings are proposed, and anticipated to take up to two hours each:

Structure Procurement Package Review Meeting

Issued for Construction Package Review meeting

Project Status Meetings

Burns & McDonnell will attend a monthly, one-hour conference call with the JEA project team to discuss progress, action items and issues for the duration of project work. Burns & McDonnell attendance for this meeting will include the project manager and engineering leads.

6.0 Project Schedule and Estimate – Transmission Line and Project Management

The estimated schedule for the transmission line project is illustrated in the table below.

SCOPE	DATE
Project Start	June 15, 2025
Structure Procurement Package Submittal	September 30, 2025

The estimated cost for the transmission line project scope identified in this proposal is illustrated in the table below.

SCOPE	FEE
Transmission Line Engineering – Structure Procurement Package	\$182,504.00
Environmental Survey – Structure Procurement Package	\$12,203.00
Survey Subcontract – SUE B & Boundary Survey	\$74,360.00
Geotechnical Investigation Subcontract *	\$ 42,900.00
Project Management and Subcontract oversight	\$21,900.00
Travel and Expenses	\$3,000.00
TOTAL FEE: \$336,867.00	

*Geotechnical Contract is an estimate and will be invoiced at the actual amount plus mark-up per Contract JEA 11972



7.1 Assumptions, Clarifications and Exceptions

- This proposal outlines the complete scope of the transmission line engineering services that BMcD will provide in support of this project. Any modifications, additions, or deletions to this scope will be formally processed and executed through a mutually agreeable change order.
- This proposal includes fee for the environmental survey work, SUE Level B survey, boundary survey, geotechnical investigation, and design effort for the completion of the procurement packages for circuits 855, 912, 915, 940, 941 and 949 only. The completion of the remaining circuits and the construction packages for these six circuits will be completed in FY 26 under a separate proposal.
- The planning and execution of the construction work outage sequence for the structure replacements are the responsibility of JEA and will be performed by others. BMcD's scope includes coordination related to these outages as necessary for design purposes.
- BMcD assumes that current and applicable JEA transmission line standards, including standard framing and hardware specifications, have been developed and will be provided by JEA for utilization in the design of this project. We assume these standards are electrically and structurally suitable for the project's requirements, and additional studies to validate the design criteria within these standards are not included in our scope.
- For estimating purposes, our fee assumes a single review cycle for fabrication drawings and design submittals with JEA. Should additional review cycles be required, this may necessitate an adjustment to the project schedule and fee via a change order.
- BMcD's scope and fee do **not** include the following site-specific activities. It is assumed that JEA will be responsible for obtaining and providing the necessary data:
 - Access road planning and design, including siting and grading activities.
 - Pre- and post-construction LiDAR and deed mapping.
- BMcD has assumed that direct embed foundations will be adequate all structures in the Project. This assumption is based on preliminary information and shall be revisited and confirmed once the geotechnical information (referred to in point 5) is provided by JEA. If the geotechnical data indicates that alternative foundation types or additional structures beyond this assumption require engineering design, this scope can be added via a mutually agreeable change order.
- BMcD's scope and fee do **not** include the development of the following:
 - New or custom hardware assemblies (If needed, we can create hardware specifications and assemblies under a separate agreement or change order).
 - Drawings or plans related to vegetation management.
 - Matting placement drawings and coordination
- BMcD's scope of work does **not** include professional engineering services for detailed electrical studies such as lightning performance, insulation coordination, impedance calculations, conductor selection optimization, grounding analysis, corona effects analysis, fault current analysis, or other similar specialized electrical studies. Our scope **does** include hours for performing necessary Electromagnetic Field (EMF) calculations. Should professional engineering services for additional electrical studies be required, BMcD can submit a separate proposal for those services.
- BMcD has not included a fee for design efforts related to the adjacent structures. In the event that the assessment of adjacent structures determines that modifications or design work is required for these specific structures due to the project's impact, this scope can be added via a mutually agreeable change order.
- The transmission line design approach for this project is based on static loads determined from industry standard practices, industry design manuals (such as the National Electrical Safety Code - NESC), and applicable codes.



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BMcD will **not** perform site-specific wind or structure studies to evaluate the impact of unique site weather conditions on structure motion or the probability of structure and structure component vibration. Similarly, we will not calculate dynamic loads or design for structure or structure component vibration. These types of local dynamic analyses are extremely complex, are outside the scope of work for this assignment, and are not typical industry standards for standard transmission line engineering services.

- The environmental surveys will consist of the 29 pole replacement work locations, including access to the structures.
- Burns & McDonnell assumes access will be granted throughout all areas requiring survey prior to initiating surveys.
- Assumes no species-specific surveys for protected species, Phase I/II Environmental Site Assessment, or purchase of mitigation credits or mitigation design will be required.
- Cultural Resources surveys are not included in this scope of work. Burns & McDonnell will conduct desktop research only and coordinate with the Florida Division of Historical Resources (FDHR) on the desktop findings.
- Permitting effort is not included in this proposal. Permitting is planned for FY 26 and will be provided under a separate proposal.





495 North Keller Road
Suite 300
Maitland, FL 32751
burnsmcd.com



PROPOSAL FOR

Transmission Line Clearance Compliance & Structure Replacement 138/230 kV Project

SUBMITTED TO
JEA

November 19, 2025



November 19, 2025

Mr. Darrell Hamilton
Manager – Transmission & Substation Projects
JEA
225 North Pearl Street Jacksonville, FL 32202

RE: Transmission Line Clearance Compliance & Structure Replacement Project

Dear Mr. Hamilton,

On behalf of Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell), thank you for this opportunity to provide a proposal to provide support for transmission line clearance compliance at various locations within JEA's territory. This proposal outlines the scope of the work we will undertake in support of this project in its entirety.

We are prepared to start work on this exciting project immediately upon your approval. If you have any questions or would like to discuss this further, please feel free to reach out to Randy Koncelik at (321)-249-6472.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Kapusta".

Matthew Kapusta, PE
Director of Operations, Florida
Transmission & Distribution Services
mkapusta@burnsmcd.com

A handwritten signature in black ink, appearing to read "Randy Koncelik".

Randy Koncelik, PMP
JEA Account Manager
Transmission & Distribution Services
Rjkoncelik@burnsmcd.com

Cc:

Sebastian Chmist - Electric System Engineer JEA
Benjamin Garcia - Department Manager Transmission BMCD

1.0 Project Description

JEA had previously requested that Burns & McDonnell (BMcD) prepare a proposal and estimate for transmission line engineering services to support the replacement of twenty-nine (29) transmission line structures throughout their system. During the evaluations on the Fiscal Year 2025 circuits, BMcD determined that additional infringements totaling six (6) transmission line structures and one (1) ADSS span between dead end structures needed mitigation as well. The primary objective of this project is to rectify existing transmission line configurations to ensure compliance with current transmission wire clearance requirements relative to surrounding objects. The specific transmission circuits and the corresponding structures slated for replacement are detailed below:

<u>230kV Replacements</u>	<u>138kV Replacements</u>
Circuit 912 230kV: Structure 157 ABC	Circuit 855 138kV: Structures 4, 25
Circuit 915 230kV: Structures 60, 61, & 65	Circuit 825 138kV: Structures 25, 32
Circuit 940 230kV: Structure 40	Circuit 826 138kV: Structure 14
Circuit 941 230kV: Structures 17, 18	Circuit 830 138kV: Structures 17, 53 or 54 & ADSS between Structures 16 to 18
Circuit 949 230kV: Structures 7, 14, 16, 17, 18, 20, 21, 23	Circuit 831 138kV: Structure 30
	Circuit 832 138kV: Structures 195, 196
	Circuit 839 138kV: Structures 8, 12, 75, 76
	Circuit 844 138kV: Structures 20, 22, 23, 24, 25, 43

All replacement structures will be engineered to accommodate the conductors and equipment currently supported by the existing structures. As part of the project, an assessment of the directly adjacent transmission structures that will remain in service will be conducted to evaluate any potential impacts resulting from the new structure installations. BMcD's scope of work includes the development of structure procurement packages and detailed construction packages for each of the circuits listed above. The final construction sequencing and implementation schedule for the replacement structures are anticipated to be determined by JEA, taking into account system outage requirements, construction crew capabilities, and seasonal considerations.

2.0 Required Information

BMcD has identified key inputs to the engineering design process which must be supplied in a timely manner (as identified below and on the schedule) to meet the delivery dates provided in this proposal. These inputs and decisions are provided by stakeholders outside the immediate control of BMcD and, as such, will necessitate schedule and budget modifications in the event their delivery is delayed. Each of the inputs below apply to the Fiscal Year 2026 Circuits from the previous proposal. These circuits, are 825, 826, 831, 832, & 839. Additionally, there may be additional information required on the Fiscal Year 2025 Circuits. The BMcD team has made every effort to identify such external inputs but acknowledges that additional items may surface during execution of the project. All additional information requests, including impact on cost and schedule, will be coordinated directly with the JEA Engineering Lead.

Information type are as follows and will be required upon award unless otherwise noted:

- Line ampacity values for the transmission and distribution conductors, these values need to be for the same day and hours when the LiDAR was flying for Fiscal Year 2026 Circuits
- Record of proposed cable types for the transmission, distribution, and fiber design as stated by the Owner and PLS-CADD .WIR files for Fiscal Year 2026 Circuits
- All applicable drawings include impacted existing structure, hardware drawings, record design plan & profiles, and construction drawings for Fiscal Year 2026 Circuits
- Post-Construction Survey Data in LiDAR PLS-CADD .bak file format (after project energization)



3.0 Transmission Line Scope of Work and Engineering Approach

The transmission line design for the replacement structures will primarily utilize prefabricated spun concrete structures with direct embed backfill where technically feasible. Our design solution will be developed in accordance with JEA's standard framing and hardware specifications, incorporating concrete spun structures as required. Preliminary engineering investigations will be conducted to confirm the optimal application of utilizing prefabricated structures for each specific replacement location. Regarding the project schedule, it is envisioned that all structure replacements will initially progress under a unified project schedule up to the submittal of the final structure procurement package to JEA. However, if JEA requires any specific structures to be expedited, BMcD can supply procurement packages per circuit. Following this, specific structure replacements can potentially be expedited ahead of others, depending on critical system outage requirements and constraints identified by JEA. Our general engineering approach for this project is outlined below, followed by the proposed JEA standard framing configuration and permitting requirements intended for each replacement structure:

General Engineering Approach

- Design Criteria Document: BMcD will utilize the previously developed project specific design criteria document for all structure replacements, which will outline the design parameters for the project based on industry standards and project specific requirements. This document was approved by the JEA Engineering Lead.
- Structure material assessment/feasibility: BMcD will assess the structure material type, with a preference for prefabricated concrete spun structures.
- Boundary Survey: BMcD will utilize the subcontract boundary survey services of the line sections impacted by the Project. This survey will provide the necessary easement and right-of-way information to begin spotting the proposed structure locations.
- Subsurface Exploration: BMcD will utilize the subcontract subsurface explorations – level B (SUEs) services at the agreed structure spotting locations. The reports provided will be utilized to adjust the transmission line design as required.
- Geotechnical Investigation: BMcD will utilize the geotechnical investigation specification based on JEA design criteria and industry best practices, confirming proposed boring locations with JEA. The results of this investigation will be utilized to develop the correct foundation solution for all structure replacements.
- Electrical Clearance Assessment: This assessment will verify the adequacy of shield wire locations in shielding conductors at specified angles, per JEA design criteria. It will also ensure compliance with NESC electrical clearances. Locations lacking sufficient shielding will be noted for further analysis or mitigation. It is assumed that JEA standard structure framing and hardware assemblies meet the required electrical code and industry standards. Your BMcD team will confirm this assumption before the submission of the final structure procurement package.
- Soil Profile Development and Direct Embed Foundation Design: Our team will review the geotechnical investigation report provided by JEA. Once reviewed, an initial commentary on the investigation will be provided to JEA with highlights on any foreseeable geotechnical challenges. Preliminary soil profiles will be developed for foundation designs. Preliminary direct embed foundation design and drawings will be provided
- Structure Load and Framing Design: Our team will complete the load and framing design of engineered structures. Coordination with the structure manufacturer will commence during this stage of the project. We will review structure manufacturer calculations based on provided BMcD load and framing drawings.
- Easement / ROW Acquisition Support: BMcD will assess cable blowout and provide recommended easement widths needed to meet required JEA transmission line criteria. 30 hours have been included for easement / ROW acquisition support.



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Site Specific JEA Framing Standards & Permitting Support

It is anticipated that all cables will be transferred from the existing structures to the replacement structures and that the following JEA standard framing with prefabricated concrete spun structures will be utilized for the Project. Also listed below are the necessary permits required for construction. Additional permitting details will be provided in a comprehensive report to JEA.

Circuit 912 230 kV: Structure 157ABC

- Two (2) C8244C, 230kV, Double Deadend, 90 Degree, Full tension to Full Tension, 1-Phase
- One (1) C7244C, 230kV, Double Deadend, 90 Degree, Full tension to Full Tension, No Shield, 1-Phase
- Permitting: No permits are anticipated with this circuit and will be confirmed after field surveys are completed.
- Work for this circuit began under the original PO per proposal on 06/02/2025.

Circuit 915 230 kV: Structures 60, 61

- Four (4) C1261, 230kV, Single Braced Line Post, Unguyed, 3-Phase, Modified Horizontal Configuration
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required. This permit will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Field surveys will confirm if any other permits are required. Additional confirmation with JEA regarding wildflower planting area will be confirmed with JEA.
- Two (2) C8244C, 230kV, Double Deadend, 90 Degree, Full tension to Full Tension, 1-Phase
- One (1) C7244C, 230kV, Double Deadend, 90 Degree, Full tension to Full Tension, No Shield, 1-Phase
- Work for this circuit began under the original PO per proposal on 06/02/2025 for structures 60 & 61. Structure 65 was added to the scope after the original PO.

Circuit 940 230 kV: Structure 40

- Two (2) C1261, 230kV, Single Braced Line Post, Unguyed, 3-Phase
- Permitting: Pole and access to pole (temporary matting) is located in a forested wetland. A U.S Army Corps of Engineer Nationwide Permit 57 will likely be required.
- Work for this circuit began under the original PO per proposal on 06/02/2025.

Circuit 941 230 kV: Structures 17, 18

- Two (2) C1261, 230kV, Single Braced Line Post, Unguyed, 3-Phase
- Permitting: No permits are anticipated with this circuit and will be confirmed after field surveys are completed.
- Work for this circuit began under the original PO per proposal on 06/02/2025.

Circuit 949 230 kV: Structures 16, 17, 18, 20, 21 along with spans from Structure 6 to 8, Structure 14 to 15, and Structure 22 to 23

- Eight (8) C2261, 230kV, Double Braced Line Post, Unguyed, 3-Phase
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required. This permit will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Field surveys will



Award #5 Supporting Documents 01/29/2026

confirm if any other permits are required.

- Work for this circuit began under the original PO per proposal on 06/02/2025 for structures 16, 17, 18, 20 & 21. The other structures were added to the scope after the original PO.

Circuit 825 138 kV: Structures 25, 32

- Two (2) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase, Modified With Distribution Underbuild
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required for Structure 25. This permit will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Structure 32 requires a Florida Department of Transportation (FDOT) Utility Permit. Field surveys will confirm if any other permits are required.

Circuit 826 138 kV: Structure 14

- One (1) B1241C, 138kV, Double Deadend, 180 Degree, Full Tension to Full Tension, 3-Phase
- Permitting: No permits are anticipated with this circuit and will be confirmed after field surveys are completed.

Circuit 830 138 kV: Structures 17, 53 (or 54) and ADSS clearances between Structures 16 to 18

- Two (2) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase, Modified With Distribution Underbuild
- Remediate clearance issues with ADSS to ground between Structures 16 and 18
- Permitting: Structure 17 is located on CSX Railroad Property; the encroachment is pending a review of the utility agreement between CSX and JEA. The pole is located in a mapped surface water ditch and may require a Verification of Exemption pursuant to 62-330.051(14)(d), F.A.C. with FDEP. Field surveys will confirm the presence of the ditch and if any other permits are required. Structure 53 will require a City of Jacksonville Right-of-Way (ROW) Permit. This permit will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Structure 53 is less than 5 miles from the Jacksonville International Airport. BMcD will submit the pole coordinates, ground elevation, and maximum height in the Federal Aviation Administration (FAA) Notice Criteria tool. If any of the poles requires to be filed, we would create a case on the FAA system and submit form 7460-2 (part 1 and 2) within 5 days of the poles reaching maximum height. Field surveys will confirm if any other permits are required.
- Work for this circuit began under the original PO per proposal on 06/02/2025. The ADSS clearance mitigation was added to the scope after the original PO.

Circuit 831 138 kV: Structures 30

- Two (2) B1241C, 138kV, Double Deadend, 180 Degree, Full Tension to Full Tension, 3-Phase, Modified Horizontal Configuration
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required. This permit will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Field surveys will confirm if any other permits are required.

Circuit 832 138 kV: Structures 195, 196

- Four (4) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase,
- Permitting: No permits are anticipated with these circuits and will be confirmed after field surveys are completed.



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Circuit 839 138 kV: Structures 8, 12, 75, 76

- Eight (8) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase, Modified Horizontal Configuration
- Permitting: Structures 8 and 12 are located or cross CSX Railroad Property; these encroachments are pending a review of the utility agreement between CSX and JEA. Structure 76 and access to structure (temporary matting) is located in a forested wetland and includes a Section 10 creek crossing. A U.S Army Corps of Engineer Nationwide Permit 57 and an FDEP Verification of Exemption pursuant to 62-330.051(14)(d), F.A.C. will likely be required for pole placement. Structures 75 and 76 are less than 5 miles from the Jacksonville International Airport. BMcD will submit the pole coordinates, ground elevation, and maximum height in the Federal Aviation Administration (FAA) Notice Criteria tool. If any of the poles requires to be filed, we would create a case on the FAA system and submit form 7460-2 (part 1 and 2) within 5 days of the poles reaching maximum height.

Circuit 844 138 kV: Structures 20, 22, 23, 24, 25, 43 (Started under original PO per Proposal on 06/02/2025)

- Six (6) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase, Modified With Distribution Underbuild
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required for all four structures. These permits will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Structures 20, 22, 25, and 43 are less than 5 miles from the Jacksonville International Airport. BMcD will submit the pole coordinates, ground elevation, and maximum height in the Federal Aviation Administration (FAA) Notice Criteria tool. If any of the poles requires to be filed, we would create a case on the FAA system and submit form 7460-2 (part 1 and 2) within 5 days of the poles reaching maximum height. Field surveys will confirm if any other permits are required.
- Work for this circuit began under the original PO per proposal on 06/02/2025.

Circuit 855 138 kV: Structures 4, 25

- Two (2) B1261, 138kV, Single Braced Line Post, Unguyed, 3-Phase, Modified With Distribution Underbuild
- Permitting: A City of Jacksonville Right-of-Way (ROW) Permit will be required for both structures. These permits will be obtained by the Construction Contractor as the City requires a bonded Contractor to obtain ROW Permits. Field surveys will confirm if any other permits are required.

4.0 Transmission Line Deliverables

BMcD will supply the following deliverables based on the provided milestones to JEA:

Structure Procurement Package (Developed per Circuit as Directed by JEA)

- Determination of all wire types
- Determination of structure material type
- Blowout to Edge of Right of Way Assessment
- Finalized PLS-CADD Model with Proposed Structures
- Foundation Design & Drawings
- Structure Procurement Package

Issued for Construction Package (Developed per Circuit as Directed by JEA)

- Subcontract – Level A SUE Survey
- Transmission Line Design Drawing Package
 - Index Drawing
 - Plan and Profiles
 - Plan Detail Drawings
 - Hardware Assembly Drawings
 - Stringing Charts
 - Bill of Materials
- Final Engineering Transmittal



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- Construction Support

The electronic documents, including the PLS-CADD model will be provided to JEA with the issuance of the IFC Package.

5.0 Construction Support

In-Office Construction Support

After issuance of the IFC package, BMcD will remain available to support purchaser/final owner with review of contractor material submittals and technical support required to answer contractor requests for information related to the IFC package. Fifty (50) hours of in-office support have been included in the estimate for these engineering services. During this time, requests for information (RFIs) from the contractor regarding the IFC package will be answered and contractor submittals will be reviewed.

Construction Site Visits

In addition to in-office construction support, BMcD proposes to also conduct a site visit prior to energization. The trip is anticipated to include one day of on-site support, including travel time for up to two engineers.

6.0 Project Management

BMcD's project manager will provide general project administration, budgeting, invoicing, change management, risk assessment and day-to-day management of the BMcD effort.

Project Review Meetings

BMcD has included project review meetings with JEA and key stakeholders as indicated below. These meetings will be held to review submitted deliverables, discuss comments, solicit feedback on each package and discuss the overall project status. Each meeting will be attended by at least two people from BMcD. The following remote team's meetings are proposed, and anticipated to take up to two hours each:

Structure Procurement Package Review Meeting

Issued for Construction Package Review meeting

Project Status Meetings

BMcD will attend a bi-weekly, one-hour conference call with the JEA project team to discuss progress, action items and issues for the duration of project work. BMcD attendance for this meeting will include the project manager and engineering leads.

It is expected that miscellaneous additional conference calls will be required throughout the course of the project. BMcD has allocated an additional four man-hours per month, as a level of effort for this item throughout the proposed project duration.

7.0 Permitting

BMcD will identify and obtain the required permits for the project. As part of the Environmental Desktop Report from the original proposal per the PO on 06/02/2025, BMcD developed a permit matrix detailing information on each required permit or clearance, associated triggers, the permitting agency, the name and contact information for the agency representative, and requirements related to each permit.

BMcD anticipates the project will require the following consultations and/or permit authorizations from Federal, State, and Local agencies based on initial review:

Federal Permits

- **USACE Section 404 of the Clean Water Act/Section 10 of the Rivers and Harbors Act of 1899**
 - o There is a U.S. Army Corp of Engineers (USACE) Section 10 crossing between Structures 839/76 and 839/75 (Little Cedar Creek). BMcD anticipates the project would qualify for a Nationwide Permit 57 with a Pre-Construction Notification (PCN) and a separate Section 10 permit for this creek crossing.
- **USFWS Endangered Species Act (ESA) Threatened and Endangered Species Consultation**



Award #5 Supporting Documents 01/29/2026

- o UACE Section 10 would trigger this consultation to be completed. No USFWS critical habitat identified in the Study Area. Per the August 7th, 2025 survey, no Eastern Indigo Snakes were observed, but marginal habitat exists.

- **CSX Rail**

- o Structures 830/17, 839/008, and 839/012 encroach or cross CSX Rail ROW. BMcD will work with JEA to determine if these encroachments/crossings are under an existing agreement. If the crossing is under an agreement, we will support the outside party (OP) request through the CSX portal to schedule. We have included costs for the agreement research and coordination with CSX and JEA. If a utility permit is required due to the activity not covered under any specific agreement, we would discuss this with JEA on next steps and provide a separate cost estimate.

- **Federal Aviation Administration**

- o There are several pole replacements that are within 5 miles of Jacksonville International Airport. BMcD will submit the pole coordinates, ground elevation, and maximum height in the Federal Aviation Administration (FAA) Notice Criteria tool. If any of the poles requires to be filed, we would create a case on the FAA system and submit form 7460-2 (part 1 and 2) within 5 days of the poles reaching maximum height.

State Permits

- **Florida Department of Environmental Protection**

- o BMcD anticipates the project would be exempt from needing an Environmental Resource Permit (ERP) based on Rule 62-330.051(14)(d), F.A.C. We will submit a Verification of Exemption Request to FDEP as part of our due diligence for the project.

- **Florida Department of Transportation Utility Permit**

- o The Florida Department of Transportation (FDOT) will issue permits for the construction, alteration, operation, relocation, removal, and maintenance of utilities upon the right of way in conformity with the FDOT Utility Accommodation Manual (UAM), 2017. Structures 825-32 and 839-75 encroach into FDOT ROW and will require a utility permit.

- **Florida Fish and Wildlife Conservation Commission Threatened and Endangered Species Review and Authorization**

- o Seven gopher tortoise burrows were identified in the Study Area at Structures 949-16 and 18. Currently, no gopher tortoise burrows are within 25 feet of construction. Surveys will need to be redone prior to construction. If any active gopher tortoise burrows within 25 feet of proposed work from the re-survey, a FWC relocation permit must be obtained. BMcD has not provided gopher tortoise permitting costs as it is not known whether a permit will be required based on the re-survey efforts.

- **Florida Division of Historical Resources Section 106**

- o Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their undertakings on historic properties before proceeding. The State Historic Preservation Officer (SHPO) plays a key role in this process at the state level. When a federal project may affect historic resources, the agency must consult with the SHPO to assess potential impacts on properties listed or eligible for listing on the National Register of Historic Places.



Local Permits

- **City of Jacksonville Right-of-Way Permit**
 - o A Right of Way permit (ROW permit) is required to disturb, excavate, block, obstruct, tamper with or place any construction or other material on or in a city road, right of way, or easement (Section 744.110 Ordinance Code). The City of Jacksonville requires a bonded Company that will be doing the construction to obtain the ROW permit. For purposes of this proposal, BMcD did not include costs for obtaining this permit.

8.0 Project Schedule and Estimate – Transmission Line and Project Management

The estimated schedule for the transmission line project is illustrated in the table below. A detailed schedule will be provided for each circuit upon start of the project.

SCOPE	DATE
Project Start	November 2025
Structure Procurement Package Submittal	2026 Fiscal Year
Issue for Construction Package Submittal	2026 Fiscal Year
Construction Bid & Award	2026 Fiscal Year
Construction Start	2026 Fiscal Year
Construction Finish	2026 Fiscal Year

The estimated cost for the transmission line project scope identified in this proposal is illustrated in the table below.

SCOPE	FEE
Transmission Line Engineering – Structure Procurement Package	\$320,524.75
Transmission Line Engineering – Issue for Construction Packages	\$320,524.75
Environmental Support – Structure Procurement Package	\$6,050.00
Project Management	\$30,250.00
Permitting Support	\$36,935.44
Travel and Expenses	\$1,540.00
TOTAL FEE: \$715,824.94	



Award #5 Supporting Documents 01/29/2026

Additional estimated costs for survey and geotechnical investigation subcontracts are illustrated in the table below. These costs are estimated with the total invoiced amount being at actual cost.

SCOPE	FEE
Geotechnical Investigation Subcontract	\$25,105.00
Survey Subcontract – Level B SUE & Boundary Survey	\$31,200.00
TOTAL FEE: \$56,305.00	



8.1 Assumptions, Clarifications and Exceptions

- This proposal outlines the complete scope of the transmission line engineering services that BMcD will provide in support of this project. Any modifications, additions, or deletions to this scope will be formally processed and executed through a mutually agreeable change order.
- This proposal includes fee for the environmental survey work, SUE Level B survey, boundary survey, geotechnical investigation, and design effort for the completion of the procurement packages for the additional scope in circuits 844, 915, and 949. These costs are estimates and will be invoiced at the actual cost. It is assumed that for each structure being replaced as part of the additional cost will need site specific geotechnical investigation and survey.
- The planning and execution of the construction work outage sequence for the structure replacements are the responsibility of JEA and will be performed by others. BMcD's scope includes coordination related to these outages as necessary for design purposes.
- BMcD assumes that current and applicable JEA transmission line standards, including standard framing and hardware specifications, have been developed and will be provided by JEA for utilization in the design of this project. We assume these standards are electrically and structurally suitable for the project's requirements, and additional studies to validate the design criteria within these standards are not included in our scope.
- For estimating purposes, our fee assumes a single review cycle for fabrication drawings and design submittals with JEA. Should additional review cycles be required, this may necessitate an adjustment to the project schedule and fee via a change order.
- **Site Data and Investigations:** BMcD's scope and fee do **not** include the following site-specific activities. It is assumed that JEA will be responsible for obtaining and providing the necessary data:
 - Access road planning and design, including siting and grading activities.
 - Pre- and post-construction LiDAR and deed mapping.
- **Foundation Design Assumption:** BMcD has assumed that direct embed foundations will be adequate all structures in the Project. This assumption is based on preliminary information and shall be revisited and confirmed once the geotechnical information (referred to in point 5) is provided by JEA. If the geotechnical data indicates that alternative foundation types or additional structures beyond this assumption require engineering design, this scope can be added via a mutually agreeable change order.
- **Exclusions - Design Elements & Studies:** BMcD's scope and fee do **not** include the development of the following:
 - New or custom hardware assemblies (If needed, we can create hardware specifications and assemblies under a separate agreement or change order).
 - Drawings or plans related to vegetation management.
 - Matting placement drawings and coordination (If professional services for this are required, BMcD can submit a separate proposal).
- **Exclusions - Electrical Studies:** BMcD's scope of work does **not** include professional engineering services for detailed electrical studies such as lightning performance, insulation coordination, impedance calculations, conductor selection optimization, grounding analysis, corona effects analysis, fault current analysis, or other similar specialized electrical studies. Should professional engineering services for additional electrical studies be required, BMcD can submit a separate proposal for those services.
- **Adjacent Structure Design Exclusion:** BMcD has not included a fee for design efforts related to the adjacent structures. In the event that the assessment of adjacent structures determines that modifications or design work is required for these specific structures due to the project's impact, this scope can be added via a mutually agreeable change order.



Award #5 Supporting Documents 01/29/2026

- **Transmission Line Design Methodology:** The transmission line design approach for this project is based on static loads determined from industry standard practices, industry design manuals (such as the National Electrical Safety Code - NESC), and applicable codes. BMcD will **not** perform site-specific wind or structure studies to evaluate the impact of unique site weather conditions on structure motion or the probability of structure and structure component vibration. Similarly, we will not calculate dynamic loads or design for structure or structure component vibration. These types of local dynamic analyses are extremely complex, are outside the scope of work for this assignment, and are not typical industry standards for standard transmission line engineering services.
- **Environmental Surveys**
 - Survey efforts will be conducted for the estimated five (5) pole replacements as part of the additional scope on Circuits 844 & 949.
- **Permitting**
 - The project will require consultations and authorization from the USACE, FDEP, USFWS, FWC, FDOT, FAA, and CSX. Any permits or authorization not included in this proposal will be provided to JEA as a change request.
 - Costs for the City of Jacksonville Right of Way Permit are not included in our scope. The City requires a Bonded Company to submit permits which is typically done by the Construction Contractor.
 - Costs for gopher tortoise permitting have not been included in our costs. During re-survey efforts, if gopher tortoises and/or burrows are encountered and will impact construction, we will provide a separate scope and cost.
 - Assumes that the project will not exceed one-acre of land disturbance and a National Pollutant Discharge Elimination System (NDPES) Construction Generic Permit (CGP) will not be required. BMcD would recommend placing sediment/erosion control BMPs in wetland areas to prevent sediment discharge.
 - Since it is not known at this time if JEA has an existing agreement with CSX on the rail encroachments and crossings, we have included costs for coordination and review with CSX and JEA only. In the event that a utility permit is required, we will notify JEA and provide a change request.
 - We assume that a FDOT standard index traffic control plan will be sufficient for the FDOT permit and no detailed traffic control plan will be required.
 - JEA will be provided, for one iteration of review and comment, a draft copy of all letters and applications to agencies prior to submittal. Application packages will only be submitted upon approval of JEA.
 - Assumes all permit fees will be paid by JEA.
 - Assumes one round of Request for Additional Information (RAIs) from respective agencies
 - No public involvement or stakeholder management services are included in our scope of work. If requested, we can provide these services.
 - Due to the Government shutdown, there may be delays from Federal Agencies in issuing permits. BMcD will notify JEA of any permit schedule conflicts early in the permitting process.





495 North Keller Road
Suite 300
Maitland, FL 32751
burnsmcd.com

Award #5 Supporting Documents 01/29/2026**UTILITY WORK ESTIMATE****FDOT PROJECT INFORMATION**

Financial Project ID: 442778-1-56-02	Federal Project ID: NA
State Road Number: SR 9	County: Duval
FDOT Plans Dated: 4/30/2025 90%	District Document No.: 1

UTILITY AGENCY/OWNER (UAO)

Utility Company: JEA Electric Transmission	Job No. or Work Order No.:
UAO Project Rep: Jonathan Maywood	Phone: 904-229-7848 E-mail: maywjw2@jea.com
UAO Field Rep:	Phone: E-mail:

SECTION A: ITEMIZED COST ESTIMATE

Item	Item Cost (\$)	Overhead (%) (Must use "%" or ".," i.e. 10% or .10)	Item Cost + Overhead (\$)
Preliminary Engineering			0
Right of Way Acquisition			0
Construction Engineering			0
Construction Labor			0
Materials and Supplies	\$1,012,704.00	0%	\$1,012,704.00
Transportation & Equipment			0
Contract Construction			0
Miscellaneous Expenses			0
Total Cost Estimate =>			\$1,012,704.00

SECTION B: DEDUCTIONS

Item	Item Value (\$)
Salvage Value	
Betterment	
Extended Service Life	
Total Deductions =>	0

SECTION C: REIMBURSEMENT

Total Cost Estimate from SECTION A =>	\$1,012,704.00
Total Deductions from SECTION B =>	0
Total Reimbursement* =>	\$1,012,704.00

*Update the estimated Total Reimbursement for changes in excess of 10%

UTILITY SIGNATURE

UAO Rep. <u>Jonathan Maywood</u> Name <u>Jonathan Maywood</u> Title <u>Electric Systems Engineer</u>	Digitally signed by Jonathan Maywood Date: 2025.12.30 13:53:35 -05'00' Date <u>12 / 30 / 2025</u>



CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Miller - Solar Interconnection (PO 226904) BMcD Project No. 173283
 Client: JEA Client Project No. 8009607
 Engineer: Burns & McDonnell Contract No. JEA11972

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

Scope of Work additions as directed by client which include:

1. The original proposal included installation of a revenue metering panel and associated drawing modifications, based on the assumption that JEA would provide standard specifications for CT/PT combination units. However, due to the absence of upfront rating information, an unanticipated coordination effort with the metering team was required to finalize equipment parameters.
2. The integration of a PQ meter and an unanticipated SEL-3350 into the revenue metering panel required additional effort and significant layout modifications to maintain consistency with other panel designs. These additions deviated from BMcD's original assumption that standalone PMUs and PQ devices would not be needed. The APP-601 DFR subunits were expected to fulfill PMU functions per the Mayo Substation standard, but the PQ Meter must be a standalone device.
3. BMcD originally anticipated a single review cycle per IFR package, with JEA providing comments to be incorporated before issuing the IFA. The 30% submission underwent multiple rounds of feedback, some of which occurred after approval to proceed with the 60% design, resulting in moderate revisions to the in-progress 60% package. The inclusion of an Axion device, not part of the initial scope, prompted extensive correspondence and was ultimately deemed unnecessary. A shift from the SEL-3555 to the SEL-3350 on the integration panel required updates to approximately twenty prints, relocating IED connections from RJ45 to serial ports. The removal of Ethernet switches and installation of an SEL-2902 also impacted cable naming conventions previously based on the Mayo standard. Additionally, JEA requested the internal wiring of an additional (future) SEL-451 relay on the 25/BF panel, which was not originally planned. Point-to-point wiring validation was necessary to address issues with the go by design.
4. BMcD was originally instructed to use the Mayo Substation as the reference for the Greenfield drawing set. During the 90% IFR review, JEA requested a shift to the Normandy drawings, prompting a change in direction. This required the team to reproduce and reassess ten prints.

As a result of the modification(s) described above:

The revised Contract Price is:

Original Contract Price	\$ 404,461
Total net amount of all previous Change Orders	(+ or -). \$ 0
Total net amount of all previous variable quantity adjustments	(+ or -). \$ 0
Total net amount of this Change Order	(+ or -). \$ 39,269
Current Contract Price, including this Change Order	\$ 443,730



01-05-15 Form CO-1

The revised **Contract Time** is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	<u>3/15/2025</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders(+ or -)	<u>N/A</u>	<u>N/A</u>
Total net time adjustment* of this Change Order.....(+ or -)	<u>15</u>	<u>N/A</u>
* Time adjustment is specified in: ☒ Working Days ☐ Calendar Days ☐ Other		
Current Completion Date(s), including this Change Order	<u>3/30/2025</u>	<u>N/A</u>

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.

This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By _____

By Randolph Koncelik

Date _____

Date 01/07/2026



01-05-15 Form CO-1

CHANGE ORDER NO. 2
For Contract between Client and Burns & McDonnell

Project Name: Miller Solar PV Substation Design BMcD Project No. 173283
 Client: JEA Client Project No. 8009570
 Engineer: Burns & McDonnell Contract No. 11972

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

Project Controls (Scheduling) Support - Scope of Work:

- Developing and maintaining a fully integrated project schedule with monthly updates.
- Identifying and tracking critical path activities and interdependencies.
- Obtain input from JEA stakeholders on potential project risks and document in a project specific risk register.
- **Project control support total cost: \$25,000**

Project Controls (Scheduling) Support - Deliverables:

- Integrated project schedule (updated monthly).
- Compile project risks as identified by project stakeholders (updated monthly)

Substation Detailed Design Changes - Scope of Work:

- Fiber cut-in design changing to use existing splice enclosure per JEA Telecom request.
 - **Fiber design change cost: \$3,000**
- Changing fence design to include privacy slats per JEA Security request.
 - **Fence design change cost: \$4,000**
- Substation drive path change from asphalt to crushed rock with geoweb per PM request.
 - **Drive Path design change cost: \$2,000**

Substation Detailed Design Changes - Deliverables:

- Updates to Conduit Plan, Conduit Details and BOM for Fiber cut-in design change.
- Fence loading calcs, updates to fence details, fence grounding details, BOM and Specifications for fence privacy slats.
- Updates to Drive Path Plan and BOM for substation drive path change from asphalt to crushed rock with geoweb.

As a result of the modification(s) described above:

The revised **Contract Price** is:

Original Contract Price	\$ 415,460
Total net amount of all previous Change Orders	(+ or -) \$ 55,000
Total net amount of all previous variable quantity adjustments	(+ or -) \$
Total net amount of this Change Order	(+ or -) \$ 34,000
Current Contract Price, including this Change Order	\$ 504,460

The revised **Contract Time** is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	N/A	N/A
Total net time adjustment* of all previous Change Orders(+ or -)	N/A	N/A
Total net time adjustment* of this Change Order	N/A	N/A



01-05-15 Form CO-1

* Time adjustment is specified in: ☒ Working Days ☐ Calendar Days ☐ Other N/A

Current Completion Date(s), including this Change Order 1/13/2026 (IFC) N/A

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.

This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.

CLIENT

BURNS & McDONNELL

By Darrell Hamilton

By Randolph Koncelik

Date 1/8/2026

Date 1/8/2026



01-05-15 Form CO-1

CHANGE ORDER NO. 1
For Contract between Client and Burns & McDonnell

Project Name: Northside Gen - GSU TG1 Temp Tie Project BMCD Project No. 188644Client: JEA Client Project No. P.O. 223130Engineer: Burns & McDonnell Contract No. JEA11972

The below noted modification(s) to subject Contract are directed by Client and accepted by Burns & McDonnell (any applicable attachments are specifically identified):

1. Additional engineering a design services required as a result of obstruction identified at the foundation locations necessitating moving of structures multiple times on the east and west structures. This resulted in additional foundation designs, as well as updated construction packages
2. Development of Geotechnical Specification for use in obtaining additional Geotechnical data.
3. Development of SUE Survey Specification for use in identifying underground interferences with design.
4. Development of decision-making flow chart for JEA use in aligning stakeholder expectations.

Note: Design effort is on hold. No additional Work is contemplated in this change order as of 10/23/25

As a result of the modification(s) described above:

The revised Contract Price is:

Original Contract Price	\$ 86,000
Total net amount of all previous Change Orders	(+ or -). \$ 0
Total net amount of all previous variable quantity adjustments	(+ or -). \$ 0
Total net amount of this Change Order	(+ or -). \$ 14,933
Current Contract Price, including this Change Order	\$ 100,933

The revised Contract Time is:

	<u>Substantial Completion</u>	<u>Ready for Final Payment</u>
Original Completion Date(s)	<u>10/15/2025</u>	<u>N/A</u>
Total net time adjustment* of all previous Change Orders(+ or -)	<u>N/A</u>	<u>N/A</u>
Total net time adjustment* of this Change Order	<u>N/A</u>	<u>N/A</u>
* Time adjustment is specified in: ☒ Working Days ☐ Calendar Days ☐ Other <u>N/A</u>		
Current Completion Date(s), including this Change Order	<u>10/15/2025</u>	<u>N/A</u>

The price and/or time extension set forth in this Change Order is full compensation for all costs and delays, direct and indirect, incurred in connection with the conditions giving rise to this Change Order, the work specified herein, and any consequential costs, delays, or effects on unchanged work resulting therefrom.

This Change Order, when executed, constitutes a modification to the Contract and all provisions of the Contract, except as modified above and by any previous Change Orders, shall apply hereto.



01-05-15 Form CO-1

CLIENT

BURNS & McDONNELL

By Darrell Hamilton

By Randolph Koncelik

Date _____

Date _____

SALES REPRESENTATIVE Electric Sales Associates, 954-385-8885		CUSTOMER REQUEST NO. Burns & McDonnell		REQUEST DATE 10/08/2025	EXPIRATION DATE 02/01/2026
PRICE TERMS Escalation/De-Escalation		F.O.B. FOB Factory	FREIGHT PAYMENT Prepaid & Allowed	PAYMENT TERMS **TBD**	
CUSTOMER (000704-000) Burns & McDonnell * Jacksonville, FL 32221			SHIP TO (000704-000) Burns & McDonnell * Jacksonville, FL 32221		
ITEM	QUANTITY	PRODUCT NUMBER / DESCRIPTION		UNIT PRICE	EXTENSION (\$)
001	6,000 Ft	199C69-J2100001 Kerite. Power Cable, 69kV, SPS 100% TX Insulation Thickness. 2000 KCMIL Compressed Round Non Filled Copper SD Temper 127 X, Single Conductor, 0.024 Permashield Conductor Shield Material, 0.650 DR-EPR Insulation, 0.040 Extruded Thermoset Semicon Layer Insulation Shield, BC Shield Material - 24 Wire 9 AWG Concentric Neutral Shield, 0.140 Linear Low Density Polyethylene Jacket, Hot Foil Print. 3.642 Target OD.SOS(Per Sales Order). *Current manufacturing lead time: 20 weeks ARO, subject to reconfirmation at time of order entry *Order quantity required as quoted. 6,000ft MOQ acceptable for this. *Tolerance of -0% +10% quoted *Change in cut lengths may cause a change in pricing *This quote and any subsequent purchase order is subject to metals adjustment and any compound increases received after the purchase order date. Metals will be adjusted at time of shipment based on the previous month's averages published in Platt's Metals Week. The metals adjustment will be shown as a separate line item at time of invoice. *Please note, steel reel price is not included in per foot pricing; please reference steel reel policy included on this quote for pricing and return information		150.6900 Ft	904,140.00

SALES REPRESENTATIVE Electric Sales Associates, 954-385-8885		CUSTOMER REQUEST NO. Burns & McDonnell		REQUEST DATE 10/08/2025		EXPIRATION DATE 02/01/2026	
PRICE TERMS Escalation/De-Escalation		F.O.B. FOB Factory		FREIGHT PAYMENT Prepaid & Allowed		PAYMENT TERMS **TBD**	
CUSTOMER (000704-000) Burns & McDonnell * Jacksonville, FL 32221				SHIP TO (000704-000) Burns & McDonnell * Jacksonville, FL 32221			

ITEM	QUANTITY	PRODUCT NUMBER / DESCRIPTION	UNIT PRICE	EXTENSION (\$)	
002	3 Ea	COMMODITY Copper	PRICE 5.0196 / Lbs		
		REQUESTED DELIVERIES			
		DELIVER BY NOT BEFORE	QUANTITY		
		04/24/2026	6,000		
		REEL			
		DELIVER BY #CTNS QUANTITY UM DESCRIPTION			
		Will Advise 3 2000 Ft REEL ST 108.0 X 64.0 X			
		60.0 X 72.0 Wide Regular			
		-0% +10%			
		M60393	Incl.		
Pulling Eye 2000.0 KCMIL Compressed Round Single Conductor Factory Applied					
MPS# PS 235 REV 9					
TOTAL			904,140.00		
RETURNABLE REEL POLICY Full credit will be issued for reels returned within 12 months, one-half credit for reels returned between 12 months and 18 months, and no credit thereafter. Credit will be reduced for necessary repair costs. Returnable reel charge: \$5,500 each Freight: Reels must be returned prepaid by the customer. The customer arranges for the pick-up/return of the reels with a trucking company of their choice. -Note that our standard product offering is the unique Kerite Discharge Resistant design which may not conform entirely with your specification. -Written confirmation from the customer is required that the cable construction quoted is acceptable. * Compound Adjustment:					

SALES REPRESENTATIVE Electric Sales Associates, 954-385-8885		CUSTOMER REQUEST NO. Burns & McDonnell		REQUEST DATE 10/08/2025		EXPIRATION DATE 02/01/2026	
PRICE TERMS Escalation/De-Escalation		F.O.B. FOB Factory		FREIGHT PAYMENT Prepaid & Allowed		PAYMENT TERMS **TBD**	
CUSTOMER (000704-000) Burns & McDonnell * Jacksonville, FL 32221				SHIP TO (000704-000) Burns & McDonnell * Jacksonville, FL 32221			
ITEM	QUANTITY	PRODUCT NUMBER / DESCRIPTION		UNIT PRICE	EXTENSION (\$)		
When an industry-wide compound price increase occurs, Marmon Utility LLC (Hendrix-Kerite) will provide documentation of the increase amount and the effect on each item as it relates to the cable price. This quote and any subsequent purchase order is subject to metals adjustment and any compound increases received after the purchase order date. Metals will be adjusted at time of shipment based on the previous month's averages published in Platt's Metals Week. The metals adjustment will be shown as a separate line item at time of invoice. Compound adjustments will be made to the base price and reflected on the invoice. * Please note, if a PO is received from this quote a full credit review will be required for PO acceptance * GENERAL ORDER COMMENTS: IMPORTANT- PLEASE NOTE THIS QUOTE/ORDER IS SUBJECT TO THE FOLLOWING ADDITIONAL TERMS & CONDITIONS: The reel tolerance specified is also the order shipping tolerance. Footage in excess of the purchase order quantity but within the reel and order tolerances will be invoiced and is payable. Kerite product will be manufactured with a thermoset insulation shield Kerite High Voltage Cable will be manufacture and tested in accordance with Kerite Standards referencing ICEA S-108-720. The cable meets the intent of the standard for quality and longevity as shown in our cable warranty. Prices are based on the preceding month's average published price for MW US Transaction aluminum ingot per pound and Comex HG 1st Pos copper per pound as published each month in the McGraw Hill publication "Metals Week". In the event of changes in the base metal prices, all quoted prices and unshipped order balances will be adjusted at the time of shipment, based on the preceding month's average price, to reflect a change in the price of the finished product. ***** Quoted By: Clariz Maillet							

SALES REPRESENTATIVE		CUSTOMER REQUEST NO.	REQUEST DATE	EXPIRATION DATE
Electric Sales Associates, 954-385-8885		Burns & McDonnell	10/08/2025	02/01/2026
PRICE TERMS	F.O.B.	FREIGHT PAYMENT	PAYMENT TERMS	
Escalation/De-Escalation	FOB Factory	Prepaid & Allowed	**TBD**	
CUSTOMER (000704-000)		SHIP TO (000704-000)		
Burns & McDonnell		Burns & McDonnell		
*		*		
Jacksonville, FL 32221		Jacksonville, FL 32221		
ITEM	QUANTITY	PRODUCT NUMBER / DESCRIPTION	UNIT PRICE	EXTENSION (\$)
(cmaillet@marmonutility.com)				
TEL (603) 249-1294				
FAX (603) 249-1367				
TERMS & CONDITIONS OF SALE				
1. ENTIRETY. These Terms and Conditions of Sale and all documents referenced herein (collectively, the "Terms") are the only terms and conditions which govern the sale of goods ("Goods") and/or services ("Services" and together with Goods, the "Deliverables") by Marmon Utility LLC ("Seller") to the buyer ("Buyer") and supersede all other terms and conditions, oral or written, and all other communications between the parties suggesting additional or different terms. These Terms represent the final and complete understanding of the parties and may be amended or cancelled only by mutual written agreement. Acceptance is expressly limited to these Terms. Any proposal for additional or different terms or any attempt by Buyer to vary these Terms is hereby deemed material and is objected to and rejected. No terms of any document or form submitted by Buyer shall be effective to alter or add to these Terms. The earlier of Seller's commencement of performance or Buyer's receipt of any of the Deliverables shall constitute acceptance of these Terms.				
2. PRICES. Prices quoted, including delivery terms, are in U.S. Dollars and based on the price at the time of quotation and are subject to change without notice. Clerical errors are subject to correction without liability. The minimum invoice charge (Invoice MOQ) is \$500 except for Hendrix Aerial Cable Systems, which has an Invoice MOQ of \$1,000.				
3. TAXES. Prices do not include any sales, use, excise, privilege, ad valorem, or other taxes, duties, tariffs or assessments now or hereafter imposed or levied ("Taxes") by or under the authority of any foreign, federal, state, provincial, or local law, rule, or regulation (collectively, "Law") concerning the Deliverables or the manufacture or sale thereof. If Seller pays any such Taxes, Buyer shall, upon demand, immediately reimburse Seller for such amounts.				
4. TERMS OF PAYMENT. All payments are due within 30 days from date of invoice. Orders are subject to acceptance in writing by Seller. All payments shall be made without abatement, deduction, discount or setoff. Late payments are subject to a service charge of the lesser of 1.5% per month or the highest rate permitted under applicable Law. Buyer shall be liable for all costs and expenses related to collection of past due amounts, including, without limitation, attorneys' fees and costs. As collateral security for the payment of the Goods, Buyer hereby grants to Seller a lien on and security interest in and to all right, title and interest of Buyer in the Goods, wherever located, and whether now existing or hereafter arising or acquired from time to time, and in all accessions thereto and replacements or modifications thereof, as well as all proceeds (including insurance proceeds). This security interest constitutes a purchase money security interest under the UCC. Upon demand, Buyer shall pay all costs and expenses with respect to the administration and enforcement of the foregoing security interest. If, in Seller's judgment, the financial condition of Buyer does not justify continuance on the terms of payment above, Seller may require full or partial payment in advance or otherwise adjust the terms including ceasing to supply Buyer.				
5. DELIVERY. Delivery shall be made FOB shipping point at Seller's facility and title and risk of loss passes to Buyer at such time. Delivery/performance dates are estimates only. Seller shall not be liable for any claim, loss, expense, or damage of any kind whatsoever for delays, or loss or damage in transit. Claims for loss or damage shall be made solely against the carrier. Seller may, in its sole discretion, without liability or penalty, make partial shipments of Goods to Buyer. Each shipment will constitute a separate sale, and Buyer shall pay for the units shipped whether such shipment is in whole or partial fulfillment of Buyer's purchase order. Shipments invoiced in at or below the minimum quantity (Shipping MOQ) are sold FOB shipping point, freight prepaid and allowed, where within the continental United States. Shipments less than the Shipping MOQ are sold FOB shipping point, with shipping and handling charges added to the invoice. Shipping MOQs are below.				
Product Lines		Shipping MOQ		
Hendrix Aerial Cable Products		\$1,000		
Hendrix Molded Products		\$4,000		
Hendrix Aerial Cable		3,000 feet		
High Voltage Kerite Power Cable		3,000 feet		
Medium Voltage Kerite & Hendrix Power Cable		5,000 feet		
6. INSPECTION. Buyer shall inspect the Goods upon receipt and Services upon performance, and Buyer shall immediately notify Seller in writing of any claims that the Deliverables are different than identified in Buyer's purchase order whereupon Seller shall determine the remedy pursuant to Section 12. Failure to give such written notice upon receipt will constitute irrevocable acceptance by Buyer of all Deliverables.				
7. CHANGES OR CANCELLATION. Changes in specifications or designs to any Deliverables, changes in delivery or performance schedules or reschedules or cancellations of orders are not permitted unless Seller has accepted same in writing, has determined the additional charge to be made, if any, and the same has been				

SALES REPRESENTATIVE		CUSTOMER REQUEST NO.		REQUEST DATE	EXPIRATION DATE
Electric Sales Associates, 954-385-8885		Burns & McDonnell		10/08/2025	02/01/2026
PRICE TERMS		F.O.B.	FREIGHT PAYMENT		PAYMENT TERMS
Escalation/De-Escalation		FOB Factory	Prepaid & Allowed		**TBD**
CUSTOMER (000704-000)			SHIP TO (000704-000)		
Burns & McDonnell			Burns & McDonnell		
*			*		
Jacksonville, FL 32221			Jacksonville, FL 32221		
ITEM	QUANTITY	PRODUCT NUMBER / DESCRIPTION		UNIT PRICE	EXTENSION (\$)
paid by the Buyer. Once ordered, deliverables that are made to order, discontinued or custom products ("Special Order Goods") may not be cancelled by Buyer. Seller reserves the right to cancel any purchase orders or releases thereunder, or terminate any agreement relating to purchase of Seller's Deliverables, upon 10 days' notice to Buyer. A minimum charge of 20% of the sales price will be paid by Buyer for cancellations of goods scheduled for fabrication 90 days or more subsequent to the date Seller receives notice of cancellation. A minimum charge of 50% of the sales price will be paid by Buyer for cancellation of goods scheduled for fabrication 90 days subsequent to the date Seller receives notice of cancellation.					
8. RETURNS. Goods may not be returned without prior written authorization of Seller and compliance with Seller's return policies and procedures then in effect.					
9. STORAGE. In the absence of agreed shipping dates, Seller may invoice Buyer and ship the Deliverables once they are ready for shipment. If, because of Buyer's inability to take delivery on a mutually agreed delivery date, the Deliverables are not shipped, stopped in transit or returned, Seller may store them for Buyer at Buyer's expense and title and risk of loss shall pass to Buyer when the Deliverables are placed in storage and such date shall constitute the date of shipment for purposes of beginning the warranty and payment periods.					
10. SERVICE TERMS. (a) Services will be provided at Seller's then current service rates; (b) If the site is not prepared for the Services upon Seller's arrival, Seller may charge a service fee and for any delay and/or travel time; (c) Buyer shall provide Seller with advance notice of any rules, requirements and Laws; (d) Seller may refuse, without any liability, to provide Services and to allow Seller service personnel to suspend Services or vacate any site where, in Seller's opinion, provision of Services would pose a risk to the safety of any person. In such event, Buyer is responsible for payment of any delay and/or travel time at Seller's regular service rates; (e) Buyer is solely liable for all damages or injuries caused or contributed to by Buyer that may occur; and (f) Buyer must provide at least 72 hours' notice of cancellation of any Service order. If Buyer cancels with less than 72 hours' notice, Buyer is responsible for any costs incurred by Seller caused by such cancellation.					
11. INSURANCE. Buyer shall, at its own expense, maintain and carry insurance in full force and effect which includes, but is not limited to, commercial general liability (including product liability) in a sum no less than \$2 million per occurrence, \$2 million products-completed operations aggregate and \$2 million general aggregate with insurance carriers having an AM Best rating of "A- VIII" or better. Upon Seller's request, Buyer shall provide Seller with a certificate of insurance from Buyer's insurer evidencing the insurance coverage specified in these Terms. Buyer shall provide Seller with 30 days' advance written notice in the event of a cancellation or material reduction of coverage in Buyer's insurance policy. Except where prohibited by law, Buyer shall waive, and shall require its insurer to waive, all rights of subrogation against Seller's insurers and Seller.					
12. LIMITED WARRANTIES. Unless otherwise provided by Seller in its written warranty or in the table below, Seller warrants that (i) Goods designed and manufactured by Seller will be free from defects in material and workmanship for a period of twelve (12) months after shipment; and (ii) Services will be performed in a timely and competent manner in accordance with industry standards. THESE ARE SELLER'S ONLY WARRANTIES. SELLER DISCLAIMS ALL OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING, WITHOUT LIMITATION, THE IMPLIED WARRANTIES OF MERCHANTABILITY, NON-INFRINGEMENT AND FITNESS FOR A PARTICULAR PURPOSE. If during the warranty period, Buyer notifies Seller in writing that the Deliverables are not in conformity with the warranty and Seller agrees, after Seller's inspection (at its option), then: (a) for Goods, Seller will repair, replace or refund the total amount received by Seller therefor, at its sole option, provided Buyer returns such Goods to Seller's plant for inspection; and (b) for Services, Buyer's sole remedy is for Seller, at its sole option, to re-perform the Services or credit Buyer's account therefor. These shall be Buyer's exclusive remedies for Seller's liability. Any claims not made during the warranty period are deemed waived. Seller's warranty does not attach to Deliverables or parts not manufactured by Seller. Any contract created between Seller and Buyer is subject to the specific conditions that (a) Seller is not obligated to provide insurance or indemnify Buyer, and (b) there are no flow-downs from any person or entity including the federal government that become part of the contract. Upon the occurrence of any event described in Section 14(e)(i), (vi) without the prior written consent of Seller, this warranty shall be void. If Goods fail electrically while in service, Buyer shall notify Seller with (5) days of the discovery of such failure, and shall permit a representative of the Seller a reasonable opportunity to inspect the Goods. If it is mutually determined by Seller and Buyer that the failure is the result of defective material of workmanship, Seller's sole responsibility under this Warranty shall be, at Seller's sole discretion, to either repair or replace the defective Goods. If Seller chooses to replace the defective Goods, the new Goods will be delivered free of charge to the delivery point listed in the original purchase order.					
PRODUCT LINE / Warranty					
HENDRIX AERIAL COMPLETE SYSTEMS: Warranted to be free from defects in material and workmanship for a period of five (5) years after shipment, provided that: i. All system components are Hendrix-provided materials; ii. Seller provided a design or Seller approved a design provided by Buyer or third party; and iii. Seller has field inspected the installed system design and has confirmed that it meets Seller's standards.					
HENDRIX MOLDED PRODUCTS: Warranted for the life of the installation.					
KERITE POWER CABLE (MEDIUM AND HIGH VOLTAGE): Warranted for the life of the installation.					
13. LIMITATION OF LIABILITY. SELLER SHALL NOT BE LIABLE TO BUYER OR ANY OTHER PERSON OR ENTITY FOR ANY INCIDENTAL, CONSEQUENTIAL, EXEMPLARY,					

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Escalation/De-Escalation	FOB Factory	Prepaid & Allowed	**TBD**	
CUSTOMER (000704-000)		SHIP TO (000704-000)		
Burns & McDonnell		Burns & McDonnell		
*		*		
Jacksonville, FL 32221		Jacksonville, FL 32221		
ITEM	QUANTITY	PRODUCT NUMBER / DESCRIPTION	UNIT PRICE	EXTENSION (\$)
PUNITIVE OR SPECIAL DAMAGES OR ANY OTHER LOSSES, DAMAGES OR EXPENSES WHETHER ARISING OUT OF BREACH OF CONTRACT, TORT (INCLUDING NEGLIGENCE) OR OTHERWISE, REGARDLESS OF WHETHER SUCH DAMAGES WERE FORESEEABLE AND WHETHER OR NOT SELLER HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, AND NOTWITHSTANDING THE FAILURE OF ANY AGREED OR OTHER REMEDY OF ITS ESSENTIAL PURPOSE. IN NO EVENT SHALL SELLER BE LIABLE FOR ANY AMOUNT IN EXCESS OF THE PRICE RECEIVED BY SELLER FOR THE DELIVERABLES WITH RESPECT TO WHICH SUCH LIABILITY IS CLAIMED				
14. INDEMNIFICATION. Buyer shall defend, indemnify and hold Seller, its affiliates and their respective officers, directors, members, managers, representatives, agents and employees harmless from and against all claims, suits, demands, losses, liabilities, damages (including injury and death) and expenses (including reasonable attorneys' fees) (collectively, "Losses"), arising out of or relating to: (a) Buyer's or its agents provided specifications, design, structure, operation, material or method of making Deliverables ("Buyer's Specifications"), including without limitation, any resulting violation of intellectual property or proprietary rights; (b) Buyer's use, misuse or disposal of Deliverables or materials; (c) Buyer's non-compliance with any Law; (d) breach of these Terms by Buyer; and (e) Deliverables subjected to: (i) improper installation or storage; (ii) accident, damage, abuse or misuse; (iii) abnormal operating conditions or applications; (iv) operating conditions or applications above the rated capacity of the Deliverables; (v) repairs or modifications made to all or part of the Deliverables without the prior written consent of Seller; or (vi) a use or application other than or varying in any degree from the specifications and Seller's instructions.				
15. PATENTS. Provided Buyer has made all payments due Seller, Seller shall defend any suit brought against Buyer based upon a claim that the Deliverables infringe any United States patent issued as of the date of Seller's quotation and shall pay any damages and costs finally awarded therein against Buyer, provided that Seller is notified promptly in writing of such suit and is given full authority, information and assistance by Buyer to defend or settle the suit. Notwithstanding anything to the contrary, Seller will have no liability to the extent that the suit is based upon: (i) modifications to any item made by or on behalf of the Buyer in a manner that causes the infringement; (ii) use of any item in combination with the Deliverables that causes the infringement; (iii) the failure of the Buyer to use corrections or enhancements to the Deliverables that are made available by Seller; (iv) Buyer's Specifications; (v) Buyer's distribution, marketing or use for the benefit of third parties of the Deliverables; or (vi) use not authorized under these Terms. If the Deliverables or any part thereof are deemed to infringe any such patent, Seller shall, at its expense and sole option either: (a) procure for Buyer the right to continue using said Deliverables or part; (b) replace them with non-infringing Deliverables or parts; (c) modify them so they become non-infringing; or (d) remove them and refund the purchase price for them depreciated over no more than 3 years.				
16. TOOLING. In no event shall Buyer have any interest in any tools, jigs, dies, patterns, etc. (collectively, "Tooling") which is made or obtained for the production of the Deliverables. Such Tooling shall remain the property of Seller.				
17. CONFIDENTIALITY. All non-public or proprietary information of Seller, including all IP, quotations and pricing information, is confidential, solely for the use in performing hereunder and may not be disclosed, used or copied unless authorized by Seller in writing.				
18. INTELLECTUAL PROPERTY. All drawings, know-how, designs, specifications, inventions, devices, developments, processes, copyrights, trademarks, patents and applications therefor, and other information or intellectual property disclosed or otherwise provided to Buyer by Seller and all rights therein (collectively, "IP") are and will remain the property of Seller. Buyer shall have no claim to, nor ownership interest in, any IP and such information, in whatever form and any copies thereof, shall be promptly returned to Seller upon written request from Seller. Buyer acknowledges that no license or rights of any sort are granted to Buyer hereunder in respect of any IP, other than the limited right to use the Deliverables purchased from Seller.				
19. EXPORT COMPLIANCE. Any items provided by Seller are controlled by the United States Government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of, to any other country or to any person other than the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated into other items, without first obtaining approval from the United States Government or as otherwise authorized by U.S. Law and regulation.				
20. TARIFFS. The stated price is inclusive of any tariffs, duties, taxes, and fees imposed on imported merchandise that are or were in effect as of the date that the quote was issued. Seller may, in its sole discretion, increase the price to Buyer of the Goods by the amount of any increase in the tariffs, duties, taxes, or fees increased on the Goods. Seller shall endeavor to provide Buyer with 30 days' advanced written notice prior to implementing any tariff-related price increase, to the degree that there is at least 30 days between the implementation of the increase in tariffs, duties, taxes, or fees and the assessment of such increased tariffs, duties, taxes, or fees.				
21. DEFORMULATION. Buyer agrees that it shall not engage in or be a party to, or assist other persons in any form of deformulation, reverse engineering or component breakdown for the purpose of determining or evaluating confidential information.				
22. FORCE MAJEURE. Seller shall not be liable for any delay in or failure to perform due to any event or contingency beyond its reasonable control (an event of "Force Majeure"), including acts of God, epidemics, pandemics, governmental orders or work stoppages, acts of war whether declared or undeclared, blockades, labor disputes (whether of Seller's employees or the employees of others), raw material shortages and material increases in costs of raw materials, including those material increases in costs resulting from the imposition of tariffs. In the event of Force Majeure, the time for performance will extend for such time as reasonably				

SALES REPRESENTATIVE		CUSTOMER REQUEST NO.	REQUEST DATE	EXPIRATION DATE
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Escalation/De-Escalation	FOB Factory	Prepaid & Allowed	**TBD**	
CUSTOMER (000704-000)		SHIP TO (000704-000)		
Burns & McDonnell		Burns & McDonnell		
*		*		
Jacksonville, FL 32221		Jacksonville, FL 32221		
ITEM	QUANTITY	PRODUCT NUMBER / DESCRIPTION	UNIT PRICE	EXTENSION (\$)
necessary to enable Seller to perform. Seller may, during any period of shortage due to any of the above circumstances, allocate its available supply of Deliverables among itself and its purchasers in such manner as Seller, in its sole judgement, deems fair and equitable. Furthermore, to the extent that any Force Majeure event is then existing at the time the purchase order is accepted, including, without limitation, COVID-19, port congestion, and/or supply-chain disruption, such acceptance of a purchase order shall not constitute a waiver of Seller's right to assert such Force Majeure event as grounds to trigger this provision.				
23. TERMINATION. Seller shall have the right to cease work or terminate these Terms or any purchase order, in whole or in part, at any time, without liability, if: (i) Buyer breaches or defaults under these Terms or any other agreement it has with Seller; (ii) a petition under any applicable law relating to bankruptcy, insolvency, or reorganization is filed by or against Buyer; (iii) Buyer executes an assignment for benefit or creditors; (iv) a receiver is appointed for Buyer or any substantial part of its assets; or (v) Seller shall have any reasonable ground for insecurity with respect to Buyer's ability to perform and Buyer is unable to provide Seller with adequate assurance within 10 days after written request therefor by Seller. In all cases, Seller's rights are cumulative, are not exclusive and in addition to all other rights and remedies it may have at law or in equity. No termination shall affect any accrued rights or obligations of either party as of the effective date of such termination.				
24. WAIVER. All waivers by Seller shall be in writing. Failure of Seller at any time to require Buyer's performance of any obligation hereunder shall not affect Seller's right to require performance of that obligation. No delay or omission in the exercise of any right, power, or remedy hereunder shall impair such right, power, or remedy or be considered to be a waiver of any default or acquiescence therein.				
25. GOVERNING LAW. Any dispute arising out of or related to these Terms will be governed by and construed in accordance with the laws of the State of Illinois without regard to any rules on conflicts of laws and exclusively litigated in either (i) a state or federal court located in Cook County, Illinois, or (ii) a state or federal court located in the state of Seller's principal place of business, at Seller's sole discretion.				
26. SEVERABILITY. The unenforceability or invalidity of any clause in these Terms shall not have an impact on the enforceability or validity any other clause in these Terms. Any unenforceable or invalid clause shall be regarded as removed from these Terms to the extent of its unenforceability and invalidity.				
27. MISCELLANEOUS. Buyer shall not assign any of its rights or obligations under these Terms or any purchase order without Seller's prior written consent. Buyer shall comply with all applicable laws. There are no third-party beneficiaries. Provisions which by their nature should survive will remain in force after any termination or expiration of any sale of Deliverables. The section headings are included solely for the convenience of the parties.				

Behr, Jason

From: Koncelik, Randolph (Randy)
Sent: Thursday, November 6, 2025 3:13 PM
To: Crow, Joshua
Cc: Hamilton, Darrell D; Lockhart, Chase
Subject: Steelbald Reactor Study update

Joshua,

As discussed in our biweekly meeting yesterday, there is a need to release additional funding for the Steelbald Reactor project. When the project was proposed, the total expected amount was \$170,000. Of that only \$70k was partially funded. The breakdown of the \$170k is as follows:

Based on these rates, the expected cost of each task is as follows:

Task Description	Duration
Initial Investigation	\$32,000
PSCAD Model Development	\$55,000
Flicker/RVC Studies	\$20,000
Inrush/Outrush Studies	\$35,000
Harmonics Analysis	\$28,000
Total	\$170,000

We have since ruled out the need for the Inrush/Outush Study (\$35k), so in order to complete the PSCAD Model development and perform the remaining 2 studies, we would need an additional \$65k authorized , brining the total PO amount to \$135k.

Please let m know if you need anything further to proceed. Thanks!

Randy Koncelik, PMP \ Burns & McDonnell

Project Manager \ Transmission

o 321-249-6472 \ m 551-404-8393

rjkoncelik@burnsmcd.com \ burnsmcd.com

495 N Keller Rd, Suite 300 \ Maitland, FL 32751



Award #6 Supporting Documents 01/29/2026

1412071246 RFP Truck 5 Ton Jet Vacuum Loaders 16 CU YD - Response Workbook					Proposed Price \$2,488,660.00		
Supplier Name:							
Instructions: Provide price per vehicles with specifications listed in Appendix A.The lead-time listed in Column H must be the number of calendar days after receipt of order that JEA will receive the vehicle, not the number of days to ship. This should be as number of days, do not quote a range. Quote the following vehicles F.O.B. Destination: JEA Fleet Facility (5717 New Kings Road Jacksonville, Florida 32209). Your quoted unit price must be listed in Column F. You must be capable of providing all 4 vehicles requested. Take the final amount located in cell G2 and transfer that total to Appendix B - Response Form.							
JEA Item ID	Item Description	Mfg. Name & Mfg. Part Number	UOM	Number of Vehicles	Quoted Unit Price	Total Price	Lead Time: In Calendar Days After Receipt of Order
JEA CLASS 143: Truck 5 Ton Jet Vacuum Loaders 16 CU YD	Truck 5 Ton 4X6 Jet Vacuum Loaders 16 CU YD	Freightliner M2-114, International HX620, Kenworth T880, MACK Granite or Equivalent	Each	4	\$ 622,165.00	\$2,488,660.00	Delivery on 10/1/2026

**1412071246 APPENDIX B – RESPONSE FORM
RFP TRUCK 5 TON JET VACUUM LOADERS 16 CU YD**

Submit the Response electronically as described in sections 1.4 and 1.5 of the Solicitation.

Company Name: Environmental Products Group, Inc.

Company's Address: 700 Hermit Smith Rd., Apopka FL 32703

License Number: VI/1005350/1

Phone Number: 904-537-8799

Email Address: ncausey@myepg.com

BID SECURITY REQUIREMENTS

- ☒ **None required**
☐ Certified Check or Bond (Five Percent (5%))

TERM OF CONTRACT

- ☒ **One Time Purchase**
☐ Annual Requirements: 3 years with two 1-year renewals
☐ Other, Specify - Project Completion

SAMPLE REQUIREMENTS

- ☒ **None required**
☐ Samples required prior to Bid Opening
☐ Samples may be required subsequent to Bid Opening

SECTION 255.05, FLORIDA STATUTES CONTRACT BOND

- ☒ **None required**
☐ Bond required 100% of Bid Award

QUANTITIES

- ☒ **Quantities indicated are exacting**
☐ Quantities indicated reflect the approximate quantities to be purchased Throughout the Contract period and are subject to fluctuation in accordance with actual requirements.

INSURANCE REQUIREMENTS

Insurance required

PAYMENT DISCOUNTS

- ☐ 1% 20, net 30
☐ 2% 10, net 30
☐ Other _____
☒ **None Offered**

ENTER YOUR RESPONSE FOR SOLICITATION xxx

TOTAL RESPONSE PRICE

Total Response Price (transfer total from Response Workbook)

\$ \$2,488,660.00

☒ **I have read and understood the Sunshine Law/Public Records clauses contained within this solicitation. I understand that in the absence of a redacted copy my proposal will be disclosed to the public "as-is".**

RESPONDENT CERTIFICATION

By submitting this Response, the Respondent certifies that it has read and reviewed all of the documents pertaining to this Solicitation, that the person signing below is an authorized representative of the Responding Company, that the Company is legally authorized to do business in the State of Florida, and that the Company maintains in active status an appropriate contractor's license for the work (if applicable). The Respondent also certifies that it complies with all sections (including but not limited to Conflict of Interest and Ethics) of this Solicitation.

We have received addenda

1 through 2

Handwritten Signature of Authorized Officer of Company or Agent

Date

Nick Causey

Sales Manager

Printed Name and Title

1412066050

APPENDIX B – RESPONSE FORM

1412022250 (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and Ammonia Sampling Grid

Submit the Response electronically as described in sections 1.4 and 1.5 of the Solicitation.

Company Name: Groome Industrial Service Group LLCCompany's Address: 305 Palmer Rd, Denville, NJ 07834Phone Number: 201-445-6100 Email Address: shoughton@groomeindustrial.com**BID SECURITY REQUIREMENTS**

- ☐ None required
☒ Certified Check or Bond (Five Percent (5%))

TERM OF CONTRACT

- ☐ One Time Purchase
☐ Annual Requirements
☒ Other, Specify - Project Completion

SAMPLE REQUIREMENTS

- ☒ None required
☐ Samples required prior to Bid Opening
☐ Samples may be required subsequent to Bid Opening

SECTION 255.05, FLORIDA STATUTES CONTRACT BOND

- ☐ None required
☒ Bond required 100% of Bid Award

QUANTITIES

- ☒ Quantities indicated are exacting
☐ Quantities indicated reflect the approximate quantities to be purchased Throughout the Contract period and are subject to fluctuation in accordance with actual requirements.

INSURANCE REQUIREMENTS

Insurance required

PAYMENT DISCOUNTS

- ☐ 1% 20, net 30
☐ 2% 10, net 30
☐ Other _____
☒ None Offered

Proposal Description	AMMONIA INJECTION GRID	Lance Upgrade ¹ (Optional)	Sampling Grid	AIG tuning and performance testing
Scope Description	Section Ala – Alg	Section AlgH	Section B	Section C
Cost \$	\$ 1,057,678.42	\$ Included in left	\$ 243,595.00	\$ 143,942.50
Total Bid Price	\$ 1,445,215.92 (taxes included)			

Note 1: For Bids with Lance Replacements bidders are requested to provide a description and/or technical reports demonstrating the effectiveness of the improvement.

☒ I have read and understood the Sunshine Law/Public Records clauses contained within this solicitation. I understand that in the absence of a redacted copy my proposal will be disclosed to the public "as-is".

RESPONDENT CERTIFICATION

By submitting this Response, the Respondent certifies that it has read and reviewed all of the documents pertaining to this Solicitation, that the person signing below is an authorized representative of the Responding Company, that the Company is legally authorized to do business in the State of Florida, and that the Company maintains in active status an appropriate contractor's license for the work (if applicable). The Respondent also certifies that it complies with all sections (including but not limited to Conflict of Interest and Ethics) of the Solicitation.

We have received addenda

1 through 1

Handwritten Signature of Authorized Officer of Company or Agent

Date

Steve Houghton - Chief Revenue Officer
 Printed Name and Title

1412066050

1412022250 APPENDIX B – RESPONSE FORM

1412066050

APPENDIX B – RESPONSE FORM

~~1412022250~~ (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and Ammonia Sampling Grid

THE MINIMUM QUALIFICATIONS SHALL BE SUBMITTED ON THIS FORM. IN ORDER TO BE CONSIDERED A QUALIFIED BIDDER BY JEA YOU MUST MEET THE MINIMUM QUALIFICATIONS LISTED BELOW, AND BE ABLE TO PROVIDE ALL THE SERVICES LISTED IN THIS SOLICITATION.

THE BIDDER MUST COMPLETE THE BIDDER INFORMATION SECTION BELOW AND PROVIDE ANY OTHER INFORMATION OR REFERENCE REQUESTED. THE BIDDER MUST ALSO PROVIDE ANY ATTACHMENTS REQUESTED WITH THIS MINIMUM QUALIFICATIONS FORM.

BIDDER INFORMATION

COMPANY NAME: Groome Industrial Service Group LLC

BUSINESS ADDRESS: 305 Palmer Rd

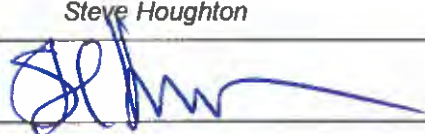
CITY, STATE, ZIP CODE: Denville, NJ 07834

TELEPHONE: 800-505-6100

FAX: _____

E-MAIL: shoughton@groomeindustrial.com

PRINT NAME OF AUTHORIZED REPRESENTATIVE: Steve Houghton

SIGNATURE OF AUTHORIZED REPRESENTATIVE: 

NAME AND TITLE OF AUTHORIZED REPRESENTATIVE: Steve Houghton - Chief Revenue Officer

MINIMUM QUALIFICATIONS:

Respondent must meet the following Minimum Qualifications to be considered eligible to have its Response evaluated by JEA. Respondent must complete and submit the Minimum Qualification Form provided in this Solicitation. Respondents that are working or have worked for JEA in the past 2 years involving similar work must submit JEA as a reference. JEA reserves the right to ask for additional back up documentation or additional reference projects to confirm the Respondent meets the requirements stated above.

JEA in its sole discretion may reject Responses from Respondents not meeting all of the following Minimum Qualifications:

1. The Respondent is not on the State of Florida Convicted Vendor List, State of Florida's Suspended Vendor List, The City of Jacksonville's Disqualified Vendor List, have not had their bidding privileges actively suspended by JEA, been debarred by JEA, or have had a contract with JEA terminated for default within the last two (2) years.

1412066050

1412066050

APPENDIX B – RESPONSE FORM

~~1412022250~~ (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and Ammonia Sampling Grid

2. The respondent must have a minimum of three (3) years of relevant experience in the design and installation of ammonia sampling grids and/or ammonia injection systems. The company must have completed similar work within the past five (5) years. "Similar work" is defined as ammonia injection or sampling grid installations valued at \$500,000 or more within a 125 MW or larger combined cycle SCR catalyst system. To demonstrate this experience, the respondent shall submit up to three (3) verifiable reference projects.
3. The Respondent shall comply with the technical and commercial specifications for this solicitation.

1. REFERENCE

Reference Name: Al VanHart

Reference Phone Number: 610-220-5491

Reference Company Name: Kearny Generating Station

Address of Work: 118 Hackensack Avenue

Reference E-Mail Address: avanhart@camsops.com

Dates of Work/Number of Sites: CO Catalyst Retrofit on Multiple Units, last one in spring of 2025

Description of Work including contract value: Proprietary

2. REFERENCE

Reference Name: Lawrence Cline

Reference Phone Number: 330-368-8544

Reference Company Name: Shell Monaca

Address of Work: 300 Frankfort Rd, Monaca, PA 15061

Reference E-Mail Address: Lawrence.Cline@shell.com

Dates of Work/Number of Sites: SCR Retrofit and Economizer Tube Replacements in Spring of 2025, more retrofits scheduled for Fall 25 and Spring 26

Description of Work including contract value: Proprietary

1412066050

1412066050
~~1412022250~~ (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and
Ammonia Sampling Grid

3. REFERENCE

Reference Name: Lee Guidry
Reference Phone Number: 281-723-7470
Reference Company Name: Cedar Bayou Power Station
Address of Work: 7705 W Bay Road, Baytown TX, 77523
Reference E-Mail Address: lee.guidry@nrg.com
Dates of Work/Number of Sites: Vector Systems designed a Catalyst frame and APCU for Cedar Bayou in 2024
Description of Work including contract value: Proprietary

1412066050

APPENDIX B – RESPONSE FORM

~~1412022250~~ (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and Ammonia Sampling Grid

1412066050

LIST OF SUBCONTRACTORS

JEA Solicitation Number _____ requires certain major Subcontractors be listed on this form, unless the work will be self- performed by the Company.

The undersigned understands that failure to submit the required Subcontractor information on this form will result in bid rejection, and the Company agrees to employ the Subcontractors specified below: (Use additional sheets as necessary)

Note: This list of Subcontractors shall not be modified subsequent to bid opening, without a showing of good cause and the written consent of JEA.

Type of Work	Corporate Name of Subcontractor	Subcontractor Primary Contact Person & Telephone Number	Subcontractor's License Number (if applicable)	Percentage of Work or Dollar Amount
AIG Lance Supply	Vector	Michael Frazee 936-537-4794		39%
AIG Tuning	Environex	Andrew Toback 610-209-6136		10%

Signed: _____

Company: Groome Industrial Service Group LLC

Address: 305 Palmer Rd, Denville, NJ 07834

Date: 12/16/2025

1412066050

1412066050

APPENDIX B – RESPONSE FORM

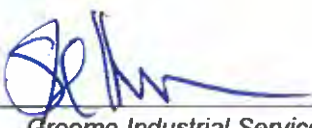
~~1412022250~~ (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and Ammonia Sampling Grid

LIST OF JSEB SUBCONTRACTORS

The following JSEB Subcontractors will be utilized in fulfilling the terms and conditions of a Project Authorization arising from award of JEA ¹⁴¹²⁰⁶⁶⁰⁵⁰~~1412022250~~. I (We) the undersigned understand that failure to submit said information will result in bid rejection. I (We) will employ the JSEB Subcontractors specified below: (Use additional sheets as necessary)

Class of Work (Category) Dollar Amount	Name of JSEB Contractor (Indicate below)	Percentage of Total Job or

None

Signed: 
Company: Groome Industrial Service Group LLC
Address: 305 Palmer Rd, Denville, NJ 07834
Date: 12/16/2025

1412066050

1412066050

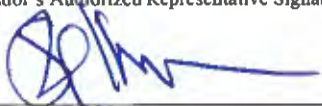
APPENDIX B – RESPONSE FORM

~~1412022250~~ (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and Ammonia Sampling Grid

Note: This list shall not be modified subsequent to bid opening without a showing of good cause and the written consent of the JEA.

**CONFLICT OF INTEREST DISCLOSURE FORM**

*Disclosing a potential conflict of interest does not disqualify vendors. In the event vendors do not disclose potential conflicts of interest, and they are detected by JEA, vendor may be **disqualified** from doing business with JEA.*
Questions about this form? Contact (JEA, Buyer)

JEA Bid/Solicitation/Contract Number: 1412066050	Name of JEA Employee(s) Working on Vendor's Current Contract(s) with JEA: Tom Cook
Vendor Name: Groome Industrial Service Group LLC	Vendor Phone: 800-505-6100
Vendor's Authorized Representative Name and Title: Steve Houghton - Chief Revenue Officer	Authorized Representative's Phone: 201-445-6100 x132
NAME(S) OF JEA EMPLOYEE(S) / PUBLIC OFFICER(S) WITH POTENTIAL CONFLICT OF INTEREST	
Name of JEA public officer(s), employee(s), or relatives with whom there may be a potential conflict of interest. If more than five, attach a second form.	Relationship of JEA public officer(s)/employee(s) and/or relative(s) to vendor's company from list above (e.g. 1(a), 2, etc.). Please list all that apply:
1.	
2.	
3.	
4.	
5.	
☒ Vendor has no conflict of interest to report. ☒ Vendor hereby declares it has not and will not provide gifts or hospitality of any dollar value or any other gratuities to any JEA officer or employee to obtain or maintain a contract. ☒ I certify that this Conflict-of-Interest Disclosure has been examined by me and that its contents are true and correct to my knowledge and belief and I have the authority to so certify on behalf of the Vendor.	
Vendor's Authorized Representative Signature: 	Date: 12/16/2025

1412066050

~~1412022250~~ APPENDIX B – RESPONSE FORM

1412066050

APPENDIX B – RESPONSE FORM

**1412022250 (RFP) Brandy Branch Generating Station Ammonia Injection Lance Upgrade and
Ammonia Sampling Grid**

FOR JEA USE ONLY IF CONFLICT NOTED

This form has been reviewed by:

Name of JEA Ethics Officer:	Signature:	Date:
Note:		

1412066050

GIS - 0903

BID BOND

STATE OF FLORIDA

COUNTY OF: Duval

KNOW ALL PERSONS BY THESE PRESENTS, That we, Groome Industrial Service Group, LLC (hereinafter called "Principal"), and United States Fire Insurance Company as Surety (hereinafter called "Surety"), are held and firmly bound unto the JEA of the City of Jacksonville, Florida (hereinafter called the "JEA"), in the sum of \$ 5% of amount bid lawful money of the United States of America, for the payment which sum well and truly to be made, we bind ourselves, our heirs, executors, administrators, and successors, jointly and severally, firmly by these presents:

WHEREAS, the Principal contemplates submitting or has submitted a Bid to the JEA for:

Brandy Branch Generating Station Ammonia Injection Lance Upgrade and Ammonia Sampling Grid

for JEA Jacksonville, FL

Solicitation Number 1412022250

Bid Date 9/3/2025

WHEREAS, it was a condition precedent to the submission of said Bid that a certified check or Bid Bond in the amount of 5% of amount bid be submitted with said Bid as a guaranty that the Principal would, if awarded the contract, enter into a written contract with the JEA and furnish a Section 255.05 Florida Statutes Contract Bond in an amount equal to Contract Amount for the performance of said contract, within ten consecutive calendar days after written notice being given of acceptance by the JEA.

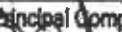
NOW, THEREFORE, THE CONDITIONS OF THIS OBLIGATION ARE SUCH, that if the Bid of the Principal herein be accepted and said Principal, within ten consecutive calendar days after written notice being given of such acceptance, enters into a written contract with the JEA, and furnishes a Section 255.05, Florida Statutes Contract Bond in an amount equal to Contract Amount satisfactory to the JEA, then this obligation shall be void; otherwise, the sum herein stated shall be due and payable to the JEA, and the Surety herein agrees to pay said sum immediately upon demand of said JEA, in good and lawful money of the United States of America; as liquidated damages for failure thereof of said Principal.

Signature
Terry Ziegner
Type/Print Name

Signature
Terry Ziegner
Type/Print Name

Signature _____
Monika Jastrzebski account executive-bonds
Type/Print Name _____

Signature _____
Anna Brauntsch - account manager
Type/Print Name _____

Groome Industrial Service Group, LLC
(Principal Company Name)

Signature
Steve Houghton
Type/Print Name
Chief Revenue Officer
Title
AS PRINCIPAL

United States Fire Insurance Company

(Surety Company Name)

Aaron V. Nowland

Signature

Aaron V. Nowland

Type/Print Name

Attorney In Fact

Title

AS SURETY

Name of Agent: Atlantic Coast Surety, LLC

Address: 300 Tice Blvd, Suite 300
Woodcliff Lake, NJ 07677

By _____
Resident Agent
State of Florida

Address: _____

Assistant General Counsel

**POWER OF ATTORNEY
UNITED STATES FIRE INSURANCE COMPANY
PRINCIPAL OFFICE - MORRISTOWN, NEW JERSEY**

06385

KNOW ALL MEN BY THESE PRESENTS: That United States Fire Insurance Company, a corporation duly organized and existing under the laws of the state of Delaware, has made, constituted and appointed, and does hereby make, constitute and appoint:

Robert G. Lull, Aaron V. Nowland, Arpi Mekhjian

each, its true and lawful Attorney(s)-In-Fact, with full power and authority hereby conferred in its name, place and stead, to execute, acknowledge and deliver: Any and all bonds and undertakings of surety and other documents that the ordinary course of surety business may require, and to bind United States Fire Insurance Company thereby as fully and to the same extent as if such bonds or undertakings had been duly executed and acknowledged by the regularly elected officers of United States Fire Insurance Company at its principal office, in amounts or penalties: **Unlimited**

This Power of Attorney limits the act of those named therein to the bonds and undertakings specifically named therein, and they have no authority to bind United States Fire Insurance Company except in the manner and to the extent therein stated.

This Power of Attorney is granted pursuant to Article IV of the By-Laws of United States Fire Insurance Company as now in full force and effect, and consistent with Article III thereof, which Articles provide, in pertinent part:

Article IV, Execution of Instruments - Except as the Board of Directors may authorize by resolution, the Chairman of the Board, President, any Vice-President, any Assistant Vice President, the Secretary, or any Assistant Secretary shall have power on behalf of the Corporation:

(a) to execute, affix the corporate seal manually or by facsimile to, acknowledge, verify and deliver any contracts, obligations, instruments and documents whatsoever in connection with its business including, without limiting the foregoing, any bonds, guarantees, undertakings, recognizances, powers of attorney or revocations of any powers of attorney, stipulations, policies of insurance, deeds, leases, mortgages, releases, satisfactions and agency agreements;

(b) to appoint, in writing, one or more persons for any or all of the purposes mentioned in the preceding paragraph (a), including affixing the seal of the Corporation.

Article III, Officers, Section 3.11, Facsimile Signatures. The signature of any officer authorized by the Corporation to sign any bonds, guarantees, undertakings, recognizances, stipulations, powers of attorney or revocations of any powers of attorney and policies of insurance issued by the Corporation may be printed, facsimile, lithographed or otherwise produced. In addition, if and as authorized by the Board of Directors, dividend warrants or checks, or other numerous instruments similar to one another in form, may be signed by the facsimile signature or signatures, lithographed or otherwise produced, of such officer or officers of the Corporation as from time to time may be authorized to sign such instruments on behalf of the Corporation. The Corporation may continue to use for the purposes herein stated the facsimile signature of any person or persons who shall have been such officer or officers of the Corporation, notwithstanding the fact that he may have ceased to be such at the time when such instruments shall be issued

IN WITNESS WHEREOF, United States Fire Insurance Company has caused these presents to be signed and attested by its appropriate officer and its corporate seal hereunto affixed this 5th day of May, 2025.

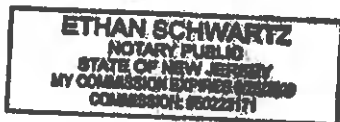
UNITED STATES FIRE INSURANCE COMPANY



Matthew E. Rubin
Matthew E. Rubin, President

State of New Jersey)
County of Morris)

On this 5th day of May, 2025, before me, a Notary public of the State of New Jersey, came the above named officer of United States Fire Insurance Company, to me personally known to be the individual and officer described herein, and acknowledged that he executed the foregoing instrument and affixed the seal of United States Fire Insurance Company thereto by the authority of his office.



Ethan Schwartz
Ethan Schwartz (Notary Public)

I, the undersigned officer of United States Fire Insurance Company, a Delaware corporation, do hereby certify that the original Power of Attorney of which the foregoing is a full, true and correct copy is still in force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the corporate seal of United States Fire Insurance Company on the 2nd day of September 2025

UNITED STATES FIRE INSURANCE COMPANY

Michael C. Fay
Michael C. Fay, Senior Vice President



UNITED STATES FIRE INSURANCE COMPANY
1209 ORANGE STREET, WILMINGTON, DELAWARE 19801

STATEMENT OF ASSETS, LIABILITIES, SURPLUS AND OTHER FUNDS

AT DECEMBER 31, 2024

ASSETS	
Bonds (Amortized Value).....	1,483,775,036
Preferred Stocks (Market Value).....	157,980,976
Common Stocks (Market Value).....	2,852,736,803
Mortgage Loans (Market Value).....	1,174,287,654
Real Estate.....	95,552,039
Cash, Cash Equivalents, and Short Term Investments.....	536,934,786
Derivatives.....	48,305,898
Other Invested Assets.....	603,007,875
Investment Income Due and Accrued.....	30,714,918
Premiums and Considerations.....	591,050,781
Amounts Recoverable from Reinsurers.....	106,413,303
Funds Held by or Deposited with Reinsured Companies.....	230,146,645
Net Deferred Tax Asset.....	196,111,925
Electronic Data Processing Equipment.....	608,866
Receivables from Parent, Subsidiaries and Affiliates.....	36,228,378
Other Assets.....	132,241,510
TOTAL ASSETS.....	\$ 8,276,097,393

LIABILITIES, SURPLUS & OTHER FUNDS

Losses (Reported Losses Net of Reinsurance Ceded and Incurred But Not Reported Losses).....	3,105,311,065
Reinsurance Payable on Paid Losses and Loss Adjustment Expenses.....	119,842,499
Loss Adjustment Expenses.....	516,006,642
Commissions Payable, Contingent Commissions and Other Similar Charges.....	28,497,890
Other Expenses (Excluding Taxes, Licenses and Fees).....	106,484,629
Taxes, Licenses and Fees (Excluding Federal Income Taxes).....	30,351,557
Current Federal and Foreign Income Taxes.....	13,076,127
Unearned Premiums.....	1,159,871,296
Advance Premium.....	12,532,810
Ceded Reinsurance Premiums Payable.....	168,127,598
Funds Held by Company under Reinsurance Treaties.....	83,209,337
Amounts Withheld by Company for Account of Others.....	130,755,663
Provision for Reinsurance.....	1,356,147
Payable to Parent, Subsidiaries and Affiliates.....	55,190,326
Other Liabilities.....	48,837,986
TOTAL LIABILITIES.....	\$ 5,579,451,574
Common Capital Stock.....	18,780,000
Gross Paid In and Contributed Surplus.....	1,502,074,940
Unassigned Funds (Surplus).....	1,175,790,879
Surplus as Regards Policyholders.....	2,696,645,819
TOTAL LIABILITIES, SURPLUS & OTHER FUNDS.....	\$ 8,276,097,393

I, Carmine Scaglione, Senior Vice President and Controller of UNITED STATES FIRE INSURANCE COMPANY, certify that the foregoing is a fair statement of Assets, Liabilities, Surplus and Other Funds of this Company, at the close of business, December 31, 2024, as reflected by its books and records and as reported in its statement on file with the Insurance Department of the State of Delaware.



IN TESTIMONY WHEREOF, I have set my hand and affixed the seal of the Company, this 12th day of March, 2025.
UNITED STATES FIRE INSURANCE COMPANY



ACORD™

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

3/03/2025

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer any rights to the certificate holder in lieu of such endorsement(s).

PRODUCER USI Insurance Services LLC 1787 Sentry Pkwy W., Veva 16 Suite 300 Blue Bell, PA 19422		CONTACT NAME: Ruth Cocco PHONE (A/C, No, Ext): 484-754-1503 E-MAIL ADDRESS: ruth.cocco@usi.com FAX (A/C, No): 610-537-4974	
INSURED Groome Industrial Service Group, LLC 305 Palmer Road Denville, NJ 07834		INSURER(S) AFFORDING COVERAGE INSURER A: National Union Fire Ins Co of Pitts, PA INSURER B: AXIS Surplus Insurance Company INSURER C: SiriusPoint Specialty Insurance Corp INSURER D: Arch Specialty Insurance Company INSURER E: AIU Insurance Company INSURER F:	
		NAIC #	
		19445	
		26620	
		16820	
		21199	
		19399	

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	☒ COMMERCIAL GENERAL LIABILITY ☐ CLAIMS-MADE ☒ OCCUR ☒ Blkt. Contractual ☒ XCU Included GEN'L AGGREGATE LIMIT APPLIES PER: ☐ POLICY ☐ PRO-JECT ☐ LOC OTHER:	X	X	5180195	03/01/2025	03/01/2026	EACH OCCURRENCE \$2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$300,000 MED EXP (Any one person) \$25,000 PERSONAL & ADV INJURY \$2,000,000 GENERAL AGGREGATE \$4,000,000 PRODUCTS - COMP/OP AGG \$4,000,000 \$
A	AUTOMOBILE LIABILITY ☒ ANY AUTO OWNED AUTOS ONLY ☒ HIRED AUTOS ONLY ☐ SCHEDULED AUTOS NON-OWNED AUTOS ONLY	X	X	2961621	03/01/2025	03/01/2026	COMBINED SINGLE LIMIT (Ea accident) \$2,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
B	UMBRELLA LIAB ☒ OCCUR EXCESS LIAB ☐ CLAIMS-MADE	X	X	See below Desc. of Ops for Limits Breakdown	03/01/2025	03/01/2026	EACH OCCURRENCE \$13,000,000
C					03/01/2025	03/01/2026	AGGREGATE \$13,000,000
D	DED ☒ RETENTION \$0				03/01/2025	03/01/2026	\$
E	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? ☒ Y/N (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below		X	11431378 (AOS) 31566223 (CA Only)	03/01/2025	03/01/2026	☒ PER STATUTE ☐ OTH-ER E.L. EACH ACCIDENT \$2,000,000 E.L. DISEASE - EA EMPLOYEE \$2,000,000 E.L. DISEASE - POLICY LIMIT \$2,000,000
C	Pollution Liab			CPPLS000165905	03/01/2025	03/01/2026	\$10,000,000 Ea Occ/Agg
\$							\$25,000 Retention
C	Professional Liab			CPPLS000165905	03/01/2025	03/01/2026	\$2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

- Groome Industrial Service Group, LLC
 - Groome Door & Mechanical Systems, LLC
 - Expro (DE), LLC(d/b/a Expro, LLC
 - Expro Specialized Services, LLC
 - Explosive Professionals, LLC
- (See Attached Descriptions)

CERTIFICATE HOLDER

CANCELLATION

JEA and Florida Power & Light
 Attn: JEA Procurement Services
 Customer Care Center 6th Floor
 21 West Church Street
 Jacksonville, FL 32202

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE



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DESCRIPTIONS (Continued from Page 1)

6. Explosive Professionals Midwest, LLC
7. Groome Industrial Holdings, LLC
8. GIH Blocker Corp.
9. Noxco, LLC
10. Dos Viejos Amigos, LLC
11. Blasting Solutions, Inc.
12. Blasting Solutions, LLC
13. Groome Real Estate, LLC
14. Groome Industrial Service Group, LLC dba Groome Paint Shop
15. Groome Industrial Service Group, LLC dba Groome Welding School
16. Groome Industrial Service Group, Inc.
17. Shawnee Industrial Corporation, Inc.
18. Groome Door & Mechanical Systems, Inc.
19. J.M. Groome Company
20. J.M. Groome Inc.
21. Groome Hangar Services Company
22. J.M. Groome Equipment, Inc.
23. Expro, Inc.
24. Allsouth Environmental Services, LLC
25. Ducks Paint Shop, LLC
26. Fort Smith Industrial Supply, LLC
27. H2O Underpressure LLC
28. Orange Industrial Services, LLC
29. W-S Industrial Services, Inc.
30. W-S Mechanical Group, LLC
31. W-S Mechanical Group dba Force Welding School
32. Groome Industrial Holdings, LLC
33. W-S Specialty Services, LLC
34. W-S Companies, LLC
35. W-S Industrial Services, LLC

Excess Liability Policy - 1st Layer:

Axis Surplus Insurance Company - Insurer Code: B

Policy #P00100152204201

Effective: 3/1/2025 - 3/1/2026

Limit: \$3,000,000 Ea. Occ./Aggregate

Excess Liability Policy - 2nd Layer:

SiriusPoint Specialty Insurance Group - Insurer Code: C

Policy #TSX00134025

Effective: 3/1/2025- 3/1/2025

Limit: \$5,000,000 Ea. Occ/Aggregate

Excess Liability Policy - 3rd Layer:

Arch Specialty Insurance - Company Insurer Code: D

Policy #UXP105806900

Effective: 3/1/2025- 3/1/2025

Limit: \$5,000,000 Ea. Occ/Aggregate

General Liability Policy Includes: Blanket Additional Insured; Primary & Non-Contributory and Waiver of Subrogation included where required by written contract and subject to the terms and conditions of the policy.

Automobile Policy Includes: Blanket Additional Insured; Primary as to Certain Additional Insureds and Waiver of Subrogation are included where required by written contract and subject to the terms and conditions of the policy. Comprehensive Ded: \$250. Collision Ded: \$250.

Workers Compensation Policy Includes: Blanket Waiver of Subrogation applies were required by written

DESCRIPTIONS (Continued from Page 1)

contract and subject to the terms and conditions of the policy and where permitted by law.

Umbrella Policy is Follow Form over the General Liability, Automobile Liability and Workers Compensation policies, but subject to its own terms and conditions.

Pollution Liability Includes: Blanket Additional Insured; Primary & Non-Contributory and Waiver of Subrogation included where required by written contract and subject to the terms and conditions of the policy

305 Palmer Road, Denville, NJ 07834 | P: 800-505-6100 | F: 201-652-6394 | www.groomeindustrial.com

December 15, 2025

Mr. Tom Cook
JEA Brandy Branch
15701 West Beaver Street
Baldwin, FL 32234

RE: AIG Lance Upgrades and Permanent Sampling Grid

Dear Mr. Cook:

We are pleased to provide you with the following proposal. We have worked diligently with equipment manufacturers, HRSG engineers and end users like yourself in the development of many proprietary methodologies to ensure that we are providing the best possible products and service for your specific needs – *the only turn-key service we know of that is so widely and extensively endorsed*. A list of references for similar work is available upon request.

You are being provided with a technical specification containing information that we have carefully developed and therefore consider proprietary and privileged. If you require a work scope that can be published for use in a competitive bid process, we will be happy to craft one for you based on your needs. Re-publishing any portion of the technical information contained herein is not acceptable.

We submit this proposal, subject to the enclosed terms and conditions, to furnish all requisite labor, supervision, material, equipment, workers' compensation, public liability and property damage insurance to perform the following work:

SPECIFICATIONS

Item #1: Katana - Ammonia Injection Grid Upgrade

Area: AIG Lances (2 units)

Scope of Work:

Groome will utilize Vector Systems to supply the upgrades AIG lances. This includes:

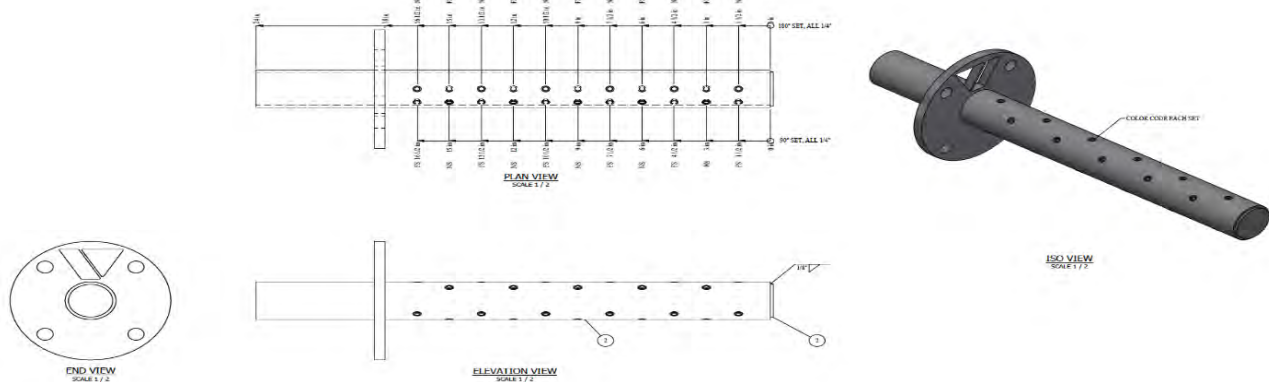
- Engineered to fit into current casing and improve Ammonia-Nox Distribution
- Twenty-two (22) AIG lance assemblies proposed. Eleven (11) assemblies per side of duct. Each assembly will consist of four (4) 2" OD 304SS sch 40 lances. A total of eighty-eight lances are proposed.
- The following items, for the manifold assemblies, will be shipped loose for field installation by others:
 - Two (2) pressure gauges; one per manifold inlet
 - Twenty-two (22) 304SS orifice plates
 - Forty-four (44) ½" NPT SS needle valves
 - Twenty-two (22) 2" SS isolation gate valves
 - Twenty-two (22) differential pressure indicators
 - Necessary gaskets, nuts, and studs

- F.O.B. Point of Manufacturer. McKinney, Texas. USA
- Delivery: 20 Weeks After Approval to Fabricate
- More information is attached at the bottom of this proposal.

The Vector Systems KATANA™ AIG

Using Vector systems patented design software we optimize lance orifice sizing, spacing, and layout to match site-specific duct conditions and gas flow patterns. This improves ammonia distribution, enhances NOx reduction, and reduces susceptibility to plugging—enabling:

- Maximized NOx reduction with minimal NH3 slip, helping to better maintain regulatory compliance
- Extends catalyst life by improving reagent mixing and distribution across entire area of catalyst
- Reduces downtime and maintenance time resulting from plugged AIG holes
- Achieves better NOx reduction performance within existing footprint



Item #2: Ammonia Injection Grid Replacement

Area: AIG Lances (2 units – 88 lances)

Scope of Work:

1. Demolition and removal and disposal of existing AIG.
2. Procure and turnkey-install the following:
 - a. Pressure gauge near manifold inlet
 - b. Orifice plate at each branch take-off
 - c. High-Performance stainless steel throttling valve at each branch take-off
 - d. Stainless steel isolation gate valve at each branch take-off
 - e. Differential pressure indicators at each branch take-off
 - f. Tubing and fittings for plumbing differential pressure indicators to orifice plates
 - g. Stainless Steel Ammonia Injection Grid (Katana by Vector Systems, comparable to EDGE by CECO - Peerless)

Item #3: Permanent sampling grid.

Area: Downstream of the SCR Catalyst (2 units – 22 points per unit).

*** PROPRIETARY OR PRIVILEGED INFORMATION ***

The information contained in this document, including technical data and pricing values, is the property of Groome Industrial Service Group, LLC. It is disclosed in confidence and may be subject to Attorney-Client privilege. This information is to be used only to secure services from Groome Industrial Service Group, LLC and any unauthorized use, distribution, disclosure, or review is prohibited.

Notes: Please note that Groome will be attaching the PSG to the existing SCR framework downstream of the catalyst. This needs to be installed here, before the NOx has a chance to over mix, rendering a sampling grid ineffective at identifying problem areas.

This proposal assumes the new SCR catalyst is a single layer design. If the design varies, the sampling grid could become obsolete or need modifications to make it effective. These changes are not included in this proposal.

Scope of Work:

1. Safety:

- 1.1. Groome will prepare and provide all permits, attendants, ventilation, air monitoring and PPE required for Confined Space Entry.
- 1.2. An emergency procedure will be written specifically for this project and will be attached to all permits.
- 1.3. All necessary equipment will be locked out / tagged out prior to work in those areas.
- 1.4. Some plant assistance will be required in identifying the best safe practices for work around this equipment.
- 1.5. SDS will be provided for all material prior to arrival on site.
- 1.6. A one-hour safety orientation has been included in this proposal.
- 1.7. Fire-rated clothing is not included in this proposal. If fire-rated clothing is required, it will be provided at an additional cost.

2. Scaffolding:

- 2.1. Groome will install all necessary scaffolding to reach the downstream side of the SCR.

3. Grid Design:

- 3.1. GISG has designed a 22-point sampling grid with an array of sampling points that correlate to tunable areas of the duct cross-section.
- 3.2. A map of the grid will be provided to correlate sample locations in the duct with tubing connections outside the duct.

4. Installation:

- 4.1. Groome will provide and install all hardware, including stainless steel tubing, tubing hangers, Swagelok fittings, new ports and bulkhead fittings, and sample line tags.
- 4.2. A map will be provided by Groome that correlates the tagging system to the originally supplied sample map.
- 4.3. All welding will be performed, as necessary.

5. Clean-up:

- 5.1. Upon completion the work area will be heavy duty vacuum cleaned to ensure removal of all residual debris.
- 5.2. All scaffolding will be removed.
- 5.3. All waste will be disposed of in containers supplied by the plant.

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Item #4: Ammonia Injection Grid Tuning

Area: Ammonia Injection Permanent Sampling Grid (2 Units)

Purpose: Tune the ammonia injection grid to optimize the ammonia distribution for the NOx reduction reaction over the SCR catalyst. A properly tuned AIG will reduce ammonia consumption and maximize the performance of the SCR system.

Notes:

1. This proposal assumes that the ladder on the side of the unit can provide sufficient access to the AIG valves. If a manlift is required, this proposal can be revised to include one.
2. The plant needs to schedule fuel supply such that at least 12 consecutive hours of baseload operation per day are available for AIG tuning.

Scope of Work:

1. Develop the Test Plan:

- 1.1. A test plan will be developed to quantify the impact of ammonia injection grid (AIG) design on ammonia distribution and overall system performance.
- 1.2. Objectives:
 - 1.2.1. Get baseline ammonia distribution at base load.
 - 1.2.2. Get baseline NOx distribution at base load.
 - 1.2.3. Investigate possible catalyst non-performance and temperature and ammonia distribution impact to the system.
 - 1.2.4. Evaluate the impact of AIG design and any hardware issues on SCR system performance.
 - 1.2.5. The test plan will likely be conducted at normal ammonia flows, but lower flows will ideally be used if a variance from the air permit is practical.
- 1.3. At all points, we will measure the following variables unless otherwise stated:
 - 1.3.1. Total NOx concentration
 - 1.3.2. NO/NOx ratio
 - 1.3.3. Ammonia concentration (via NOx difference)
 - 1.3.4. CO concentration
 - 1.3.5. O2 concentration
 - 1.3.6. Temperature

2. On-Site Baseline Testing:

- 2.1. To diagnose system performance issues, we propose comprehensive base load emissions testing at current operating conditions. Results from this part of the test plan will be used to identify mechanical problems with the catalyst systems and ammonia injection grids.
- 2.2. Based on the Test Plan from Task 1, Environex will provide on-site supervision of the stack testing crew to direct the efforts to obtain reliable data on the current NOx, CO, ammonia and temperature profiles in the ducts.

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3. Ammonia Injection Grid Tuning:

- 3.1. Upon completion of Task 2, Environex will compile the data and generate a plan for ammonia grid tuning. This is done while on-site in parallel to the emissions traverse testing of Task 2. The goal of tuning is to balance the ammonia injection to provide optimal performance of the SCR system.
- 3.2. Task 3 is accomplished by a series of spot checks as the AIG header valves are adjusted.
- 3.3. A final traverse at the exit of the SCR after tuning will provide the final NO_x distribution and allow us to determine if any further hardware adjustments are necessary.

4. Report:

- 4.1. The findings from Tasks 2 and 3 will be provided in a summary report following the onsite tuning, once the final data is available from the stack test company.

5. Benefits:

- 5.1. Typically reduces ammonia slip by 20-50% (depending on system design and degree of ammonia maldistribution) corresponding to a decrease of 5-20% in ammonia consumption.
- 5.2. Identify hardware issues with the system (bypass around the catalyst, nonperforming ammonia header valves and spargers, catalyst “dead zones”, plugging of AIG nozzles, improper AIG nozzle design, etc.)

Item #5: Discount

Scope: Savings can be realized if this work is awarded alongside the SCR replacement bid currently scheduled for the same outage. The benefits of combining the scopes will allow for shared scaffolding, equipment and manpower that will reduce costs.

Additionally, an AIG tuning with stack testing is included in both bid packages. If both projects are awarded together, this only needs to be completed once.

The total savings for the scope described above can be found in the pricing schedule below. Please note that this has been included in both bid packages, but the discount will only apply once.

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Pricing Schedule:

Item #:	Description:	# of Units:	Duration (12-hr shifts):	Contract/ Lump Sum Pricing:
1	AIG Lance Supply	2	N/a	\$1,344,386.90
2	AIG Lance Replacement	2	20	
3	Permanent Sampling Grid	2	8	
4	AIG Tuning	2	N/a	
			Taxes (7.5%):	\$100,829.02
5	Discount if awarded in series with: <i>Groome – SPEC25-1635</i>	N/a	N/a	(\$167,600.00)

Schedule:

Dates:	Description:	Milestone Payment Due:
TBD	Receipt of PO	\$184,753.52
TBD	Submittal of drawings for approval	\$163,878.54
TBD	Customer release to fabricate	\$163,878.54
TBD	Ready for Shipment	\$109,252.36
3/8/27	Start AIG Lance Replacement	Start PSG Install
3/15/27	Continuing AIG Lance Replacement	Finish PSG Install
3/27/27	Finish AIG Lance Replacement	\$679,510.47
Post Outage	AIG Tuning	
Post Tuning	Completion of all items	\$143,943.50

The above milestone payments include 7.5% tax.

Sunbiz Status:

Groome Sunbiz registration:
 Doc number M19000009332
 Status Active

Exceptions & Clarifications:

All terms and conditions found in the bid documents will supersede the ones found in this document.

Performance Testing:

As a part of the AIG tuning, stack testing will be performed while the unit is running to confirm the upgrades are operating as intended.

Cancellation schedule for Item 1:

The following cancellation schedule shall apply to this purchase order (Percentages below are cumulative):

After issue of approval drawings	20% of agreement value of contract
After order of major material	20% of agreement value of contract

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After start of fabrication	20% of agreement value of contract
*Once fabrication has started, the additional cost to be based on the amount of work completed at the time of cancellation notice.	
After notice of ready for shop testing	40% of agreement value of contract

Cancellation schedule for all other items:

0% - Any job delay or change in schedule greater than 30 days

25% - 20-30 days written notification

50% - 10-19 days written notification

75% - 0-9 days written notification

Pricing assumes that the Customer will provide the following in a timely manner, as needed:

- Exceptions to this proposal
- Personnel pre-arrival requirements (training, PPE, drug screening)
- Site-specific safety procedures
- Restrooms for use while on site
- Access to drinking water
- 110/220V electricity
- Lockout / tagout support
- Laydown/staging areas
- Waste disposal containers
- Vendor pickup / drop-off assistance
- Unrestricted access to work areas

If our pricing / estimations are not in line with your expectations, please let us know so that we can explore further definition or revision of scope to meet your budgetary needs.

Pricing is based on clear access to work areas and does not include applicable federal, state or local taxes currently in effect. If this project is to be exempt, a certificate must be provided at the time of award. Pricing is predicated on our payment terms of net 30 days. After 30 days, interest charges will be applied monthly at 1.5% and will be reflected on your account.

Pricing is contingent on the acceptance of our standard terms and conditions, as shown below. Pricing does not include any supplemental insurance requirements.

A copy of our standard insurance certificate is available upon request. Additional insurance required for your specific project will be invoiced separately at our cost, plus 10%.

Pricing based on Groome Industrial Service Group completing all work quoted and authorized on customer Purchase Order/Contract. Groome Industrial Service Group will bill customer at the Purchase Order/Contract price regardless of any reduction of the final work scope.

Any additional work above and beyond the initial work scope will require a change order or additional Purchase Order prior to the additional work being performed.

This quote is valid for 30 days from above date. Purchase order number is required before job can be scheduled.

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Respectfully submitted,

Zachary Aroesty

ZA/tal

KP

1151.2/25

Enclosure (Terms & Conditions)



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Scaffold Access Statement

All scaffolding built by Groome workers is subject to the following:

1. The scaffold is only to be used by Groome employees and plant personnel. All plant personnel use must be accompanied by a qualified Groome employee. Advanced notice is requested to ensure project timeliness. Customer scaffold use outside of expected job scope may result in a change order.
2. If any other person requires the use of the scaffold, they must first receive written approval by Groome. Additional costs may apply.

Post Groome Service Emission Issues SOP

If Groome performed emissions system services and upon start-up the plant experiences an issue regarding its emissions systems, the following steps must be taken to ensure the issue is resolved.

Some examples of possible problems are as follows:

1. Stack emissions higher than expected:
 - a. Stack NO_x
 - b. Stack CO
 - c. Ammonia slip
2. High pressure drop through SCR catalyst, CO catalyst or boiler tube bundles.
3. High ammonia consumption.

Groome warrants that all services to be performed will be completed in a thorough workmanlike manner, meet the requirements of the order, and be up to the quality standard of the industry. If any breach of this warranty is to occur, Groome will take all necessary actions to correct the breach. The company shall provide Groome notice of the breach of warranty, in writing, in a reasonable amount of time after the company becomes aware of the breach.

Should any of these problems occur email and cc the following people:

jbause@groomeindustrial.com
 jhawthorne@groomeindustrial.com

shoughton@groomeindustrial.com
 resposito@groomeindustrial.com

In the email, please include a description of the issue and any attempts that have already been made to remedy the issue. Groome will then respond within 3 hours with a short-term action plan.

Operating data and any information regarding the problem needs to be shared with Groome to ensure the proper course of action can be taken. Operating data details should include the following and be submitted as minute-averages for one week prior to the issue:

• Turbine Output	• Ammonia Vaporizer Outlet Temperature
• Turbine Fuel Flow Rate	• CO Catalyst Pressure Drop
• Duct Burner Fuel Flow Rate (if applicable)	• SCR Catalyst Pressure Drop
• Total Exhaust Flow Rate	• Turbine Exit NO _x Concentration (if measured)
• CO Catalyst Operating Temperature	• Turbine Exit CO Concentration (if measured)
• SCR Catalyst Operating Temperature	• Stack CO Concentration
• Stack NO _x Concentration	

Please include units of measure with all data.

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Groome will schedule an all hands meeting within 24 hours to review the problem, determine the potential causes, and present a plan to move forward.

A proper investigation to determine the root cause will be performed. If it is determined that Groome has caused the breach of warranty, Groome will provide the proper services to fix the issue. If the issue was determined to be caused from another source, Groome will provide a recommended repair option.

TERMS & CONDITIONS

Pricing:

Purchase orders are subject to review and acceptance by Groome Industrial Service Group, LLC (GISG).

Terms of Payment:

Our proposal and pricing do not include applicable federal, state, or local taxes currently in effect for states where the work will be performed. All applicable taxes will be noted as a separate line item on our invoice. Upon award, as the client representative, I understand and agree that applicable taxes will be added to our invoice. If this project is to be tax-exempt, a sales tax exemption certificate or a direct pay permit must be provided at the time of award.

Invoices shall be paid net 30 via commercial check, ACH or wire transfer, unless otherwise identified in the proposal. Credit card / purchase card transactions must be arranged prior to award of any work and may result in additional fees. Approved credit card payments must be made net 15. All overdue accounts will be subject to a late charge of 1.5% per month from due date until paid in full.

If total project headcount exceeds 25, Groome will add an EHS Representative and a Superintendent, which will be separately billable.

Questions or disputes with any portion of our invoicing shall be clearly communicated in writing (email acceptable) within 15 days of invoice date. Extensions to due date will be considered on a case-by-case basis and will be based on the nature of the dispute, timeliness of the inquiry, and response time.

Limitation of Liability:

GISG shall not be responsible for the acts, omissions or workmanship of the employees, contractors, subcontractors, suppliers or agents of the Customer. GISG shall not be liable to the Customer for any loss, injury, or illness to persons or property caused by the negligence of the Customer, its employees, contractor, suppliers or their employees, agents or sub-contractors. In no event shall GISG be liable, whether arising under contracts, tort (including strict liability and negligence) or otherwise, for loss of anticipated profits, loss by reason of plant shutdown, non-operation or increased expense of operation, service and erection, cost of purchase of replacement power, or for any specific, indirect, incidental or consequential loss or damage of any nature arising at time or from any cause whatsoever.

Indemnification / Hold Harmless Clauses:

GISG will defend, indemnify and hold harmless the Customer from and against all damages, claims, liability, losses and expenses, including attorney's fees, for injury or death to persons or damage to property of others arising out of or resulting from any negligent act or omission of Contractor, its agents, employees, suppliers or subcontractors.

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411 McKinney Parkway

McKinney, Texas 75071

PHONE : 214-544-9500

FAX : 214-544-9532

email : sales@vectorsystems-usa.com

Groome Industrial
Phone: (919) 357-8590

Date: December 15, 2025

Email: kperez@groomeindustrial.com

Attn: Kevin Perez

VSI Quote: 25Q0341-01

Ref: **JEA Brandy Branch AIG Lance Upgrade**

Refer to our proposal to supply one (1) ammonia injection grid upgrade shipped loose and ready for assembly.

Item	Qty	Description
1	1	<u>KATANA™ Ammonia Injection Grid Upgrade</u> <i>-Delivery estimated 20 weeks ARO</i> - Engineered to fit into current casing and improve Ammonia-NOx Distribution - Twenty-two (22) AIG lance assemblies proposed. Eleven (11) assemblies per side of duct. Each assembly will consist of four (4) 2" OD 304SS SCH 40 SMLS lances. A total of eighty-eight lances are proposed. - The following items, for the manifold assemblies, will be shipped loose for field installation by others: - Two (2) pressure gauges; one per manifold inlet - Twenty-two (22) 304SS orifice plates - Forty-four (44) ½" NPT SS needle valves - Twenty-two (22) 2" SS isolation gate valves - Twenty-two (22) differential pressure indicators - Necessary gaskets, nuts, and studs

F.O.B. Point of Manufacturer. McKinney, Texas. USA

Delivery: 20 Weeks **After Approval to Fabricate****Exceptions & Clarifications:**

- All structural welding conforms to AWS D1.1 & D1.6 as applicable
- All pipe and pipe fittings to conform to ANSI standard. All welding on the pipe and pipe fittings complies with ASME Code. B31.1.
- Electrical classification is **Non-Hazardous**.
- Vector standard mfg. valves have been proposed.
- Pricing does not include freight/shipping to jobsite.
- After the acceptance of our proposal and award of the purchase order, if additional engineering documents or specification(s) are added to the project, it may constitute a change order. They must be documented and approved before Vector proceeds to implement any changes to the order.
- VSI takes exception to all specifications and documents referenced in RFQ but not supplied with the proposal package.
- INCURRED FOR PAST DUE, UNPAID INVOICE AMOUNTS:** With respect to any unpaid amount on any invoice not paid in full within the net terms as defined on the original quote and proposal, a finance charge of 1.5% per month, payable from the date

of the invoice to the date payment is received, shall be due and payable from the Buyer. In addition, Buyer shall indemnify the Seller for any costs, including but not limited to reasonable attorneys' fees and disbursements, incurred by Seller to collect any unpaid amount(s).

9. Quote and design based on the following documents/specifications:
 1. 1412022250 Appendix A – Technical Specifications.pdf
 2. 541M005 AIG.pdf

Other Deliverables:

Drawing Package for approval submitted eight (8) weeks depending on date of order, consisting of items 1-4. Package includes initial submittal and two subsequent revision submittals. Additional revision requests may constitute a change order:

1. P&ID
2. General arrangement drawings
3. Component specification & data sheets
4. Customer documentation required as defined in specifications.
5. One (1) electronic copy on CD of Operation & Maintenance Manuals will be shipped two (2) weeks after equipment.

Progress Performance Payment Terms (Net 30 days) Negotiable:

20%	Upon Receipt of P.O.
30%	Upon Submittal of drawings for approval
30%	Upon customer release to Fabricate.
20%	Upon Ready for Shipment

Warranty:

The equipment is guaranteed 18 months after shipment or 12 months after installation; whichever period expires first. The extent of the warranty includes replacement or correction of defective components at the discretion of VSI personnel and is limited to material only. Records must be documented and show proof of proper scheduled maintenance as listed in OEM manuals pertaining to all skid components. The warranty on the equipment does not guarantee against abrasion, erosion, and wear, nor does the warranty cover any damage resulting from mis-operation or improper maintenance of the unit as described in the OEM for this project. Warranty is voided if the system is not operated and maintained in accordance with the Operation & Maintenance Manual or any unauthorized installations, alterations, or damage to the original equipment provided by VSI. Any repair or replacement performed under warranty only includes the remaining warranty duration from the original warranty. See VSI's standard terms and conditions for further clarification.

Cancellation Schedule:

The following cancellation schedule shall apply to this purchase order (Percentages below are cumulative):

After issue of approval drawings	20% of agreement value of contract
After order of major material	20% of agreement value of contract
After start of fabrication	20% of agreement value of contract
Once fabrication has started, the additional cost to be based on the amount of work completed at the time of cancellation notice.	
After notice of ready for shop testing	40% of agreement value of contract

Validity:

This Quotation is valid until February 15, 2026.

This quotation is based on Vector Systems, Inc.'s standard offering for these components. We

reserve the right to adjust the pricing based upon changes that may appear in the final engineering design package approved by the customer.

We appreciate the opportunity and look forward to working with you on this project. If you have any questions, or if I can be of any assistance, please contact me at your convenience.

Thank you,

Michael Frazee

Michael Frazee

Key Account Executive – Retrofit Sales

936.537.4794

mfrazee@vectorsystems-usa.com

The Vector Systems KATANA™ AIG

Using our patented design software we optimize lance orifice sizing, spacing, and layout to match site-specific duct conditions and gas flow patterns. This improves ammonia distribution, enhances NOx reduction, and reduces susceptibility to plugging—enabling:

- Maximized NOx reduction with minimal NH3 slip, helping to better maintain regulatory compliance
- Extends catalyst life by improving reagent mixing and distribution across entire area of catalyst
- Reduces downtime and maintenance time resulting from plugged AIG holes
- Achieves better NOx reduction performance within existing footprint

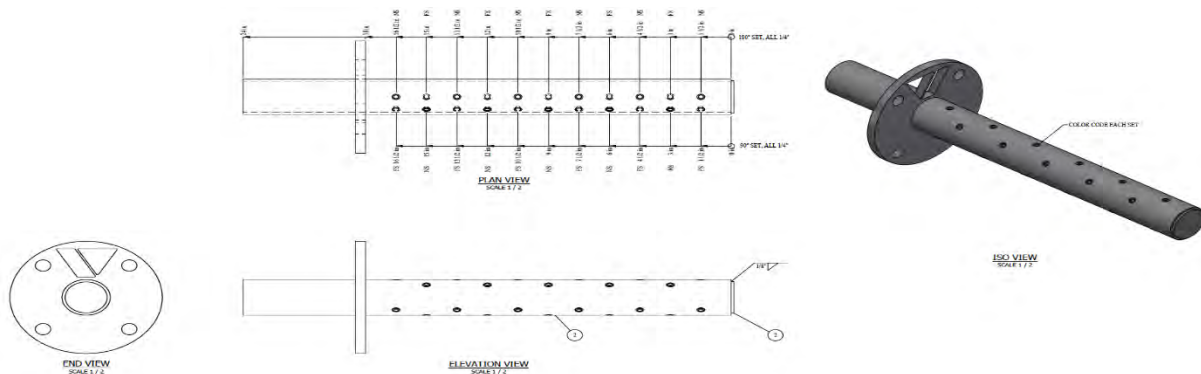


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ENVIRONMENTAL, HEALTH & SAFETY MANUAL

**KinetiClean
HRSG Maintenance Services
Refinery Maintenance Services
Industrial Cleaning & Support Services
Surface Preparation & Coating Services
Door & Mechanical Systems**

CORPORATE HEADQUARTERS

305 PALMER ROAD

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INTRODUCTION TO THE EHS MANUAL

This Environmental, Health & Safety (EHS) Manual has been designed to help new and current employees familiarize themselves with Groome's policies, procedures and business culture. Other aspects of employment with our company which do not appear should be addressed with your immediate supervisor or EHS Department.

Wherever this manual states "The Company" or "Company" it means Groome Industrial Service Group, LLC, to include physical worksites. Employees who work at client locations may have other policies that are also to be abided by.

Groome will always try to give employees notice when a policy or procedure is expected to be changed. However, the Company may choose for its own reasons at any time and with no prior notice to change, suspend, delete, add, remove or otherwise modify any or all content in this manual to meet legislative, economic, financial or other conditions as needed. The regulations and benefits required by law will always remain in force. In addition, any provision in this EHS Manual found to be unenforceable and invalid, such finding does not invalidate the entire EHS Manual, but only that particular provision.



SAFETY POLICY

Groome firmly believes that incident prevention is the cornerstone of a safe work environment. **The health and welfare of our employees and all stakeholders who touch our work are of the utmost importance to the company.** We believe in a '360°' approach to safety such that employees at all levels of the company are responsible for contributing to the overall safety culture. Our employees participate in our world-class safety training program on a recurring basis.



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Stop:

We **expect** each employee to stop the job when he or she perceives something to be unsafe. The newest or most inexperienced employee has the same right and responsibility to exercise Stop Work Authority (SWA) as the most senior, experienced executive of the company.



Take 5:

Each employee is **empowered** to “take five” minutes as often as necessary to refocus attention on awareness of hazards around us and observe the work area to assess – and reassess – for hazards and confirm that effective risk control measures are fully implemented.



Act:

Once we see something at risk, we take **immediate action** by engaging the relevant stakeholders who can address it. Groome employees understand that a safe workplace starts with our own actions.



Record:

Through **documentation**, we share our observations and corrective actions to enable the company to track, trend, and share best practices and lessons learned to prevent incidents, injuries, and illnesses. This practice most importantly ensures everyone gets home safely.



Start:

We **resume work cautiously** and are always mindful of the potential for changing circumstances that would warrant our repeating this process as often as necessary.

*Safety is a core value at Groome and will remain uncompromised by scheduling constraints, weather, deadlines, or profit margin. By continuously perfecting this exercise, we shine brightly as safety **STARS!***

Jeff Bause

President & CEO

Groome Industrial Service Group

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Purpose

The purpose of this program is to provide safe guidelines for the operation and maintenance of abrasive blasting equipment and their related components.

Scope

This program covers all employees involved in abrasive blasting jobs performed by the company. Whenever hazardous substances such as dusts, fumes, mists, vapors, or gases exist or are produced, their concentrations shall not exceed the limits specified in 1926.55(a) (Gases, Vapors, Fumes, Dusts and Mists). When ventilation is used as an engineering control method, the system shall be installed and operated according to the requirements of CFR 1926.57 (Ventilation).

Key Responsibilities

Supervisors

- Be aware of potentially hazardous conditions that may arise during the blasting process prior to starting any blasting job and must take measures to protect employees.
- Ensure that all employees are trained on related safety topics.
- Understand the importance of regularly scheduled maintenance for continued safe operation of blasting equipment. Ensure that all employees comply with this policy and all other related policies.

Blasting Employees

- Be familiar with the safe operating functions of blasting equipment to be used on a job.
- Comply with all company policies.
- Have knowledge of hazards associated with respirable silica.
- Understand they are prohibited from using compressed air for cleaning unless the pressure is reduced to less than 30 pounds per square inch and be equipped with effective chip guarding and proper PPE.

Procedure

General

Abrasives and the surface coatings on the materials blasted are shattered and pulverized during blasting operations and the dust formed will contain particles of respirable size. The composition and toxicity of the dust from these sources shall be considered in making an evaluation of the potential hazards.

Silica Dust

- Many types of abrasive materials have varying degrees of hazards--silica sand being probably the most hazardous mineral abrasive used.

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- **Silica sand shall NOT be used as an abrasive medium.**
- The PEL for particles not otherwise regulated is 5.0 mg/m³. The PEL for respirable dust containing crystalline silica is determined by the below formula:

PEL = 10 mg/m³ (%SiO₂+2), where %SiO₂+2 refers to the amount of crystalline silica measured in the sample. Below the above threshold limits, no action is required; however, employees may wear dust masks for personal comfort.

Symptoms of Silicosis:

Silicosis (especially the acute form) is characterized by shortness of breath, fever, and cyanosis (bluish skin); it may often be misdiagnosed as pulmonary edema (fluid in the lungs), pneumonia, or tuberculosis. Severe mycobacterial or fungal infections often complicate silicosis and may be fatal in many cases.

Three types of Silicosis:

- Chronic Silicosis: usually occurs after 10 or more years of exposure to crystalline silica at relatively low concentrations.
- Accelerated Silicosis: results from exposure to high concentrations of crystalline silica and develops 5 to 10 years after the initial exposure
- Acute Silicosis: occurs where exposure concentrations are the highest and can cause

NIOSH Safety Recommendations:

NIOSH recommends the following measures to reduce crystalline silica exposures in the workplace and prevent silicosis and silicosis-related deaths:

- Prohibit silica sand (or other substances containing more than 1% crystalline silica) as an abrasive blasting material and substitute less hazardous materials.
- Conduct air monitoring to measure worker exposures.
- Use containment methods such as blast-cleaning machines and cabinets to control the hazard and protect adjacent workers from exposure.
- Practice good personal hygiene to avoid unnecessary exposure to silica dust.
 - o Wash hands and face before eating.
 - o No eating, drinking or tobacco products in the blasting area.
 - o Shower before leaving work site.
 - o Vehicles parked away from contaminated area.
- Wear washable or disposable protective clothes at the worksite; shower and change into clean clothes before leaving the worksite to prevent contamination of cars, homes, and other work areas.
- Use respiratory protection when source controls cannot keep silica exposures below the NIOSH REL.
- Provide periodic medical examinations for all workers who may be exposed to crystalline silica.
- Post signs to warn workers about the hazard and to inform them about required protective equipment.
- Provide workers with training that includes information about health effects, work practices, and protective equipment for crystalline silica.

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- Report all cases of silicosis to the state health department as well as OHSA.

Other

- Other types of abrasives include: synthetic or natural mineral grains; metallic shot or hard grit (made of steel or chilled cast iron); and organic abrasives such as ground corncobs and walnut shells. These and other engineering controls such as containment and ventilation are important for employee safety.
- The hazards of steel or cast iron dust are relatively minimal; however, combustible organic abrasives may be pulverized fine enough to be capable of forming explosive mixtures with air. The coatings that are being blasted may, for example, contain lead (in paints); arsenic (in furnaces); cadmium (plating); and even silica sand (embedded in the surface of castings). All these types of hazards require specific respiratory protection and are serious health hazards.
- Dust shall not be permitted to accumulate on the floor or on ledges outside of an abrasive blasting enclosure. Dust spills shall be cleaned up promptly. Aisles and walkways shall be kept clear of steel shot or similar abrasives which may create a slipping hazard.

Sandblasting

- There may be times during sandblasting operations that hazardous dusts are released into the atmosphere that exceed the concentrations specified in the "Threshold Limit Values of Airborne Contaminants for 1970" of the American Conference of Governmental Industrial Hygienists, listed below:

MINERAL DUSTS	
Substance	(a)mppcf
SILICA Crystalline Quarts Threshold Limited calculated from the formula Cristobalite. Amorphous, including natural diatomaceous earth	(b)(250) ÷ (%SiO ₂ +5) 20
SILICATES (Less than 1% crystalline silica)	
Mica	20
Portland Cement	20
Soapstone	20
Talc (non-abestiform)	20
Talc (fibrous), use asbestos limit	

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INERT OR NUISANCE PARTICULATES Note 1 Covers all organic and inorganic particulates not otherwise regulated. Same as Particulates Not Otherwise Regulated. Note 2 Inert or Nuisance Dusts includes all mineral, inorganic, and organic dusts as indicated by examples in TLV's Appendix D.	50 (or 15 mg/m ³ which-ever is the smaller) of total dust <1% SiO Note 1 See Table above
a. Millions of particles per cubic foot of air, based on impinger samples counted by lightfield techniques. b. The percentage of crystalline silica in the formula is the amount determined from airborne samples, except in those instances in which other methods have been shown to be applicable.	

Note: To reduce employee exposure to below the above TLV's, administrative or engineering controls must first be implemented whenever feasible. When such controls are not feasible to achieve full compliance, protective equipment or other protective measures shall be used to keep the exposure of employees to air contaminants within the limits prescribed in this section. Any equipment and technical measures used for this purpose must first be approved for each particular use by a competent industrial hygienist or other technically qualified person.

Equipment Handling

Follow these guidelines when moving blasting equipment to prevent back strains and crushing injuries:

- Use a forklift, crane or other type of lifting device for transporting a blast machine; always use a lifting device when the machine contains abrasive.
- Never manually move a blast machine where abrasive has been spilled on hard surfaces or on a wet or slippery surface.
- Never attempt to manually move a blast machine containing abrasive.
- Always disconnect hoses from machines to avoid interference during moving.

Air Compressors

- Air compressors must be located in a well-ventilated area. It must be able to contain large volumes of clean, toxicant-free air. This means the compressor must be placed up wind from the blasting operation and out of the range of dust and flying abrasives.
- Due to the high pressure that air compressors create, precautions must be taken to prevent unleashing of strong forces that can cause serious bodily injury.
- Air for abrasive blasting respirators must be free of harmful quantities of dust, mists, or noxious gases and must be inspected daily, prior to use and comply with CFR 1910.134(I) (Respiratory Protection).
- Never adjust the pressure setting on a compressor above the blast equipment maximum working pressure rating. The maximum working pressure rating is indicated on the manufacturer's metal identification plate.
 - Under no circumstances are employees to use compressed air for cleaning unless the pressure is reduced to less than 30 psi [10 psi in California]. Flying debris can injure the employee or a fellow

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worker.

- All safety and standby devices will be maintained in working order such as alarms to warn of compressor failure or overheating. Compressors will be located so that contaminated air does not enter the system and suitable
- in-line filters will be installed. A receiver of sufficient capacity to enable the respirator wearer to escape from a contaminated atmosphere in the event of a compressor failure shall be in place. If an oil lubricated system is used, it shall have a high temperature and carbon monoxide alarm.
- Additionally, we will ensure that compressed air does not have oxygen concentrations that are greater than 23.5%.
- Compressors used to supply breathing air to respirators must be constructed and situated so as to:
- prevent entry of contaminated air into the air-supply system.
- minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (5.56 deg.C) below the ambient temperature.
- have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions.
- have a tag containing the most recent change date and the signature of the person authorized by the employer to perform the change. The tag shall be maintained at the compressor.
- For compressors that are not oil-lubricated, we will ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.
- For oil-lubricated compressors, we will use a high temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply will be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.

Blast Pot

- Position blast pots and/or compressors on level ground. Machines operate best when they sit on level surfaces.
- For communication purposes place blast pot between the compressor and the surface to be blasted. This will enable the pot attendant and operator to make visual contact.
- All couplings and pipefitting on the blast pot, compressor and hoses must be airtight.
- Blast pots must be inspected daily prior to use.

Hoses and Connectors

- Couplings must have safety wires in place and be secure as required by federal safety regulations. The operator shall be responsible to ensure that each coupling has safety wires in place.
- Whip checks must be installed at bull hose connections.
- Operator should hold onto the blast hose until the air pressure from the nozzle drops off to zero.
- Do not use hoses with soft spots.
- Never use tape to repair a blown-out hose.
- Immediately replace a hose if a blowout or leak occurs.
- Hose ends must come into contact with coupling gaskets to prevent leaks and to maintain static electricity conductivity.

Nozzles and Remote Controls

- Blast nozzles shall be bonded and grounded to prevent the buildup of static charges. Where flammable or explosive dust mixtures may be present, the abrasive blasting enclosure, the ducts, and the dust collector shall be constructed with loose panels or explosion venting areas, located on sides away from any

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occupied area, to provide pressure relief in case of explosion following the principles set forth in the National Fire Protection Association Explosion Venting Guide. NFPA 68-1954.

- Organic abrasives which are combustible shall be used only in automatic systems.
- Blast cleaning nozzles shall be equipped with an operating valve which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.
- All blast machines must be equipped with remote control systems to start and stop the blasting process.
- Never tape, strap, or tie down an air actuated remote-control lever or choke electric remote-control switch.
- If there is the slightest delay in reaction time of the handle lever or lever lock to open, check for dust and dirt build-up around pivot pins before resuming blasting. Also, test the tension on the lever springs, and replace them immediately if they do not respond rapidly.
- Substituting component pieces with other manufacturer's parts is not allowed.
- Inspect blast nozzles for wear and cracks on the inner liner. When a nozzle orifice is worn 1/16" larger than its original size, it should be replaced.
- Check nozzles and nozzle holders for deterioration of thread form. Threads on nozzles and their companion holders must not be cross-threaded, worn or distorted.
- Hoses that are being tied and lifted to blasting operations being conducted above grade, i.e., scaffolds, shall be depressurized to prevent accidental start-up.

Environmental Controls

- Organic abrasives which are combustible shall be used only in automatic systems. Where flammable or explosive dust mixtures may be present, the construction of the equipment, including the exhaust system and all electrical wiring, shall conform to the requirements of American National Standard Installation of Blower and Exhaust Systems for Dust, Stock, and Vapor Removal or Conveying, Z33.1-1961 (NFPA 91-1961), and Subpart S of 1926.57 (Ventilation).
- The work area must be inspected for exterior electrical power lines that may endanger operators.
- Operators should use care to avoid directly blasting power lines and insulators.
- Do not blast in atmospheres that contain flammable fumes.
- Take precautions at the work site to eliminate hazardous surface obstacles that may cause tripping hazards or interfere with worker mobility.
- Adequate ventilation must be provided for employees working within enclosures.
- Never operate compressor if hoses are frozen. When winter temperatures drop below freezing, check for ice prior to pressurizing hoses.
- Provide adequate drinking water for operators, especially during summer.

Operator Signals

- On the job site, voice communication is often impossible. Even shouts cannot be heard over the noise of compressors and blasting. In addition, the operator's head will be enclosed in the helmet, which blocks out sound and limits vision. For these reasons, an industry wide standard set of hand and sound signals has been developed.
- Signals may be visual hand movements, flashing light, pulls on a rope or sounds made by banging a hammer or using a horn or electric buzzer.
- Every operator must become familiar with the signals to be used on the jobsite.

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Personal Protective Equipment

- Secure hoses by tying them to scaffolding or personnel platforms, when working from elevations, to prevent injury from hoses falling on other personnel working below or near blasting area.
- Before using any blasting abrasive, check the SDS to find out the chemical composition of the abrasive material.
- Equipment for the protection of eyes, face and body shall be supplied to the operator when the respirator design does not provide such protection and to any other personnel working in the vicinity of abrasive blasting operations. This equipment shall conform to the requirements of 1926.102 (Eye and Face Protection).
- Ventilation systems and dust collectors may be necessary in enclosed conditions.
- Noise from abrasive blast nozzles can be loud enough to damage the hearing of blasters and others on the work site. Workers must not be exposed to noise levels exceeding 85 decibels as an eight-hour time weighted average (85 dBA TWA), therefore all blasters shall wear hearing protection (earplug & earmuff).
- Blasters must wear heavy-duty gloves and steel toe boots.
- Helmet lenses should be changed as soon as pitting or frosting takes place.

Respirator Use

- Type CE abrasive-blast supplied-air respirators are the only respirators suitable for use in abrasive-blasting operations. Currently, there are four kinds of Type CE abrasive-blast respirators certified by NIOSH. These four kinds of respirators and the NIOSH recommended assigned protection factors (APF) are:
 - a continuous-flow respirator with a loose-fitting hood and an APF of 25;
 - a continuous-flow respirator with a tight-fitting facepiece and an APF of 50;
 - a positive-pressure respirator with a tight-fitting half-mask facepiece and an APF of 1000;
 - a pressure-demand or positive-pressure respirator containing a tight-fitting full facepiece and an APF of 2000.

Note: Air purifying and powered-air purifying respirators are not recommended for abrasive blasting operations but may be suitable for auxiliary work such as outside clean-up operations.

- A specific work-site procedure shall be developed where CE blasting hoods/helmets are required to protect the health of the operator. The procedure shall comply with CFR 1926.103 (Respiratory Protection).
- Equipment for the protection of eyes, face and body shall be supplied to the operator when the respirator design does not provide such protection and to any other personnel working in the vicinity of abrasive blasting operations. This equipment shall conform to the requirements of 1926.102 (Eye and Face Protection).
- Protection shall be provided to any other personnel working in the vicinity of abrasive blasting operations.
- If cylinders are used to supply breathing air to respirators, they will meet the following requirements:
 - Cylinders will be tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 and part 178);
 - Cylinders of purchased breathing air will have a certificate of analysis from the supplier that the breathing air meets the requirements for Grade D breathing air; and
 - The moisture content in the cylinder will not exceed a dew point of -50 deg. F (-45.6 deg. C) at 1 atmosphere pressure.

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Purpose

To establish procedures to ensure right of access to relevant exposure and medical records to employees and/or their designated representatives.

Scope

This policy shall apply to all operations. This section applies to all employee exposure and medical records, and analysis thereof, made or maintained in any manner, including on an in-house or contractual (e.g., fee-for-service) basis.

- Upon written request, an employee, former employee, designated representative and/or Department of Commerce Compliance Officer has the right to examine and receive copies of medical records, exposure records, and any analysis based on these records. An employee may designate any individual or organization by means of a written authorization to exercise the right of access to such records.
- Recognized collective bargaining agents who have statutory authority to represent the interests of the employees within the bargaining unit are automatically considered designated representatives. While these representatives do not have the right to secure individual medical records without written consent of the employee, they have the right of access to employee exposure records and analysis without employee consent.

Key Responsibilities

EHS MANAGER/ EHS SPECIALIST(S)

- Develops local medical records practices for all worksites in accordance with this procedure and ensures employees are aware of the requirements of this procedure.
- Responsible for the review, implementation and maintenance of the local worksite medical records procedure.

MANAGERS

- Responsible for the implementation and maintenance of the medical records procedure for their facility and ensuring all assets are made available for compliance with the procedure.

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EMPLOYEES

- All shall be familiar with this procedure and have access to their records.

Definitions

- Access means the right and opportunity to examine and copy.
- Analysis of exposure or medical records means any compilation of data, and research, or other studies based, at least in part, on information collected from individual employee exposure or medical records or other sources including information from health insurance claim forms provided that either the analysis must have been reported to the employer or no further work is being done by the person responsible for preparing the analysis.
- Designated representative will mean any individual or organization to which an employee gives written authorization to exercise a right of access. For the purposes of access to employee exposure records and analysis using exposure or medical records, a recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.
- An exposure record contains any of the following kinds of information concerning employee exposure to various substances or physical agents used in the workplace.
 - Workplace monitoring or measuring of a toxic substance or harmful physical agent including personal, area, grab, wipe, or other forms of sampling and includes related collection and analytical methods, calculations and other background data relevant to interpretation of results obtained.
 - Biological tests which directly assess absorption of a toxic substance or harmful physical agent into the body. A biological test which assesses the effect of the body would be a medical record.
 - A Material Data Safety Sheet indicating that the material may pose a hazard to human health.
 - Any other record which identifies a toxic substance or physical agent as potentially toxic or harmful and reveals where and when it was used.
- A medical record is any record concerning the health status of an employee made or maintained by a doctor, nurse, or other health care professional or technician. This includes:
 - Medical and employment questionnaires or histories including past descriptions and occupational exposures.
 - The results of any medical exam (pre-employment, pre-assignment, periodic or episodic), and any laboratory tests (x-ray and all biological monitoring).
 - Medical opinions, diagnosis, progress notes and recommendations.
 - Description of treatments and prescriptions.
 - First aid records.
 - Employee medical complaints.

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- NOTE: The following will not be considered a medical record.
- Physical specimens, such as blood or urine samples, which are routinely discarded.
 - Health insurance claims, accident investigation reports and other non-medical correspondence if maintained separately from the medical file.
 - The record of any voluntary employee assistance program (alcohol, drug, etc.) if maintained separately.
 - Records created solely in preparation for litigation which is privileged from discovery under applicable rules of procedure or evidence.

- Specific Written Consent means a written authorization containing the following:
- The name and signature of the employee authorizing the release of medical information.
 - The date of the written authorization.
 - The name of the individual or organization that is authorized to release the medical information.
 - The name of the designated representative (individual or organization) that is authorized to receive the released information.
 - A general description of the medical information that is authorized to be released.
 - A general description of the purpose for release of the medical information.
 - A date or condition upon which the written authorization will expire (if less than one year).

- A toxic substance or harmful physical agent is defined as any chemical substance, biological agent (bacteria, fungus, virus, etc.) or physical stress (noise, heat, cold, ionizing radiation or non-ionizing radiation, hypo or hyperbaric pressure, etc.) which:
- Is regulated under federal law or rule due to a hazard to health.
 - Is listed in the National Institute of Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS).
 - Shows positive evidence of acute or chronic health hazard in human, animal or other biological test by or known to the employer.
 - Has a Material Safety Data Sheet indicating that the substance may pose hazard to human health.

Procedure

The HR Department will maintain applicable medical and exposure records for all employees. All requests to access medical and exposure records and analysis based on those records must be submitted using the forms provided for that purpose.

The HR Department will assure access of each employee and/or their designated representative, to all exposure and medical records concerning the employee's work conditions or workplace within 15 working days from the day request is made. If the records cannot be provided within 15 working days, the employee or designated representative requesting the record shall be informed with the reason(s) for the delay and the earliest date when the record(s) can be made available.

Except for a recognized collective bargaining agent, any designated representative must have the employee's written permission for access to exposure records and analyses. It is necessary however, if applicable, for a union representative to

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specify the occupational need for access to records absent the employee's consent. Union representatives must have the employee's written permission to access medical records.

Employees or their representatives will be provided with one copy of the records at no cost or free use of a copying machine. There will also be no charge for the first request for information by a recognized collective bargaining agent, even if the employee has previously received a copy of the same record. Additional copies will be provided at a cost of five cents per copy. Each copy provided will be stamped with the word COPY. At no time will original records and/or x-rays be loaned out to enable the requesting party to make a copy.

Any review of medical or exposure records by an employee or union representative shall be done on his or her own time, outside of normal working hours, at a time mutually agreeable to the parties. The review will be conducted in person with the individual requesting access to the records.

The employee is entitled access to his or her medical records except when a physician determines that this knowledge would be detrimental to the employee's health as in such cases of terminal illness or psychological conditions. However, if the employee provides a designated representative with specific written consent, access

to medical records must be provided even if the physician has denied the employee access to the records.

The agency/facility will provide the Compliance Officer with immediate access to employee exposure and medical records. In most cases, the Department of Commerce must provide a written access order which must be posted for 15 days before personally identifiable medical records are copied. A copy of the written access order will be provided to the union if applicable.

The authorized physician, nurse or other responsible health care personnel maintaining employee's medical records may delete the identity of anyone who has provided confidential information concerning the employee's health status but cannot withhold the information itself.

When an analysis of medical records identifies the employee, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

Copies of exposure records of other employees with past or present job duties or working conditions like or similar to those of the employee will also be provided upon request.

Any employee or designated representative is also permitted access to any record of exposure information which pertains to a new workplace or condition(s) to which the employee is being assigned or transferred.

Records Retention

Employee medical records, except first aid records of minor scratches, cuts, burns, etc. and separately maintained health and workers' compensation claim records shall be maintained for at least the duration of employment plus 30 years.

If the company (Company) was ceasing to do business, the company shall transfer all records subject to this section to the successor employer. If the company is ceasing to do business and there is no successor employer to receive and maintain the records, or intends to dispose of any records required to be preserved for at least thirty (30) years, the company shall notify affected current employees of their rights of access to records at least three (3) months prior to the cessation of the employer's business.

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ACCESS TO MEDICAL RECORDS			Revision No.	4	
			Next Revision Date:	8/01/2025	
Preparation: Chris Lynn	Authority: Vice-President-EHS	Issuing Dept: EHS	Page:	5 of 7 - 5 - Page 5 of 7	

Employee exposure records shall be preserved and maintained for at least thirty (30) years, except that:

- Background data to environmental (workplace) monitoring or measuring, such as laboratory reports and worksheets, need only be retained for one (1) year as long as the sampling results, the collection methodology, (sampling plan), a description of analytical and mathematical methods used, and a summary of other background data relevant to interpretation of the results obtained are retained for at least thirty (30) years; and
- Safety Data Sheets and any other records concerning the identity of a substance or agent need not be retained for any specified period as long as some record of the identity (chemical name if known) of the toxic substance or harmful physical agent, where it was used, and when it was used is retained for at least thirty (30) years.
- Any analysis of medical records or exposure records will be retained for thirty (30) years.
- Only chest x-rays must be kept in the original form. All other records may be retained in any retrievable form.
- Biological monitoring results designated as exposure records by specific occupational safety and health standard shall be preserved and maintained.

Employee Information

Upon an employee's first entering into employment, during new employee orientation training, the EH&S Officer provides information to new employees regarding the existence, location, availability and the person responsible for maintaining and providing access to records and each employee's rights of access to these records. The HSE Department will provide each new employee and all current employees and at least annually thereafter the following information:

- The existence of, location and availability of covered records.
- The name of the individual maintaining and providing access to these records.
- The right of every employee to access these records.

The Access to Employee Exposure and Medical Records Standard (29 CFR 1910.1020) will be readily available for review by employees upon request.

The EH&S Manager will distribute to all current employees any new informational material pertaining to this standard made available to the Department of Commerce.

A copy of the employee notice that will be used to comply with the employee information requirements is included with the policy. This notice will be posted on those bulletin boards where other notices normally appear (Page 7).

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			Revision Date:	
VACUUM TRUCKS			Revision No.	
			Next Revision Date:	10/01/2025
Preparation: Chris Lynn	Authority: Vice-President-EHS	Issuing Dept: EHS	Page:	7 of 7 - 7 - Page 7 of 7

ACCESS TO MEDICAL/EXPOSURE RECORDS NOTICE

Federal Regulation 29 CFR 1910.1020 requires us to inform you that our Company does keep records designated as Employee Exposure and Employee Medical Records.

The above regulation gives you the right to review those records with certain exceptions. The

records are maintained by the EHS Department and they are responsible for the records. A copy of

CFR 1910.1020 is available for viewing upon request to the EHS Manager

Signature

Date

Note: This notice must be posted annually.

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			Next Revision Date:	8/01/2025
Preparation: Chris Lynn	Authority: Vice-President-EHS	Issuing Dept: EHS	Page:	Page 1 of 4

Purpose

The purpose of this procedure is to advise employees in areas where ammonia is being used and to supply on an awareness level basis about the properties and hazards of Anhydrous Ammonia, general guidelines and training requirements.

Scope

This procedure applies to Company operations where employees whose work activities may involve working with or around Anhydrous Ammonia. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

MANAGERS AND SUPERVISORS

- In coordination with the EHS Manager, develop and implement ammonia awareness training.
- Ensure personnel are aware of work that has the potential of exposure to ammonia.
- Identify possible locations where ammonia in the workplace may be used.
- Inform the EHS Manager of upcoming work involving ammonia, allowing the EHS Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the ammonia awareness requirements.

SAFETY MANAGER:

- Coordinate annual ammonia awareness training activities.

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EMPLOYEES:

- Comply with the ammonia awareness requirements and direct any questions or concerns to the EHS Manager.
- Attend required annual training.

Procedure

CHARACTERISTICS OF ANHYDROUS AMMONIA

Appearance

Anhydrous Ammonia is a colorless gas under normal conditions. It can be a liquid under pressure. It has a pungent, suffocating odor. Anhydrous Ammonia is attracted to water and at ambient temperature is mainly a gas.

Description

Ammonia refers to solutions that are 50% ammonia or greater, ammonia anhydrous, and ammonia anhydrous liquefied, unless otherwise specified. Ammonia is a toxic gas or liquid that, when concentrated, is corrosive to tissues upon contact. Exposure to ammonia in sufficient quantities can be fatal. One of the highest production

volume chemicals in the U.S., concentrated ammonia is used in manufacturing, refrigeration, and agriculture (as a fertilizer). Household ammonia is much less concentrated; it rarely causes burns, but it does cause irritation. The lowest level at which humans can detect the odor of ammonia (odor threshold) generally provides sufficient warning of exposure; however, persons with prolonged exposure to ammonia will lose their ability to detect the odor (olfactory fatigue). Ammonia commonly exists as part of a solution.

Health Effects of Anhydrous Ammonia

Some of the potential health effects of ammonia such as burning of the eyes, temporary blindness, coughing, chest pain, etc. Exposure of the eyes to ammonia may cause burning, tearing, temporary blindness and severe eye damage. Exposure of the skin to ammonia may cause severe burns and blistering. Exposure of the respiratory tract (mouth, nose and throat) to ammonia may cause runny nose, coughing, chest pain, severe breathing difficulties, severe burns and death.

Possible ways employees may be exposed to Anhydrous Ammonia during their job functions. Some examples may include, but not limited to:

- Working on/near industrial refrigeration machinery rooms, equipment and/or piping;
- Working in petroleum refineries; or
- Working with/near agricultural fertilizer.

Methods of Dissemination:

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- Indoor Air: Ammonia can be released into indoor air as a liquid spray (aerosol) or as a vapor.
- Water: Ammonia can be used to contaminate water.
- Food: Ammonia is unlikely to contaminate food due to unpalatable qualities rendered to food.
- Outdoor Air: Ammonia can be released into outdoor air as a liquid spray (aerosol) or as a vapor.
- Agricultural: If ammonia is released into the air as a liquid spray (aerosol), it has the potential to contaminate agricultural products. If ammonia is released as a vapor, it is highly unlikely to contaminate agricultural products.

Routes of Exposure

Anhydrous Ammonia can cause harm if inhaled and/or if it comes into contact with the eyes or skin. High concentrations of ammonia gas, liquid ammonia and solutions of ammonia can cause harm if inhaled or if they come into contact with eyes or skin.

PRE-JOB PLANNING FOR AMMONIA RELATED WORK

Pre-job planning or a site assessment will be conducted prior to starting work and that the assessment will be documented. Documented planning will be conducted for those operations involving potential ammonia exposure and this includes anytime an active purge is being applied to a system in or around equipment associated with work. Some planning or assessment elements include:

- All proposed work requires a jobsite visit by the requestor and a unit operator to identify special precautions, equipment status and personal safety equipment requirements.
- The permit must clearly identify all hazards and special personal protective equipment requirements.
 - Appropriate signage will be utilized and adhered to. Appropriate signage will include adequate warning as seen below.



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PERSONAL PROTECTIVE EQUIPMENT

Company employees will use impervious clothing, gloves and/or face shields if there is a possibility of skin contact with liquid ammonia or vessels containing liquid Anhydrous Ammonia. Employees will be provided with and required to use impervious clothing, gloves, face shields and other appropriate protective clothing necessary to prevent any possibility of skin contact with liquid Anhydrous Ammonia or aqueous solutions of ammonia containing more than 10% by weight of ammonia. Similar precautions should be taken to prevent the skin from becoming frozen from contact with vessels containing liquid Anhydrous Ammonia.

Training

Employees will be aware of provisions of site-specific contingency/emergency plans. Employees will be aware of owners' contingency plans and provisions. Employees must be informed where ammonia is used in the host facility and aware of additional plant safety rules.

The Company shall provide training for all affected employees including any Company employee working with or near ammonia and the training shall emphasize:

- The characteristics of ammonia.
- The hazards of ammonia.
- Proper PPE.
- Owner client requirements.

Documentation of training - Ammonia awareness training shall be documented including dates of training, location of training, employee name and trainer name.

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Purpose

The purpose of this procedure is to advise employees in areas where arsenic is being used and to supply an awareness level basis about the properties and hazards of Arsenic, general guidelines and training requirements.

Scope

This procedure applies to Company operations where employees whose work activities may involve working with or around Anhydrous Arsenic. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Applicable regulations:

29 CFR 1910.1018, Inorganic arsenic

29 CFR 1910.1018, App A Inorganic arsenic substance information sheet 29 CFR 1910.1018, App B Substance technical guidelines

29 CFR 1910.1018, App C Medical Surveillance guidelines

29 CFR 1010.1018 This program applies to all occupational exposures to inorganic arsenic except that this section does **not apply** to employee exposures in agriculture or resulting from pesticide application, the treatment of wood with preservatives or the utilization of arsenic to preserved wood.

Responsibilities

MANAGERS AND SUPERVISORS

- In coordination with the EH&S Manager, develop and implement arsenic awareness training.
- Ensure personnel are aware of work that has the potential of exposure to arsenic.
- Identify possible locations where arsenic in the workplace may be used.
- Inform the EH&S Manager of upcoming work involving arsenic, allowing the EH&S Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the arsenic awareness requirements.

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EHS MANAGER:

- Coordinate annual arsenic awareness training activities.

EMPLOYEES:

- Comply with the arsenic awareness requirements and direct any questions or concerns to the EH&S Manager.
- Attend required training.

Exposure

Exposures to Inorganic Arsenic may occur:

- during the manufacture of insecticides, weed killers and fungicides.
- during use in the manufacture and handling of calcium arsenate.
- during use in the manufacture of electrical semiconductors, diodes, and solar batteries.
- during use as an addition to alloys to increase hardening and heat resistance.
- during smelting of ores

The health hazard to inorganic arsenic is high. Exposure to airborne concentrations of inorganic arsenic may cause lung cancer and can be a skin irritant. Inorganic arsenic may also affect your body if swallowed. One compound, arsenic trichloride, is especially dangerous because it can be absorbed readily through the skin. Because inorganic arsenic is a poison, you should wash your hands thoroughly prior to eating or smoking.

Inorganic arsenic definition includes Copper acetoorcein, arsenic and all inorganic compounds containing arsenic except arsine, measured as arsenic (As).

The Permissible Exposure Limit [PEL] is Employee is exposure to inorganic arsenic at concentrations greater than **10 ug/m³** of air averaged over any 8-hour period.

Action Level: a concentration of inorganic arsenic of **5 ug/m³** of air averaged over any eight (8) hour period.

No employee may be exposed to **any skin or eye contact** with arsenic trichloride or to skin or eye contact likely to cause skin or eye irritation.

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Note: Even though the airborne PEL for arsenic trichloride is 0.01 mg/m³, when skin contact occurs, overexposure may occur.

Procedures

The following steps will be taken in the order presented: The steps to be followed in this program are:

1. Identify types of work where inorganic arsenic exposure may occur, see above.
2. Establish, through exposure monitoring, that exposures, without respiratory protection, are at or above the action level for inorganic arsenic which is 5 ug/m³ of air averaged over any eight (8) hour period.

Note: At the above exposure level, a written compliance program will be established and implemented to reduce employee exposure to inorganic arsenic to or below the PEL by means of engineering and work practice controls.

3. Establish regulated areas where the possibility of exposure to inorganic arsenic above the PEL, 10 ug/m³ of air averaged over an 8-hour time period, is eliminated first through administrative and engineering controls and, if necessary, through the use of PPE.
4. Ensure no employee may work in the regulated areas until they have received documented training related to inorganic arsenic exposures, have partaken in a medical surveillance program, and demonstrated they are aware of the engineering controls, the work practice procedures, the plan for emergency situations, and proper use of PPE items.
5. Establish a respiratory protection program addressing specific inorganic arsenic exposures.
6. Review written procedures annually or more often and update them if significant changes occur.

Exposure Monitoring:

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Determinations of airborne exposure levels shall be made from air samples that are representative of each employee's exposure to inorganic arsenic over an eight (8) hour period.

NOTE: EMPLOYEE EXPOSURE IS THAT EXPOSURE WHICH WOULD OCCUR IF THE EMPLOYEE WERE NOT USING A RESPIRATOR.

Full shift (for at least 7 continuous hours) personal samples including at least one sample for each shift for each job classification in each work area will be collected.

Initial Monitoring:

Each workplace or work operation where potential exposure to inorganic arsenic exists will be monitored to accurately determine the airborne concentration of inorganic arsenic to which employees may be exposed.

Frequency:

1. If the initial monitoring reveals employee exposure to be below the action level [5 ug/m³ of air averaged over any eight (8) hour period] the measurements need not be repeated unless there has been a production, process, control, or personal change which may result in new or additional exposure to inorganic arsenic, or whenever there is reason to suspect a change which may result in new or additional exposures to inorganic arsenic.
2. If the initial monitoring, required by this section, or subsequent monitoring reveals employee exposure to be above the permissible exposure limit [inorganic arsenic at concentrations greater than 10 ug/m³ of air averaged over any 8-hour period], monitoring shall be repeated at least quarterly.
3. If the initial monitoring or subsequent monitoring reveals employee exposure to be above the action level and below the permissible exposure limit the employer shall repeat monitoring at least every six months.
4. Continue monitoring at the required frequency will proceed until at least two consecutive measurements, taken at least seven (7) days apart, are below the action level.

If a production, process, control, or personal change which may result in new or additional exposure to inorganic arsenic, then monitoring will continue as above.

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Notification of Monitoring:

Affected employees will be notified within 15 working days after the receipt of the results of any monitoring b either individually in writing or by posting the results in an appropriate accessible location.

Compliance Program:

A written compliance program shall be implemented when the PEL of 10 ug/m (3) is exceeded to reduce exposures to or below the permissible exposure limit by means of engineering and work practice controls.

Written plans for these compliance programs shall include at least the following:

- A description of each operation in which inorganic arsenic is emitted.
- e.g., machinery used, material processed, controls in place, crew size, operating procedures, and maintenance practices.
- Engineering plans and studies used to determine methods selected for controlling exposure to inorganic arsenic.
- A report of the technology considered in meeting the permissible exposure limit.
- Monitoring data.
- A detailed schedule for implementation of the engineering controls and work practices that cannot be implemented immediately and for the adaption and implementation of any additional engineering and work practices necessary to meet the permissible exposure limit.
- Whenever the employer will not achieve the permissible exposure limit with engineering controls and work practices by December 31, 1979, the employer shall include in the compliance plan an analysis of the effectiveness of the various controls, shall install engineering controls and institute work practices on the quickest schedule feasible, and shall include in the compliance plan and implement a program to minimize the discomfort and maximize the effectiveness of respirator use; and
- Other relevant information.

Written plans for such a program shall be submitted upon request to the Assistant Secretary and the Director and shall be available at the worksite for examination and copying by the Assistant Secretary, Director, any affected employee or authorized employee representatives.

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THE WRITTEN PLAN MUST BE REVIEWED AND UPDATED AT LEAST ANNUALLY [MORE OFTEN, IF NECESSARY] TO REFLECT THE STATUS OF THE PROGRAM.

Regulated Area:

Regulated areas shall be established where worker exposures to inorganic arsenic, without regard to the use of respirators, are more than the permissible limit.

Regulated areas shall be demarcated and segregated from the rest of the workplace in any manner that minimizes the number of persons who will be exposed to inorganic arsenic.

Access to regulated areas shall be limited to authorized persons or to persons otherwise authorized by the Act or regulations issued pursuant thereto to enter such areas.

All persons entering a regulated area shall be supplied with a respirator, selected in accordance with the provisions of our Respiratory Protection Program, specifically 29CFR 1910.134(b) through (d) (except (d)(1)(iii)), and (f) through (m).

NOTE: IF AN EMPLOYEE EXHIBIT BREATHING DIFFICULTY DURING FIT TESTING OR RESPIRATOR USE, THEY MUST BE EXAMINED BY A PHYSICIAN TRAINED IN PULMONARY MEDICINE TO DETERMINE WHETHER THEY CAN USE A RESPIRATOR WHILE PERFORMING THE REQUIRED DUTY.

Prohibited Activities in Regulated Areas:

Food or beverages are not to be consumed, smoking products, chewing tobacco and gum are not to be used and cosmetics are not to be applied.

NOTE: THE ABOVE MAY BE CONDUCTED IN THE LUNCHROOMS, CHANGE ROOMS AND SHOWERS.

Note: Drinking water may be consumed in the regulated area.

Protective Work Clothing and Equipment

Where the possibility of skin or eye irritation from inorganic arsenic exists, and for all workers working in regulated areas, appropriate and clean protective work clothing and equipment shall be provided at no cost to the employee. This clothing and equipment would include, but not be limited to:

- Coveralls or similar full-body work clothing.
- Gloves, and shoes or coverlets.
- Face shields or vented goggles when necessary to prevent eye irritation, which comply with the requirements of 1910.133(a)(2)-(6); and

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- Impervious clothing for employees subject to exposure to arsenic

trichloride. Cleaning and Replacement:

The above protective clothing will be provided a freshly laundered and dry condition at least weekly, and daily if the employee works in areas where exposures are over 100 ug/m (3) of inorganic arsenic or in areas where more frequent washing is needed to prevent skin irritation.

The above protective clothing will be cleaned, laundered, or disposed of at no cost to the employee.

The protective clothing and equipment will be repaired or replaced as needed to maintain their effectiveness.

All protective clothing must be removed at the completion of a work shift only in change-rooms.

Contaminated protective clothing which is to be cleaned, laundered, or disposed of, will be placed in a closed container in the change-room which prevents dispersion of inorganic arsenic outside the container.

Any person who cleans or launders clothing, above, will be notified in writing of the potentially harmful effects including the carcinogenic effects of exposure to inorganic arsenic.

Labels on Contaminated Protective Clothing and Equipment:

Containers of contaminated protective clothing and equipment in the workplace or which are to be removed from the workplace must be labeled and the labels shall include the following information:

DANGER: CONTAMINATED WITH INORGANIC ARSENIC. MAY CAUSE CANCER. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF INORGANIC ARSENIC CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE OR FEDERAL REGULATIONS.

Note: The removal of inorganic arsenic from protective clothing or equipment by blowing or shaking.

Housekeeping:

- All surfaces shall be maintained as free as practicable of accumulations of inorganic arsenic.
- Floors and other accessible surfaces contaminated with inorganic arsenic may not be cleaned by the use of compressed air and shoveling and brushing may be used only where vacuuming or other relevant methods have been tried and found not to be effective.
- Where vacuuming methods are selected, the vacuums shall be used and emptied in a manner to minimize the reentry of inorganic arsenic into the workplace.
- A written housekeeping and maintenance plan shall be kept which shall list appropriate frequencies for carrying out housekeeping operations, and for cleaning and maintaining dust collection equipment. The plan shall be available for inspection by the Assistant Secretary.
- Periodic cleaning of dust collection and ventilation equipment and checks of their effectiveness shall be carried out to maintain the effectiveness of the system and a notation kept of the last check of effectiveness and cleaning or maintenance.

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Medical Surveillance:

The employer shall institute A medical surveillance program will be instituted for the following employees:

- All employees who are or will be exposed above the action level, without regard to the use of respirators, at least 30 days per year; and
- All employees who have been exposed above the action level, without regard to respirator use, for 30 days or more per year for a total of 10 years or more of combined employment with the employer or predecessor employers.
- All medical examinations and procedures will be performed by or under the supervision of a licensed physician, and shall be provided without cost to the employee, without loss of pay and at a reasonable time and place.

The initial medical examination will include at least the following elements:

a. A work history and a medical history which shall include a smoking history and the presence and degree of respiratory symptoms such as breathlessness, cough, sputum production and wheezing.

A medical examination which shall include at least the following:

- A standard posterior-anterior chest x-ray.
- A nasal and skin examination; and
- Other examinations which the physician believes appropriate because of the employees' exposure to inorganic arsenic or because of required respirator use.

Periodic examinations:

- Examinations must be provided at least annually.
- Whenever a covered employee has not taken the examinations specified above within six (6) months preceding the termination of employment, he/she shall be provided such examinations upon termination of employment.

Additional Examinations:

If the employee for any reason develops signs or symptoms commonly associated with exposure to inorganic arsenic the employer shall provide an appropriate examination and emergency medical treatment.

The following information shall be provided to the examining physician:

- A copy of this standard and its appendices.
- A description of the affected employee's duties as they relate to the employee's exposure.
- The employee's representative exposure level or anticipated exposure level.
- A description of any personal protective equipment used or to be used; and
- Information from previous medical examinations of the affected employee which is not readily

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available to the examining physician.

Physician's Written Opinion:

A written opinion from the examining physician provided to our Safety Program Administrator must include:

- The results of the medical examination and tests performed.
- The physician's opinion as to whether the employee has any detected medical conditions which would place the employee at increased risk of material impairment of the employee's health from exposure to inorganic arsenic.
- Any recommended limitations upon the employee's exposure to inorganic arsenic or upon the use of protective clothing or equipment such as respirators; and
- A statement that the employee has been informed by the physician of the results of the medical examination and any medical conditions which require further explanation or treatment.

The physician may not to reveal in the written opinion specific findings or diagnoses unrelated to occupational exposure.

A copy of the written opinion shall be provided to the affected employee.

AN ACCURATE RECORD FOR EACH EMPLOYEE SUBJECT TO MEDICAL SURVEILLANCE MUST BE ESTABLISHED AND MAINTAINED.

a. This record will include:

- the name, social security number, and description of the duties of the employee.
- a copy of the physician's written opinions and an explanation sheet for biological monitoring results.
- a copy of the medical history, and the results of any physical examination and all test results that are required to be provided by this section, including biological tests, X-rays, pulmonary function tests, etc., or that have been obtained to further evaluate any condition that might be related to inorganic arsenic exposure.
- results of any airborne exposure monitoring done on or for that employee and provided to the physician; and
- any employee medical complaints related to exposure to

inorganic arsenic. A copy of the information provided to the physician as

required by 29 CFR 1910.1018 Recordkeeping

This program [our written procedures] as well as all records required to be maintained by 29 CFR 1910.1027(n), Recordkeeping, will be made available, upon request, to affected employees, former employees, and their designated representatives, and to the Assistant Secretary and the Director for examination and copying.

Availability of Records

Upon request, the Safety Program Administrator will make any exposure records required by 29 CFR 1910.1018,

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Inorganic arsenic, available for examination and copying to affected employees, former employees, designated representatives, and the Assistant Secretary, in accordance with 29 CFR 1910.1020(a) through (e) and (g) through (i).

Upon request, the Safety Program Administrator, will make employee medical records required by 29 CFR 1910.1018, Inorganic arsenic, available for examination and copying to the subject employee, anyone having the specific written consent of the subject employee, and the Assistant Secretary, in accordance with 29 CFR 1910.1020.

Transfer of Medical Records

Should we cease to do business, the successor employer shall receive and retain all the above medical records. Should we cease to do business and there is no successor employer to receive and retain the above medical records, they shall be transmitted to the Director.

At the expiration of the retention period for the above medical records, the Safety Program Administrator will notify the Director at least 3 months prior to the disposal of such records and shall transmit those records to the Director if he requests them within that period.

Hygiene Facilities and Practices

For employees working in regulated areas or subject to the possibility of skin or eye irritation from inorganic arsenic, clean change rooms equipped with storage facilities for street clothes and separate storage facilities for protective clothing and equipment in shall be provided per 29 CFR 1910.141(e).

Showers

The employer shall assure that employees working in regulated areas or subject to the possibility of skin or eye irritation from inorganic arsenic shower at the end of the work shift.

Shower facilities will be provided in accordance with 1910.141(d)(3)(i) through (d)(3)(v).

Lunchrooms

For employees working in regulated areas, lunchroom facilities which have a temperature controlled, **positive pressure, filtered air supply**, and which are readily accessible to employees working in regulated areas will be provided.

Employees working in the regulated area or subject to the possibility of skin or eye irritation from exposure to inorganic arsenic **must** wash their hands and face prior to eating.

Lavatory facilities which comply with 1910.141(d)(1) & (2) will be provided.

Facilities for employees working in areas where exposure, without regard to the use of respirators, exceeds 100 ug/m(3) will be provided to vacuum their protective clothing and clean or change shoes worn in such areas before entering change rooms, lunchrooms or shower rooms.

Employees **may not allow exposure** to skin or eye contact with arsenic trichloride, or to skin or eye contact with liquid or particulate inorganic arsenic which is likely to cause skin or eye irritation.

Respiratory Protection

Where engineering and work practice controls are not sufficient to reduce exposures to or below the permissible

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exposure limit, they shall nonetheless be used to reduce exposures to the lowest levels achievable by these controls and shall be supplemented using respirators.

Respirators must be used during:

- Periods necessary to install or implement feasible engineering or work-practice controls.
- Work operations, such as maintenance and repair activities, for which the employer establishes that engineering and work-practice controls are not feasible.
- Work operations for which engineering, and work-practice controls are not yet sufficient to reduce employee exposures to or below the permissible exposure limit.
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Employees will fall under the provisions of our respiratory protection program in accordance with § 1910.134(b) through (d) (except (d)(1)(iii)), and (f) through (m).

If an employee exhibit breathing difficulty during fit testing or respirator use, they must be examined by a physician trained in pulmonary medicine to determine whether they can use a respirator while performing the required duty.

Respirator Selection Special Requirements

Employees **may not use half mask respirators** for protection against arsenic trichloride because it is absorbed rapidly through the skin.

HEPA filters for powered and non-powered air-purifying respirators will be provided.

Appropriate Respirators for Employee Use:

- Air-purifying respirators that have a combination HEPA filter with an appropriate gas-sorbent cartridge or canister when the employee's exposure exceeds the permissible exposure level for inorganic arsenic and the relevant limit for other gases.
- Front-or back-mounted gas masks equipped with HEPA filters and acid gas canisters or any full facepiece supplied-air respirators when the inorganic arsenic concentration is at or below 500 mg/m³; and half mask air-purifying respirators equipped with HEPA filters and acid gas cartridges when the inorganic arsenic concentration is at or below 100 µg/m³.
- Employees required to use respirators may choose, and the employer must provide, a powered air-purifying respirator if it will provide proper protection. In addition, the employer must provide a

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combination dust and acid-gas respirator to employees who are exposed to gases over the relevant exposure limits.

Training

A training program will be instituted per 1910.1018(o)(1)(i).

Each employee who is subject to exposure to inorganic arsenic above the action level without regard to respirator use, or for whom there is the possibility of skin or eye irritation from inorganic arsenic, will be trained and employee participation will be ensured.

The training program for which 1910.1018 applies will be provided will be provided at the time of initial assignment and at least annually for other covered employees thereafter; and the employer shall assure that each employee is informed of the following:

1. The information contained in [29 CFR 1910.1018, App A Inorganic arsenic substance information sheet](#);
2. The quantity, location, manner of use, storage, sources of exposure, and the specific nature of operations which could result in exposure to inorganic arsenic as well as any necessary protective steps.
3. The purpose, proper use, and limitation of respirators.
4. The purpose and a description of the medical surveillance program as required by paragraph (n) of this section.
5. The engineering controls and work practices associated with the employee's job assignment; and
6. A review of 29 CFR 1910.1018.
7. Access to training materials. Specifically, 29 CFR 1910.1018 and its appendices will be made readily available to affected employees.

The employer shall make readily available to all affected employees a copy of this standard and its appendices.

Upon request, all materials relating to the employee information and training program will be provided to the Assistant Secretary and the Director.

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Purpose

This procedure is to provide basic precautions and protections for employees to avoid exposure to asbestos containing material (ACM) or presumed asbestos containing material (PACM) during removal and/or abatement work.

Key Responsibilities

MANAGERS/SUPERVISORS

- Ensure owners or operators are notified of PACM.
- Prohibit Company employees from working until material in question is confirmed as non-asbestos or abated.
- Ensure proper employee training is completed.
- Ensure that all requirements of this program are understood and followed by those working under his/her direction.

ALL EMPLOYEES

All employees are required to act in strict compliance with the requirements of this program and delay or discontinue work if there is ever an unresolved concern regarding exposure to asbestos.

CLIENTS

Clients are required to notify the Company of the existence of any asbestos contained within the work scope area.

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GENERAL

All asbestos abatement work, other than a limited scope of Class II work, shall be awarded to qualified asbestos abatement contractors. Client owned and/or operated equipment and facilities, where surfacing material or insulation is present, must be confirmed non-asbestos before Company employees disturb that material. Where surfacing material or insulation cannot be confirmed non-asbestos, the client or owner must test, and where necessary abate, the material before Company employees are permitted to work.

SIGNAGE

Signage will be used to identify regulated areas. Warning signs shall be provided and displayed at each regulated area. In addition, warning signs shall be posted at all approaches to regulated areas so that an employee may read the signs and take necessary protective steps before entering the area.

Asbestos Assessment

Potential exposure to asbestos is assessed to ensure exposure does not exceed occupational exposure limits

Assessments include visually for the existence of asbestos as well as from breathing zone air samples that are representative of the 8-hour TWA and 30-minute short-term exposures of each employee.

COMPANY shall ensure no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter of air as an eight (8)-hour time-weighted average (TWA). COMPANY shall ensure no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of thirty (30) minutes.

An independent/third party air sampling person shall perform all required air sampling during contractor asbestos work and provide the results to the Company

Affected employees and/or their designated representatives are to be provided the opportunity to observe asbestos exposure monitoring.

Air sampling analysis shall be performed by an American Industrial Hygiene Association (AIHA) accredited laboratory.

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The number of samples necessary to be considered "representative" is dependent upon many factors and must be determined in consultation with the Company, Certified Industrial Hygienist consultant, or a third-party air sampling professional.

Affected employees shall be notified of monitoring results, which represent the employee's exposure, as soon as possible following receipt of the monitoring results.

Employees shall be notified in writing either individually or by posting at a centrally located place that is accessible to affected employees.

Once representative sampling indicates that exposure levels for that activity are consistently below the OSHA established permissible limit and/or excursion limit, the requirement for respiratory protection may be waived.

It is imperative that accurate personnel air sampling records are maintained to justify any relaxation of respiratory protection requirements.

Results of air sampling data must be maintained in the asbestos job documentation.

Engineering Controls and Work Practices

The Company shall use engineering controls and work practices to reduce exposure below the permissible exposure limit.

Engineering controls and work practices shall be used to reduce and maintain employee exposure to or below the TWA and/or excursion limit, except to the extent that such controls are not feasible. Wherever the feasible engineering controls and work practices are not sufficient to reduce employee exposure to or below the TWA and/or excursion limit, Company shall use them to reduce employee exposure to the lowest levels achievable by these controls and shall supplement them by the use of respiratory protective equipment.

Asbestos exposure controls are designed to eliminate or minimize an employee's exposure to airborne asbestos fibers using work practices and engineering controls. Where the TWA and/or excursion limit is exceeded, a written

Asbestos Exposure Control Program to reduce employee exposure shall be established and implemented to reduce employee exposure to or below the TWA and to or below the excursion limit.

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Prior to initiating any asbestos work the Competent Person must perform an asbestos exposure assessment. After the exposure assessment, the engineering controls and work practices to be employed shall be identified.

Prior to commencement of work, the affected employees shall be briefed on the engineering controls and work practices designed to reduce/maintain the exposure below TWA for the asbestos work. This briefing shall be documented and maintained with the job documentation. This shall be done except to the extent that such controls are not feasible. Some of them may be exhaust systems for hand tools, wet methods, clean-up procedures and PPE shall be used.

Wet methods will be employed for all asbestos work to minimize potential airborne exposure wherever possible. ACM shall be wetted from the initiation of the maintenance or renovation operation and wetting agents shall be used continually throughout the work period to ensure that any dry ACM exposed in the course of the work is wet and remains wet until final disposal.

Wetting agents, usually a surfactant (dish soap), are generally prepared by mixing 1 to 3 ounces of wetting agent to 5 gallons of water.

Restricted/Regulated Areas

The Company shall create restricted/regulated areas where asbestos abatement activities are in progress. Regulated areas shall be established wherever airborne concentrations of asbestos and/or PACM are in excess of the TWA and/or excursion limit. Regulated areas shall be demarcated from the rest of the workplace in any manner that minimizes the number of persons who will be exposed to asbestos. Access to regulated areas shall be limited to authorized persons.

Regulated asbestos areas shall be established with barriers, tape, OSHA approved warning signs and other physical controls when airborne concentrations of asbestos are present.

Medical Surveillance Program

All Company employees who for a combined total of 30 or more days per year are engaged in Class II asbestos work or who are exposed at or above the permissible exposure limit for a combined 30 days or more per year shall be included in the Company medical surveillance program.

Note: For purposes of this requirement, any day in which an employee is engaged in Class II or Class III work or a combination

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thereof for one hour or less and, while doing so, adheres fully to the work practices specified in this standard, shall not be counted. The medical surveillance program shall be made available according to the following schedules:

- Prior to assignment of an employee to an asbestos area where negative pressure respirators are worn.
- Where exposure to asbestos may be at or above the permissible exposure level for 30 or more days per year, or where employees are engaged in Class II asbestos work for 30 or more days per year, at least annually thereafter, if exposures exist.
- Asbestos medical examination must be given within ten (10) working days following the thirtieth day of exposure.
- If an examining physician determines that any of the examinations should be provided more frequently than specified, they shall be provided at the periodicity specified by the physician.

No asbestos medical examination is required when complete records of such examination, performed less than twelve months prior to commencement of asbestos work are available.

As part of the medical surveillance, the attending physician shall provide a written opinion of the results of the medical examination to the Company and the Contract Medical Surveillance Provider, who in turn will provide a copy to the affected employee within 30 days. In accordance with OSHA regulations, once employees are no longer exposed to asbestos their inclusion in the medical surveillance program is no longer required.

Respiratory Protection and Personal Protective Equipment

Respirators are provided to employees. Respirators must be used during:

Periods necessary to install or implement feasible engineering and work-practice controls.

- Work operations, such as maintenance and repair activities, for which engineering and work-practice controls are not feasible.
- Work operations for which feasible engineering and work-practice controls are not yet sufficient to reduce employee exposure to or below the TWA and/or excursion limit.
- Emergencies.

Personal Protective Equipment (PPE) shall be used while working with asbestos. If an employee is exposed to asbestos above the TWA and/or excursion limit, or where the possibility of eye irritation exists, COMPANY shall provide at no cost to the employee and ensure that the employee uses appropriate protective work clothing and equipment such as, but not limited to:

- Coveralls or similar full-body work clothing.
- Gloves, head coverings, and foot coverings, and
- Face shields, vented goggles, or other appropriate protective equipment.

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The respirator shall be chosen in accordance with the Company Respiratory Protection Program and shall be approved by NIOSH. Powered, air-purifying respirators shall be available when the employees choose to use this type or the hazard assessment process requires this type, or when the respirator will provide more adequate protection. Prerequisites for use of respiratory equipment, regarding asbestos, include:

- Successfully passing a respiratory physical.
- Successfully completing annual respiratory protection training.
- Successfully passing a respirator fit test.

Waste Disposal

Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing shall be collected and disposed of in sealed, labeled impermeable bags of greater than 6 mils thickness or other closed, labeled, impermeable containers.

Bags or containers shall be imprinted and clearly labeled with the following OSHA asbestos hazard warning and address:

DANGER
CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD

COMPANY NAME

Site Address
Contractor's
Name Contractor's
Address

Bags/containers shall be clearly labeled. An Asbestos Waste Shipment Record shall be utilized. Check with the landfill prior to shipping to see if they require their own shipping record or use a Waste Manifest.

Asbestos shall be transported to an approved landfill that accepts asbestos. A licensed waste hauler may be used to transport the packaged ACM. Transport vehicles shall either be enclosed or covered. Do not use vehicles with compactors to transport ACM. A shipping form shall accompany the ACM, during transport, to the landfill.

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Record Keeping

All records relating to any asbestos activity shall be maintained by the Company permanently. The following records shall be maintained:

- Exposure Assessments that are being relied upon to support a location's position that asbestos work (specific or generic) will not result in exposures above the PEL or excursion limit.
- Employee asbestos exposure records (personnel air monitoring).
- Medical Surveillance records.
- Training records.
- Shipping papers and disposal records.
- Copies of notification letters sent to Governmental agencies.
- Pre-project asbestos sampling results.
- Post-project clearance sampling results.
- Daily Work Summaries.
- Project Completion Closure Report, if provided.

Training

Employees are provided training on Asbestos. Employees who are exposed to airborne concentrations of asbestos at or above the PEL and/or excursion limit must be trained. The Company shall institute a training program and ensure employee participation in the program. Training shall be provided prior to or at the time of initial assignment and at least annually thereafter. A copy of the standard should be made readily available to all affected employees.

Training shall be documented and maintained in the employee training file.

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Purpose

The purpose of this program is to provide awareness of the hazards of working in areas where employees may potentially be exposed to asbestos.

Scope

This program applies to all Company employees who may perform work in regulated areas be covered by the program. Employees who perform housekeeping activities during and after construction activities shall be covered by the asbestos construction standard.

Key Responsibilities

MANAGERS/SUPERVISORS

- Ensure owners or operators are notified of PACM.
- Prohibit Company employees from working until material in question is confirmed as non-asbestos or abated.
- Ensure proper employee training is completed.
- Ensure that all requirements of this program are understood and followed by those working under his/her direction.
- Perform duties of the Competent Person for asbestos work.

ALL EMPLOYEES

All employees are required to act in strict compliance with the requirements of this program and delay or discontinue work if there is ever an unresolved concern regarding exposure to asbestos.

Procedure

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LOCATIONS FOR POTENTIAL EXPOSURE TO ASBESTOS

Locations in which employees may potentially be exposed to asbestos and those locations be identified and included in the asbestos awareness training provided to affected workers. Examples of where asbestos maybe found include manufacturing of heat resistant clothing, automotive brake and clutch linings, certain building materials such as insulation, sound proofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet, fire resistant drywall, pipe and boiler insulating materials, pipeline wrap, and in sprayed on materials located on beams, in crawlspaces, and between walls. Each work site specific safety program shall address any identified potential exposure to asbestos locations.

HAZARD ASSESSMENT

The Company shall cause an assessment to be made in writing of the exposure or likelihood of exposure of a worker to the inhalation or ingestion of asbestos. In causing the assessment to be made, the Company shall consider and take into account such matters as the methods and procedures used or to be used in the processing, mining, use, handling, or storage of asbestos; the extent and potential extent of the exposure of a worker to the inhalation or ingestion of asbestos; and the measures and procedures necessary to control such exposure by means of engineering controls, work practices and hygiene practices, and facilities.

Potential exposure to asbestos is assessed by the Company to ensure exposure does not exceed occupational exposure limits. The potential for worker exposure to asbestos will be identified during the hazard assessment.

HEALTH EFFECTS

The Company will ensure that workers who are likely to be employed in an asbestos process or are likely to be exposed to asbestos dust are warned that the inhalation of asbestos may cause pneumoconiosis, lung cancer or mesothelioma and the risk of injury to health cause by the inhalation of asbestos is increased by smoking.

GENERAL

The Company shall in consultation with the committee, develop an asbestos control plan that protects the health and safety of all workers in the event of the dispersal of asbestos dust into the atmosphere at a place of employment or worksite. A plan developed must be in writing and include emergency procedures to be used in case of an uncontrolled release of asbestos including the means to protect exposed workers, the methods to confine and control the release of asbestos and the decontamination procedures to be used, the asbestos processes that workers may undertake, the training of workers in any asbestos process the workers may be required or permitted to undertake, the methods to control the release of asbestos dust, the PPE workers may be required to use, decontamination procedure and the inspection and maintenance schedule for all asbestos- containing materials.

Client owned and/or operated equipment and facilities, where surfacing material or insulation is present, must be confirmed non-asbestos before Company employees disturbs that material. Where surfacing material or insulation cannot be confirmed non-asbestos, the client or owner must test, and where necessary abate, the material before Company employees are permitted to work.

The Company must post signs at the boundaries of the restricted/designated work area indicating asbestos work is in progress, the hazards, and the precautions required for entering the work area and employees will abide warning signs and labels

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and will not disturb the Asbestos Containing Material.

Asbestos Exposure Control Program and Procedures

This section provides for engineering controls and work practices to reduce/maintain the exposure below TWA. These practices should be done except to the extent that such controls are not feasible. Some of the work practices may be exhaust systems for hand tools, wet methods, clean-up procedures and PPE.

Where workers have access to asbestos-containing materials the Company shall ensure that the asbestos containing materials are clearly and conspicuously labeled with a placard as asbestos. A map or plan that is readily available to the workers must be available showing location of any asbestos-containing material.

If the TWA and/or excursion limit is exceeded, a written asbestos exposure control program to reduce employee exposure is implemented. To reduce levels, this can be done by means of engineering and work practice controls and the use of respiratory protection.

To ensure adequate coordination of the overall plan, the Company must ensure that it is administered by a properly trained person.

The qualified person must be an occupational health and safety professional with experience in the practice of occupational hygiene as it relates to asbestos management.

The asbestos procedures must address containment of asbestos operations where applicable, control of the release of asbestos fiber, provision, use and maintenance of appropriate personal protective equipment and clothing, means for the decontamination of workers, and removal of asbestos waste and clean-up of asbestos waste material. The procedures must provide a worker with task-specific work direction that addresses both hazards and necessary controls.

Asbestos exposure controls are designed to eliminate or minimize an employee's exposure to airborne asbestos fibers through the use of work practices and engineering controls. If the TWA and/or excursion limit is exceeded, a site specific written Asbestos Exposure Control Program to reduce employee exposure shall be implemented containing means of engineering & work practice controls & the use of respiratory protection.

Prior to initiating any asbestos work the Competent Person must perform an asbestos exposure assessment. Subsequent to the exposure assessment, the engineering controls and work practices to be employed shall be identified.

Prior to commencement of work, the affected employees shall be briefed on the engineering controls and work practices designed to reduce/maintain the exposure below TWA for the asbestos work. This briefing shall be documented and maintained with the job documentation. Where engineering controls are not feasible work practices such as exhaust systems for hand tools, wet methods, clean-up procedures & PPE shall be used.

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Wet methods will be employed for all asbestos work as a means to minimize potential airborne exposure wherever possible. ACM shall be wetted from the initiation of the maintenance or renovation operation and wetting agents shall be used continually throughout the work period to ensure that any dry ACM exposed in the course of the work is wet and remains wet until final disposal. Wetting agents, usually a surfactant (dish soap), are generally prepared by mixing 1 to 3 ounces of wetting agent to 5 gallons of water.

Where exhaust ventilation equipment used to contain asbestos dust the Company shall ensure that the equipment is equipped with a HEPA filter, inspected regularly for defects, maintained and certified by a competent person at least once each year as being able to function safely and effectively.

Control measures to prevent worker exposure to asbestos and procedures to be followed in the event of an uncontrolled release of asbestos it will be preloaded on a site specific basis. The program must include site specific measures to be used to prevent the uncontrolled release of asbestos and the procedures to be followed if there is an uncontrolled release.

Restricted & Designated Areas

Where an asbestos process is undertaken, the Company shall ensure that the area is effectively isolated or otherwise enclosed to prevent the escape of asbestos dust to any other part of the place of employment and that a warning notice is conspicuously displayed indicating that asbestos work is in progress.

Workers involved in asbestos abatement must complete an asbestos certification course. The Company must ensure that a worker who enters a restricted area that is designated as a restricted area due to the presence of asbestos has successfully completed a course of instruction approved by a Director of Occupational Hygiene, and has in the worker's possession the original valid certificate of completion of the course issued to the worker.

All employees who perform work in regulated areas will be covered by this procedure. Employees who perform housekeeping activities during and after construction activities are also covered by this procedure.

Personnel Air Monitoring & Established Regulated Airborne Concentrations of Asbestos

The Company shall require monitoring to ensure that no employee is exposed to an airborne concentration of asbestos excess of 1.0 fiber per cubic centimeter of air (1 f/cc) in 30 minute.

The air quality (safety) is to be determined from breathing zone air samples. The samples should be representative of the 8-hour TWA and 30 minute short term exposure. Measurements are required for documentation.

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Access is limited to regulated areas.

Affected employees and/or their designated representatives are to be provided the opportunity to observe asbestos exposure monitoring.

Where the asbestos exposure assessment (in the absence of quantitative personnel monitoring results) does not present objective, convincing data that indicates the ACM to be handled will not (under the worst circumstances) release airborne fibers, personnel air monitoring shall be performed to quantify exposure.

If personnel monitoring is considered necessary during the asbestos exposure assessment, in an effort to verify exposures would be maintained below the PEL/excursion limit, respiratory protection shall be utilized until such time that sufficient sampling results verify that respiratory protection is not required.

The Company EHS Manager is to be consulted for advice and assistance in performing personnel air sampling activities.

The number of samples necessary to be considered "representative" is dependent upon many factors and must be determined in consultation with the Company EHS Manager, Certified Industrial Hygienist consultant, or a third party air sampling professional.

Affected employees will be notified of monitoring results, which represent the employee's exposure, as soon as possible following receipt of the monitoring results.

Employees shall be notified in writing either individually or by posting at a centrally located place that is accessible to affected employees.

Once representative sampling indicates that exposure levels for that particular activity are consistently below the established permissible limit and/or excursion limit, the requirement for respiratory protection may be waived.

It is imperative that accurate personnel air sampling records are maintained in order to justify any relaxation of respiratory protection requirements.

Results of air sampling data must be maintained in the asbestos job documentation.

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Medical Surveillance Program

Workers exposed to asbestos are provided health assessments. The person with custody of the health assessment record must ensure that no person, other than the worker or health professional who conducts the health assessment, has access to the exposed worker's health assessment unless the record is in a form that does not identify the worker, or the worker gives written permission for access by another person.

The Company must ensure that a worker undergoes a health assessment not more than 30 calendar days after the worker becomes an exposed worker, and every two years after the first health assessment. Exposed workers may refuse to undergo part or all of a health assessment by giving COMPANY a written statement refusing it. COMPANY must pay the cost of the health assessment and ensure that, if it is reasonably practicable, a health assessment is performed during normal work hours.

Use of Respirators and Proper Personal Protective Equipment (Use and Limitations)

Use of Respirators

The Company shall ensure the approved respirators will be used where required.

Respirators shall be used in the following four circumstances:

- work practice controls
- work operations
- to reduce exposure
- in emergencies.

The employee will be provided at no cost to the employees and will be chosen from those approved by NIOSH.

Powered, air-purifying respirators will be available when the employees choose to use this type, or when the respirator will provide adequate protection. Air-purifying respirators do not supply oxygen.

Proper PPE

The Company shall provide coveralls, gloves, head coverings, foot coverings, face shields and vented goggles for all persons within a restricted/designated work area.

The Company must provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from asbestos contamination, ensure that workers' street clothing is not contaminated by asbestos, and ensure that a worker does not leave a restricted area until the worker has been decontaminated.

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All protective clothing is disposed of as asbestos waste after use or is kept, maintained and cleaned in a safe manner each time it is used.

Before a worker removes protective clothing and equipment, the Company must ensure that the worker cleans this gear with a damp cloth or a vacuum cleaner equipped with a HEPA-filtered exhaust and ensure that a worker removes protective clothing and equipment before leaving the restricted/designated work area.

EYE PROTECTION

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids or chemical gases or vapors. Eye and Face PPE must comply with ANSI Standard Z87.1-2003 (Z87+), *Occupational and Educational Personal Eye and Face Protective Devices*.

Safety Glasses

Safety glasses, with side shields, that meet ANSI Z-87.1-2003 standards with "high Impact lenses" are required to be worn by all employees, subcontractors, and visitors while on Company property, at all times, as described below:

- At field locations, in shops and warehouses, except in approved, designated, striped safety zones.
- In all yard work zones or by everyone when in the vicinity of loading or unloading equipment, performing mechanic or maintenance work, test stand operations, operating equipment such as forklifts, welding, or any type of work which has the potential to inflict an eye injury.
- In any office, restroom, or any other building while performing any type of work where a potential eye injury may be present.
- Visitors will be provided with visitor glasses. In the absence of approved prescription safety glasses, "Over the glass" type safety glasses or goggles, must be worn over the nonsafety glasses until approved prescription safety glasses are obtained.
- Workers assisting welders must wear absorbent safety glasses that protect the wearer from ultra-violet (UV) and/or infrared rays (IR).
- Dark shaded lens (sunglasses) darker than a # 1 shade is prohibited to be worn indoors unless welding or assisting a welder.
- A doctor must support "exceptions for medical reasons" in writing to exempt safety eyewear requirements.
- Safety glasses are not required:
 - o Inside offices.
 - o Parking lots when traveling from vehicles to and from office buildings by way of main doors that do not pass through shops.

Goggles

- Chemical splash proof goggles shall be worn when handling or mixing liquid chemicals, solvents, paints, etc., and/or as recommended on the Safety Data Sheet of the material being handled.
- Dust proof goggles shall be worn when blowing equipment down with air or while performing other jobs where safety glasses are not adequate to prevent airborne particles from entering the openings around the lenses and side shields.

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Face Shields

- Full face shields shall be worn over safety glasses when operating hand held or stationery grinders with abrasive or wire wheels, while chipping paint or concrete or, performing jobs where there is the potential for flying objects striking the face and safety glasses or goggles would not provide adequate protection.

HEAD PROTECTION

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from employee initiated impact or impact from falling or other moving objects. Helmets must comply with ANSI

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Standard Z89.1-1997 Class E, *American National Standard for Industrial Head Protection* for Type II head protection or be equally effective.

- Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects.
- Hardhats are to be worn at all field, shop and warehouse locations, or where deemed necessary as per each location's PPE Hazard Assessment.
- Hardhats will not be altered in any way.
- Do not paint or apply unauthorized stickers, name plates, etc.
- Do not drill, cut, bend, or apply heat.
- Do not alter the suspension system.
- Hardhats will be inspected by the employee regularly for cracks, chips, scratches, signs of heat exposure (sun cracks), etc.
- Defective hardhats will be replaced immediately.
- Hardhats shall not be placed in rear windows of vehicles where they will be exposed to the sun or become projectiles during an accident.
- A supply of hardhats must be made available to visitors.
- COMPANY shall provide hardhats.
- Employees will be trained in the use, care and maintenance of head protection equipment.

HEARING PROTECTION

Hearing protection is required to be worn by all employees, subcontractors, and visitors while in posted "High Noise" areas. Refer to the Company Hearing Conservation Program for more information.

Warning signs will be posted in areas known or suspected to have noise levels exceeding 85 dBA either constantly or intermittently.

When signs are not posted, employees shall wear hearing protection when noise caused by machinery, tools, etc., prevents normal conversations to be heard clearly.

Rule of thumb: If you have to yell to be heard, hearing protection is required

Types

- Molded Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hard hat mounted Earmuffs and earplugs shall be provided to the employee in sizes and configurations that will be comfortable to the employee.

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Care and Maintenance

- Inspect hearing protection prior to each use.
- Hearing protection must be kept clean to prevent ear infections.
- Most earplugs used today are disposable and must be discarded when they become dirty, greasy, or cracked.
- Earmuffs that have deteriorated foam inserts, cracked seals or are defective must be replaced.

Fit

- Due to individual differences, not everyone can wear the same type of hearing protection. A variety of styles may have to be tried before one is found to be comfortable and provide adequate protection.
- Employees shall be instructed how to obtain the proper fit.

HAND PROTECTIONGloves

- Gloves are required to be worn when performing work, which may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals.
- Welding: Welding gloves made of leather or other heat resistant materials shall be worn when performing arc welding or oxy/gas cutting.
- Chemical: Impervious (chemical resistant) gloves shall be worn when handling chemicals that specify gloves as personal protection equipment when handling.
- Refer to the specific chemical's Material Safety Data Sheet for the correct glove type.
- Persons assigned to working with chemicals, i.e., solvent vats, shall be issued their own individual gloves for hygiene purposes.
- Leather: Leather gloves should be worn when working with sharp materials or when handling rigging equipment.
- Cloth: Cloth gloves should be worn when handling objects or materials, which could cause blisters, splinters, cuts, etc.
- Heat Resistant: Heat resistant gloves shall be worn when handling hot bearings, races, or other materials or objects that have been heated beyond ambient temperatures.
- Insulated: Insulated gloves shall be worn to prevent frostbite in extreme cold climates.
- Glove Inspections
 - o Gloves shall be inspected before each use for holes, tears, and worn areas.
 - o Chemical gloves shall be periodically air tested for pinholes by twisting the cuff tightly, apply low air pressure to expand the glove, and then submersing in water to check for bubbles.
 - o Defective gloves shall be discarded immediately. Exception: machinists are exempted from wearing gloves while working with rotating machinery.

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FOOT PROTECTION

Safety footwear shall be worn by all employees with regularly assigned duties at field locations, in shops and warehouses.

- Office workers and visitors who enter these areas on an infrequent basis will not be required to wear foot protection provided they stay clear of the work being performed.
- If required to be in the close proximity of the work, the work will be stopped while visiting the area or safety footwear will be worn.
- Shops, Field Locations, Warehouses and Parts Departments: Leather or equivalent boots, either lace up or pull up, shall be worn.
- The boot must provide ankle protection and have soles designed to protect from punctures with defined heels for climbing ladders.
- Metatarsal guards will be worn when duties present a hazard of equipment or material crushing the foot.
- All safety footwear must meet ANSI Z41-1999 standards.
- Client locations may require safety footwear to be worn by everyone; check with the local supervisor for client requirements before visiting field locations.

PROTECTIVE CLOTHING

Protective clothing used in conjunction with asbestos must be sealed to prevent fibers from contacting the skin. Most protective overalls are NOT fire resistant and must be kept from sources of heat and can tear if in contact with sharp objects. Any torn protective clothing must be immediately replaced.

RESPIRATORS

The following factors shall be taken into account when selecting the proper respirator:

Concentration and Type of Contaminant

The concentration and type of contaminant will determine the model and type of respirator and cartridges/filters or filters to be used. The concentration is based on a sampling of the atmosphere.

Location of Hazardous Area

(Confined Space, nearby contaminants, etc.)

Worker Activity

(Extreme heat, cold, welding hood requirement, etc.)

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Types of Respirators

Air-purifying respirators can be either full-face or half masks with mechanical or chemical cartridges to filter dusts, mists, fumes, vapors or gases.

Powered air-purifying respirators use a blower to pass the contaminated air through a filter. The purified air is then delivered into a mask or hood. They filter dusts, mists, fumes, vapors and gases, just like ordinary air-purifying respirators.

Air-purifying respirators cannot be used in oxygen-deficient atmospheres, which can result when another gas displaces the oxygen or consumption of oxygen by a chemical reaction occurs. Oxygen levels below 19.5% require either a source of supplied air or supplied-air respirator protection. Levels below 16% are considered to be unsafe and could cause death. To determine the proper cartridge for air-purifying respirators contact the COMPANY Safety Manager or a qualified on-site safety representative of the client. You should also consult the Material Safety Data Sheet of the substance that needs to be filtered.

All cartridges are assigned a color designating the type of contaminant they will filter: White:

	Acid gas
Black:	Organic vapors
Green:	Ammonia gas
Yellow:	Acid gas and organic vapors
Purple:	Radioactive materials
Orange:	Dust, fumes and mists
Olive:	Other gases and vapors

Once the wearer of the respirator can detect an odor, irritation, or taste of the contaminant, the cartridge should be replaced. All cartridges and/or filters shall be changed at the beginning of each shift.

Supplied-air respirators provide the highest level of protection against highly toxic and unknown materials. Supplied air refers to self-contained breathing apparatuses (SCBAs) and air-line respirators. SCBAs have a limited air supply that is carried by the user, allowing for good mobility and fewer restrictions than air-line respirators.

Air-line respirators have an air hose that is connected to a fresh air supply from a central source. The source can be from a compressed air cylinder or air compressor that provides at least Grade D breathing air.

Emergency Escape Breathing Apparatuses (EEBAs) provide oxygen for 5, 10 or 15 minutes depending on the unit. These are for emergency situations in which an employee must escape from environments immediately.

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dangerous to life or health (IDLH).

SCBA (Self Contained Breathing Apparatus)

COMPANY DOES NOT ALLOW EMPLOYEES TO WORK IN AN IMMEDIATELY DANGEROUS TO LIFE AND HEALTH (IDLH) ENVIRONMENT.

In order to maintain the NIOSH/MSHA approval of any respirator, mixing parts from other respirator manufacturers is prohibited. This includes airline hoses, valves, gaskets, cartridges, etc. For example, do not use North cartridges or valve gaskets with an MSA product.

Employees who require or may need to wear PPE shall be properly trained and PPE must be fitted to each affected employee. Training shall include:

- When PPE is necessary.
- What PPE is necessary.
- How to properly don, doff, adjust and wear PPE.
- The limitations of PPE (filtering respirators do not supply oxygen, etc.)
- Useful life and disposal of PPE.
- How to clean and maintain PPE in a sanitary and reliable condition.
- Reporting and replacing defective or damaged PPE, which shall NOT be used.

Waste Disposal

If a building is to be demolished, the Company must ensure that materials with the potential to release asbestos fibers are removed first. Areas where asbestos abatement activities are in progress are isolated so other areas are not contained. If a building is being altered or renovated, materials in the area of the alterations or renovations that could release asbestos fibers are encapsulated, enclosed or removed.

Asbestos containing materials removed during abatement activities are adequately contained and labeled. The Company must ensure that asbestos waste is stored, transported, and disposed of in sealed containers that are impervious to asbestos and asbestos and asbestos waste. The Company must ensure that a container of an asbestos product and asbestos waste is clearly labeled. To identify the contents as an asbestos product and carcinogenic, and to warn handlers that dust from the contents should not be inhaled.

Bags or containers shall be imprinted and clearly labeled with the following asbestos hazard warning and address:

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DANGER - CONTAINS ASBESTOS FIBERS -
 AVOID CREATING DUST - CANCER AND LUNG DISEASE HAZARD
 COMPANY - Address

Asbestos waste or dust produced in a place of employment is cleaned away promptly and at least once each day, by vacuum cleaning equipment equipped with a HEPA filter to prevent the escape of asbestos dust into the air or where vacuum cleaning is not practicable, by wet methods.

Change in Process

Where a change is made in a process involving asbestos, or in the methods and procedures in the mining, use, handling or storage of asbestos and the change could result in a significant difference in the exposure of a worker to the inhalation or ingestion of asbestos, the Company shall cause a further assessment to be made.

Record Keeping

All records relating to any asbestos activity shall be maintained by the Company permanently.

The records of the exposures of each worker to airborne asbestos at the workplace to be maintained as provided by the asbestos control program shall identify the worker, including the worker's date of birth, the worker's jobs or occupations at the workplace, the results of monitoring for exposure to airborne asbestos in his or her work area, and the use by the worker of respiratory equipment and its type.

Training

The Company shall provide asbestos awareness training for employees who do not perform asbestos abatement or removal operations but have the potential to come into contact with asbestos in the performance of their duties.

The asbestos awareness training program shall also include the potential health hazards posed to affected employees from exposure to asbestos to include lung cancer, asbestosis, mesothelioma, colon cancer, and cancer of the stomach.

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The asbestos awareness training program shall also inform employees to not disturb asbestos containing materials. prohibit unauthorized Company employees from disturbing asbestos containing materials. The Company also requires the placement of signs and labels to identify where asbestos is present and located, coupled with the appropriate work practices to ensure that asbestos containing materials (ACM) and presumed asbestos containing materials (PACM) are not inadvertently disturbed.

The training should be provided prior to or at the time of initial assignment and at least annually thereafter.

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Purpose

The purpose of this program is to set forth procedures for the assembly and disassembly (general requirements) of cranes and derricks in construction as required by 29CFR 1926.1404.

Scope

This program applies to all Company employees, temporary employees and contractors. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. NOTE: Company employees DO NOT assemble / disassemble cranes.

Requirements

SUPERVISION OF ASSEMBLY/DISASSEMBLY

The assembly/disassembly (A/D) of equipment is directed by a person considered both competent and qualified. A/D must be directed by a person who is both competent and qualified or by a competent person who is assisted by one or more qualified persons. This person is considered the A/D director.

OSHA defines a Competent and Qualified person as the following:

- Competent Person – "One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees and who has authorization to take prompt corrective measures to eliminate them."
- Qualified Person – "A person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, successfully demonstrated the ability to solve/resolve problems relating to the subject matter, the work, or the project."

The A/D director must understand and be knowledgeable in the applicable assembly/disassembly procedures prior to the commencement of such activities involving A/D.

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CREW MEMBER KNOWLEDGE REQUIREMENTS

Crew members must understand their tasks prior to commencing A/D activities. The A/D director is responsible for ensuring crew members are knowledgeable of their tasks prior to commencing work.

Crew members must understand the hazards associated with their tasks. Prior to starting work, the A/D director is responsible for ensuring crew members are knowledgeable of the hazards associated with their tasks.

Crew members must understand the hazardous positions/locations they need to avoid before commencing work. The A/D director is responsible for ensuring crew members are knowledgeable before commencing work of the hazardous positions/locations they need to avoid.

HAZARD IDENTIFICATION

The A/D director shall be responsible for addressing the specific hazards associated with assembly/disassembly operations. The A/D director shall be responsible for managing specific hazards associated with assembly/disassembly operations. These include the following hazards:

- Site and ground bearing conditions
- Blocking material
- Proper location of blocking
- Verifying assist crane loads
- Boom and jib pick points
- Center of gravity
- Stability upon pin removal
- Snagging
- Struck by counterweights
- Boom hoist brake failure
- Loss of backward stability
- Wind speed and weather

LOAD CONTROL

Rated capacity limits for loads must not be exceeded for the equipment being assembled/disassembled. Rated capacity limits for loads imposed on the equipment, equipment components (including rigging), lifting lugs and equipment accessories, must not be exceeded for the equipment being assembled/disassembled during all phases of assembly/disassembly.

OUTRIGGERS AND STABILIZERS

When the load to be handled and the operating radius require the use of outriggers or stabilizers, or at any time when outriggers or stabilizers are used, all of the following requirements must be met:

- The outriggers or stabilizers must be either fully extended or, if manufacturer procedures permit,

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deployed as specified in the load chart.

- The outriggers must be set to remove the equipment weight from the wheels, except for locomotive cranes. This provision does not apply to stabilizers.
- When outrigger floats are used, they must be attached to the outriggers. When stabilizer floats are used, they must be attached to the stabilizers.
- Each outrigger or stabilizer must be visible to the operator or to a signal person during extension and setting.
- Outrigger and stabilizer blocking must be placed only under the outrigger or stabilizer float/pad of the jack or, where the outrigger or stabilizer is designed without a jack, under the outer bearing surface of the extended outrigger or stabilizer beam.
- For locomotive cranes, when using outriggers or stabilizers to handle loads, the manufacturer's procedures must be followed. When lifting loads without using outriggers or stabilizers, the manufacturer's procedures must be met regarding truck wedges or screws.

RIGGING

When rigging is used for assembly/disassembly Company must ensure that:

- The rigging work is done by a qualified rigger.
- Synthetic slings are protected from abrasive, sharp or acute edges and configurations that could cause a reduction of the slings rated capacity, such as distortion or localized compression.
- When synthetic slings are used, the synthetic sling manufacturer's instructions, limitations, specifications and recommendations must be followed.

INSPECTION

A post assembly inspection upon completion. The post assembly inspection shall insure the selection of components, and the configuration of equipment that affect the safe operation of the crane are in accordance with manufacturer instructions, prohibitions, limitations and specifications.

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Purpose

The purpose of this program is to provide requirements to eliminate all injuries resulting from possible malfunctions, improper grounding and/or defective electrical tools. This program applies to all sites, employees and contractors and shall be used on owned premises.

Definitions

Competent Person - one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Ground Fault Circuit Interrupter - a device for the protection of personnel that functions to de-energize a circuit or portion thereof within an established period of time when a current to ground exceeds some predetermined value that is less than that required to operate the overcurrent protective device of the supply circuit.

Responsibilities

Foremen are designated as Competent Persons for the Assured Equipment Grounding Conductor Program and are responsible for implementation.

Employees are responsible for following the requirements of this program, to perform visual inspections and to take defective equipment out of service.

Procedure

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ASSURED GROUNDING

OSHA requires that employers shall use either ground fault circuit interrupters (GFCI) or assured equipment grounding conductor program to protect personnel from electrical shock while working.

- The Company shall use GFCI's in lieu of an assured grounding program.

GROUND FAULT CIRCUIT INTERRUPTERS

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords shall use a GFCI.
- Additionally, approved GFCI's shall be used for 240-Volt circuits in the same service as described above.
- GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

ASSURED EQUIPMENT GROUNDING CONDUCTOR PROGRAM

The Assured Equipment Grounding Conductor Program (AEGCP) shall cover all cord sets, receptacles not a part of the permanent wiring of a structure and equipment connected by cord and plug on all construction and maintenance sites.

This written description of the program shall be kept at the jobsite for inspection and copying by OSHA and any affected employee.

Removing Equipment:

- All equipment found damaged or defective or which fails any of the prescribed inspections or tests may not be used until repaired or replaced. All defective or failed equipment must be tagged with a red "do not operate tag" until repaired and tested or rendered unusable and discarded.

Daily Visual inspections – The following shall be visually inspected before each day's use for external defects (such as deformed or missing pins or insulation damage) and for indication of possible internal damage:

- Cord sets;
- Attachment caps;
- Plug and receptacle of cord sets;
- Any equipment connected by cord and plug; and
- Damaged items shall not be used until repaired or discarded.

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Continuity Testing – Testing must ensure continuity and be electrically continuous. The tester shall use either a continuity tester or an ohmmeter for testing equipment grounding conductors on the following:

- All cord sets;
- Receptacles that are not a part of the permanent wiring of the building or structure; and
- All plug-connected equipment required to be grounded.

Grounding Conductor Testing – The tester shall use either a continuity tester or an ohmmeter for testing. Each receptacle and plug of the following shall be tested for correct attachment of the equipment grounding conductor and the equipment grounding conductor shall be connected to its proper terminal:

- All cord sets;
- Receptacles that are not a part of the permanent wiring of the building or structure; and
- All plug-connected equipment required to be grounded.

Test Frequency – All required tests shall be performed with the following frequency:

- Before first use;
- Before equipment is returned to service following any repairs;
- Before equipment is used after any incident that can be reasonably suspected to have caused damage; and
- At intervals not to exceed 3 months, except that cord sets and receptacles that are fixed and not exposed to damage shall be tested at intervals not to exceed six months.

All tests shall be documented to identify each receptacle, cord set and cord and plug-connected equipment that passed the test, the date of the test and the individual responsible for the test. Records shall be made available at each job site for inspection by employees and OSHA.

All tested cord sets and cord and plug-connected equipment shall be marked, one or both ends, with colored tape to denote the month that the tests were performed. The below color code chart that must be followed for marking.

Month #	Month	Color of Tape to Apply to Cords
1	Jan	Red
2	Feb	Yellow
3	Mar	Green
4	Apr	Blue
5	May	Brown
6	Jun	White
7	Jul	Start over with Red and repeat

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Purpose

The purpose of this program is to define work practices, administrative procedures and engineering controls to protect employees exposed to benzene concentrations above the OSHA action level. This plan shall be implemented and kept current by the Safety Manager as required to reflect the most recent exposure monitoring data.

Scope

This program covers all employees who may be exposed to benzene in the course of completing job duties. This written plan shall be made available to the Assistant Secretary, the Director, affected employees and designated employee representatives. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Employees will be aware of provisions of site-specific contingency/emergency plans by either Company or of a facility owner.

The Company EHS Manager will develop and implement project/task specific benzene control procedures prior to the start of activities that may include exposure to benzene. The Company will be aware of an owner's contingency plan provisions and all employees must be informed where benzene is used in host facility and aware of additional plant safety rules.

Areas where benzene may be found - Benzene may be encountered at refineries and laboratories, during refueling and tank gauging, and when completing oil field and pipeline maintenance operations.

Definitions

- Action Level – means an airborne concentration of benzene of 0.5 ppm calculated as an 8-hour time- weighted average.
- What Benzene Looks and Smells Like – Benzene is a clear, colorless liquid with a pleasant, sweet odor. The odor of benzene does not provide adequate warning of its hazard.
- Employee Exposure – exposure to airborne benzene that would occur if the employee were not using respiratory protective equipment.

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- Health Effects of Benzene Exposure – Benzene can affect your health if you inhale it, or if it comes in contact with your skin or eyes. Benzene is also harmful if you happen to swallow it. If you have short-term (acute) exposure to high concentrations of benzene, well above the levels where its odor is first recognizable, you may feel breathless, irritable, euphoric, or giddy; you may experience irritation in eyes, nose, and respiratory tract. You may develop a headache, feel dizzy, nauseated, or intoxicated. Severe exposures may lead to convulsions and loss of consciousness. Long-term (chronic) exposure. Repeated or prolonged exposure to benzene, even at relatively low concentrations, may result in various blood disorders, ranging from anemia to leukemia, an irreversible, fatal disease. Many blood disorders associated with benzene exposure may occur without symptoms.

Key Responsibilities

MANAGER OR DESIGNEE

- Ensure personnel are aware of work that has the potential of exposure to benzene.
- Ensure individuals responsible for monitoring areas of exposure are properly trained.
- Ensure personnel receive documented medical surveillance exams.
- Ensure that emergency exams are performed if an overexposure or suspected overexposure occurs.

SUPERVISORS

- Ensure employees have the appropriate personal protective equipment (PPE) and are properly trained in its use and care.
- Ensure employees comply with the benzene control program.

EHS MANAGER

- In coordination with the Manager, develop and implement project/task specific benzene control procedures prior to the start of activities that may include exposure to benzene.
- Coordinate monitoring activities, ensuring monitoring equipment is in proper working order and, as necessary, modifying the benzene control procedures to reflect exposure monitoring data.
- Maintain the benzene control program, notify management of any regulatory changes and ensure compliance with regulatory, client and corporate requirements.
- Coordinate training activities.
- Coordinate the medical surveillance program, including maintenance of medical records and administration of exams.
- Ensure fire extinguishers shall always be readily available where benzene is used/stored. Benzene liquid

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is highly flammable, and vapors may form explosive mixtures in air. Fire extinguishers must be readily available in areas where benzene is used or stored.

EMPLOYEES

- Comply with the benzene control program.
- Know where benzene is used at COMPANY or client facilities and follow any of additional plant safety rules required by the client.
- Comply with the medical surveillance program and attend examinations as required.
- Maintain respiratory protection equipment in good working order and notify the supervisor or Safety Representative of any problems prior to starting work
- Review safety data sheets or consult with the supervisor to identify any container with benzene containing material.
- Sources of ignition must be kept away from benzene. Benzene liquid is highly flammable. It should be stored in tightly closed containers in a cool, well-ventilated area. Benzene vapor may form explosive mixtures in air. All sources of ignition must be controlled. Smoking is prohibited in areas where benzene is used or stored.
- Report exposures resulting in any symptoms immediately.

Procedure

PERMISSIBLE EXPOSURE LIMITS

The time-weighted average limit (TWA) for benzene is:

- 8-hour TWA 1 ppm
- 12-hour TWA 0.67 ppm

The short-term exposure limit (STEL) for benzene is 5 ppm.

REGULATED AREAS

- The Company shall establish regulated areas wherever airborne concentration of benzene exceeds or can reasonably be expected to exceed the PEL or STEL.
- The Company will control access to regulated areas and limit access to authorized personnel.

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- Safety precautions such as prohibition of smoking in areas where benzene is used/stored shall be taken. Smoking is prohibited in areas where benzene is used or stored. The following signage shall be posted in all regulated areas when the potential exists for benzene vapors to be in excess of the PEL:

DANGER – BENZENE REGULATED AREA CANCER CAUSING AGENT FLAMMABLE – NO SMOKING AUTHORIZED PERSONNEL ONLY RESPIRATOR REQUIRED

METHODS OF COMPLIANCE

- The benzene control program shall be written and implemented to comply with OSHA regulation 29 CFR 1910.1028 (Benzene).
- COMPANY shall establish and implement a written program to reduce employee exposure to or below the PEL primarily by means of engineering and work practice controls to ensure compliance with the benzene control program and federal and state requirements.

EXPOSURE MONITORING

Exposure monitoring shall be performed for the 8-hour and 12-hour TWAs or for the 15 minute STEL exposure when:

- Regulated areas are established
- An emergency occurs that could require a regulated area
- A change in the production, process, control equipment, personnel or work practices may result in new or additional exposure to benzene
- Cleanup of a spill, leak repair, or rupture occurs
- If the monitoring required reveals employee exposure at or above the action level but at or below the TWA, the Company shall repeat the monitoring for each employee at least every year.
- If the initial monitoring reveals employee exposure to be below the action level COMPANY may discontinue the monitoring.
- If the monitoring reveals that employee exposures, as indicated by at least two consecutive measurements taken at least 7 days apart, are below the action level COMPANY may discontinue to monitor.
- Direct reading detection instruments (Drager CMS is recommended) will be used where benzene vapors may be present in work areas not previously monitored.
- Personal monitoring will be performed by use of vapor monitoring badges following manufacturer requirements. All samples shall be analyzed at an AIHA (American Industrial Hygiene Association) certified laboratory.

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MEDICAL SURVEILLANCE

- Baseline and annual medical exams shall be provided to employees that may work or are anticipated to participate in operations more than 10 times per year or may work in areas where benzene exposures may exceed the PEL over 30 days per year.
- The Company shall make available a medical surveillance program for employees who are or may be exposed to benzene at or above the action level 30 or more days per year; for employees who are or may be exposed to benzene at or above the PELs 10 or more days per year; for employees who have been exposed to more than 10 ppm of benzene for 30 or more days in a year prior to the effective date of the standard when employed by their current employer.
- Notification of monitoring results shall be provided to employees in writing within 15 working days of receipt of results.

WHAT PERSONAL PROTECTIVE EQUIPMENT IS USED TO PROTECT EMPLOYEES FROM BENZENE

- Respirators are required for those operations in which engineering controls or work practice controls are not feasible to reduce exposure to the permissible level.
- Protective Clothing. You must wear appropriate protective clothing (such as boots, gloves, sleeves, aprons, etc.) over any parts of your body that could be exposed to liquid benzene.
- You must wear splash-proof safety goggles if it is possible that benzene may get into your eyes. In addition, you must wear a face shield if your face could be splashed with benzene liquid.
- PPE will be selected on the basis of its ability to prevent absorption, inhalation and ingestion.
- PPE will reflect the needs of the employee based on work conditions, amount and duration of exposure and other known environmental factors but shall contain as a minimum; boots, proper eye protection, gloves, sleeves, aprons and others as determined.
- PPE shall be provided and worn when appropriate to prevent eye contact and limit dermal exposure to liquid benzene. PPE must meet the requirements of 29 CFR 1910.133 and provided at no cost to the employees.
- PPE shall be provided at no cost to the employees.

RESPIRATORY PROTECTION

- A respiratory protection program shall be established in accordance with 29 CFR 1910.134. Respiratory protection is required:
 - o During the time period necessary to implement engineering controls or work practices.
 - o When engineering and work practices are not feasible.
 - o In emergencies.

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Approved respirators shall be selected according to airborne concentrations of benzene or condition of use.

- 0 to 0.67 ppm – no respirator required
- 0.67 to 6.7 ppm – half-mask respirator with OV cartridges
- 6.7 to 33 ppm – full-face respirator with OV cartridges
- Greater than 33 ppm – Due to the Company policy of not permitting SCBA no employee shall enter a space containing more than 33 ppm.

RECORDKEEPING

- Medical surveillance records shall be maintained for 30 years after termination of employment
- Exposure monitoring records shall be maintained for 30 years after completion of the project
- Exposure and medical monitoring records shall be made available to affected employees or their representatives and to OSHA upon request

COMMUNICATION OF BENZENE HAZARDS

- Signs and labels shall be posted at entrances of regulated areas
- The benzene control program shall be updated by the Company EHS Manager
- Project site specific contingency and emergency procedures shall be updated by the EHS Manager and made available to project staff prior to beginning work at the specific site.

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Purpose

This Bloodborne Pathogen Exposure Control Plan has been established to ensure a safe and healthful working environment and act as a performance standard for all employees. This program applies to all occupational exposure to blood or other potentially infectious materials. The content of this plan complies with OSHA Standard 29 CFR 1910.1030 (Occupational Exposure to Bloodborne Pathogens).

Scope

All employees who have or may have the potential for exposure to blood or other potentially infectious materials in the workplace.

Key Responsibilities

EXPOSURE CONTROL OFFICER (EHS MANAGER)

Has overall responsibility for developing and implementing the Exposure Control Procedure for all facilities.

SITE PROJECT MANAGER AND SUPERVISORS

Site project manager and supervisors are responsible for exposure control in their respective areas.

EMPLOYEES

- Know what tasks they perform that have occupational exposure.
- Plan and conduct all operations in accordance with our work practice controls.
- Develop good personal hygiene habits.

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Procedure

TRAINING

Employees with reasonable anticipated occupational exposure to bloodborne pathogens shall participate in training before their initial assignment and within one year of any previous training. Training shall include:

- What bloodborne pathogens are; how to protect themselves from exposure
- Methods of warnings (signs, labels, etc.)
- The OSHA requirements of bloodborne pathogens
- Availability of the Hepatitis B vaccine that have occupational exposure at no cost



Biohazard Label

AVAILABILITY OF PROCEDURE TO EMPLOYEES

The Bloodborne Exposure Control Plan is kept at all locations and shall be accessible to employees.

REVIEWS AND UPDATE OF THE PROCEDURE

The procedure is reviewed annually and updated whenever we establish new functional positions within our facility that may involve exposure to biohazards.

EXPOSURE DETERMINATION

- There are no job classifications in which some or all employees have occupational exposure to bloodborne pathogens that may result from the performance of their routine duties.
- Designated employees are trained to render first aid and basic life support. Rendering first aid or basic life support will expose employees to bloodborne pathogens and will require them to adhere to this program.
- In addition, no medical sharps or similar equipment is provided to, or used by, employees rendering first aid or basic life support.
- This exposure determination has been made without regard to the Personal Protective Equipment that may be used by employees.

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Methods of Compliance

UNIVERSAL PRECAUTIONS

Under all circumstances in which differential between bodily fluids is difficult or impossible, all bodily fluids will be considered potentially infectious.

ENGINEERING CONTROLS

Hand washing facilities (or antiseptic hand cleansers or antiseptic towelettes), which are readily accessible to all employees who have the potential for exposure. Containers for contaminated reusable sharps that our clients provide have the following characteristics: Puncture-resistant; Color-coded or labelled with a biohazard warning label; Leak-proof on the sides and bottom.

Secondary containers which are: Leak-proof; Color-coded or labelled with a biohazard warning label; Puncture-resistant, if necessary.

Engineering controls should be examined and maintained or replaced on a regular schedule to ensure their effectiveness.

WORK PRACTICE CONTROLS

- Employees shall wash their hands immediately, or as soon as feasible, after removal of potentially contaminated gloves or other personal protective equipment.
- Following any contact of body areas with blood or any other infectious materials, employees wash their hands and any other exposed skin with soap and water as soon as possible.
- Hand washing facilities shall be available. If hand washing facilities are not feasible, Company will provide either an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes.
- Contaminated needles and other contaminated sharps should not be handled if you are not AUTHORIZED or TRAINED to do so. Contaminated needles and other contaminated sharps are not bent or recapped.
- Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas

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where there is potential for exposure to bio-hazardous materials.

- Food and drink is not kept in refrigerators, freezers, on countertops or in other storage areas where potentially infectious materials are present.
- All equipment or environmental surfaces shall be cleaned & decontaminated after contact with blood or other potentially infectious materials.
- Specimens of blood or other potentially infectious materials must be put in leak proof bags for handling, storage and transport.
- If outside contamination of a primary specimen container occurs, that container is placed within a second leak proof container, appropriately labelled, for handling and storage.
- Bloodborne pathogens kits are located on top of first aid kits and are to be used in emergency situations by the caregiver. Once the seal is broken on the kit and any portion has been used it is not to be reused. Pathogen kits shall be ordered and replaced promptly. Biohazard bags are identified by stickers and located in the first aid area. Contaminated supplies are to be disposed of at once.

PERSONAL PROTECTIVE EQUIPMENT

Company provides, at no cost to our employees, gloves, safety glasses, goggles, gowns, face shields/masks and other as needed PPE for bloodborne pathogens response. All PPE shall be of the proper size and readily accessible.

Our employees adhere to the following practices when using their personal protective equipment:

- Any garments penetrated by blood or other infectious materials are removed immediately.
- All potentially contaminated personal protective equipment is removed prior to leaving a work area.
- Gloves are worn whenever employees anticipate hand contact with potentially infectious materials or when handling or touching contaminated items or surfaces.
- Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an "exposure barrier".
- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
- Any PPE exposed to bloodborne pathogens shall be disposed of properly.
- PPE should be cleaned, laundered & properly disposed of if contaminated.
- Company will repair and replace PPE as needed to maintain its effectiveness.

HOUSEKEEPING

Our staffs shall adhere to the following practices:

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- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious materials.
- Protective coverings (such as plastic trash bags or wrap, aluminum foil or absorbent paper) are removed and replaced.
- All trash containers, pails, bins, and other receptacles intended for use routinely are inspected, cleaned and decontaminated as soon as possible if visibly contaminated.
- Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.).

POST-EXPOSURE AND FOLLOW UP

Post-Exposure Evaluation & Follow-Up

If there is an incident where exposure to bloodborne pathogens occurred, we immediately focus our efforts on investigating the circumstances surrounding the exposure incident and making sure that our employees receive medical consultation and immediate treatment.

The Company SEHS Manager/Supervisor investigates every reported exposure incident and a written summary of the incident and its causes is prepared and recommendations are made for avoiding similar incidents in the future. We provide an exposed employee with the following confidential information:

- Documentation regarding the routes of exposure and circumstances under which the exposure incident occurred.
- Identification of the source individual (unless not feasible or prohibited by law).

Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified healthcare professional to discuss the employee's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

Information Provided to the Healthcare Professional. We will forward the following:

- A copy of the Biohazards Standard.
- A description of the exposure incident.
- Other pertinent information.

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Healthcare Professional's Written Opinion

After the consultation, the healthcare professional provides our facility with a written opinion evaluating the exposed employee's situation. We, in turn, will furnish a copy of this opinion to the exposed employee. The written opinion will contain only the following information:

- Whether Hepatitis B Vaccination is indicated for the employee.
- Whether the employee has received the Hepatitis B Vaccination.
- Confirmation that the employee has been informed of the results of the evaluation.
- Confirmation that the employee has been told about any medical conditions resulting from the exposure incident which require further evaluation or treatment.
- All other findings or diagnoses will remain confidential and will not be included in the written report.

RECORD KEEPING

All records shall be made available upon request of employees, OSHA's Assistant Secretary and the Director of OSHA for examination and copying. Medical records must have written consent of employee before released. Company shall meet the requirements involving transfer of records set forth in 29 CFR 1910.1020(h).

The respective Human Resources representative shall maintain Bloodborne Pathogen exposure records.

Employee medical records shall be kept confidential and are not to be disclosed without the employee's written consent, except as required by 29 CFR 1910.1030 or other law.

Medical records shall be maintained for the duration of employment plus 30 years and shall include at least the following:

- Employee's name, Social Security number and Company employee number.
- Employee's Hepatitis B vaccination status, including vaccination dates.
- All results from examinations, medical testing and follow-up procedures, including all health care professional's written opinions.
- Information provided to the health care professional.
- Any Hepatitis B Vaccine Declinations.

Training records shall be maintained for 3 years from the date on which the training occurred and shall include at least the following:

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- Outline of training program contents.
- Name of person conducting the training.
- Names and job titles of all persons attending the training.
- Date of training.

LABELS AND SIGNS

Biohazard warning labelling shall be used on containers of regulated waste; Sharps disposal containers; contaminated laundry bags and containers; contaminated equipment.

INFORMATION

Information provided to our employees includes:

- The Biohazards Standard itself.
- The epidemiology and symptoms of bloodborne diseases.
- The modes of transmission of bloodborne pathogens.
- Our facility's Exposure Control Procedure (and where employees can obtain a copy).
- Appropriate methods for recognizing tasks and other activities that may involve exposure.
- A review of the use and limitations of methods that will prevent or reduce exposure.
- Selection and use of personal protective equipment.
- Visual warnings of biohazards within our facility including labels, signs and "color-coded" containers.
- Information on the Hepatitis B Vaccine.
- Actions to take and persons to contact in an emergency involving potentially infectious material.
- The procedure to follow if an exposure incident occurs, including incident reporting.
- Information on the post-exposure evaluation and follow-up, including medical consultation.

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Purpose

This business continuity plan has been established to ensure that critical business functions will be available to customers in the event of a natural or human-induced disaster.

Scope

This plan shall apply to all Company locations.

Phased Planning

Phase 1 – Preparation

The very nature of crisis means, it can't be predicted when a crisis might happen, we plan for the most inconvenient times – weekends, early morning or late evening. In view of this it is recommended that copies of this plan are kept by each member of the management team both at the workplace and at home.

Phase 2 – Disaster Occurs

For Level 2 we need to be able to service clients based upon a priority ranking. Some major impact consideration will include:

- supply shortages as hoarding begins
- revenue falls as customers delay work
- staffing difficulties as employees choose not to travel
- employee relocation to time-sensitive projects
- unavailability to accommodate customer needs

Phase 3 – Pandemic Crisis

In this situation it is the mission of the government bodies to minimize serious illness and overall deaths and second to minimize societal disruptions among the public. Some major impact consideration will include:

- government acts to reduce unnecessary travel and potential for person-to-person contact, leading to revenue losses

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- public transport systems reduced/closed down
- fuel supplies rationed to only essential workers
- food supplies rationed to only essential businesses and public
- governments will close all non-essential services

Business Continuity Core Planning

If the home office facility is closed or not able to be used:

- Management staff members based out of the home office that have a functioning laptop will communicate from home at which time initial plans will be discussed. Internet access and telephone/fax lines must be available.
- Management will notify office employees as soon as possible what the initial contingency plan is and where staff members can meet for further information.
- Management will watch closely the legal announcements of governmental bodies. This is to ensure compliance with local and federal announced requirements.
- If travel to a facility is not possible then the emergency essential employees contact list will be used to allow work for essential employees from their homes if necessary. (This will always be the contingency plan unless otherwise specified by our president and CEO).

Emergency Essential Employees Contact List (triple version = list kept in office, in car, at home):

- Key Management Personnel - a contact list including home and mobile phone numbers in triple version
- Successor Planning - "Alternates" for key positions if unavailable for an undetermined time.
- Travel Planning - No more than 2 senior management members should travel together in the same means of transportation, i.e. plane or car.
- Request clients to provide emergency contact number in case the clients facility is closed since "not essential service" (home phone number if client's ok)
- Management will have employee's home phone numbers (triple version) in order to inform them about eventual closing of the unit.
- Client contacts – a list of clients and their emergency contact data is to be maintained.

Crisis Considerations

Human Resources:

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- Implement a report to work policy - if in doubt, in a crisis, all workers must report by phone to their supervisor for information.
- Emergency leave processing.
- Accommodations for workers where required.
- Calling staff to find out who's coming and how many hours they can make or find alternative staffing.
- Assist with records of hours worked and finding a way to get people paid.
- When public transport is down and also gas shortages at gas stations become obvious, staff transportation needs to be coordinated.

Purchasing:

- Contingency planning must identify current stock of equipment and alternate sources.
- Minimum tank filling: all key personnel and company owned vehicles trucks should keep tank at least half filled to ensure in gas shortage crisis situation a minimum of travel is possible

Money:

- Since banks are most likely closed, how will employees, suppliers and contractors be paid?

IT & Computer:

- IT backup of data is required and to be maintained
 - IT system back-up must be on a different power grid system or have separate power backup
- Evacuation Planning

The below areas are identified for severe weather and evacuation planning:

Equipment that needs to be Moved/Stored/Secured from Weather within 24 Notice of Severe Weather

- All essential equipment is stored inside our warehouse.

Equipment Transport - What and Who

Equipment	Personal Computer	Vehicles	Priority Documents

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Designated Person	Owner of that Computer	Primary Driver of Vehicle	Management Personnel

Evacuation Plan Location & Communications

Company personnel will evacuate in accordance with the following requirements:

Location of Staff	Home Office
Assembly Area	Flag Pole in office parking lot
Secondary Site Based on Severity	Warehouse across the street from main office

The Company EHS Manager is responsible for ensuring communications to receive directions on when to return based on local governmental and federal disaster guidelines. The Company EHS Manager shall maintain a list of all Company personnel and phone contacts and document all on duty personnel are notified and accounted for.

How Will Left Behind Equipment Be Secured?

- Office doors will be locked with all reasonable and capable of being safely lifted equipment on top of desks.
- Vehicles will be locked with parking brakes on.

Demobilization of Environmentally Sensitive Equipment (i.e., fuels, etc.)

- Company will remove as many company-assigned vehicles as possible.

Training

- All Company employees will receive a copy of this plan and it shall be posted.

Electronic and Written documentation

- All electronic information is backed up via the Company intranet for emails.
- Critical Company documents will be in the possession of the senior manager for each site.

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Remobilization

- The Company EH&S Officer is the designated point of contact and will determine (in conjunction with state and federal officials) when roads, field conditions, site safety, etc. determine it is safe to return to the work site.

Communication with Personnel during Evacuation

- The Company EH&S Manager will confirm all effected staff have evacuated.
- Once enough time has elapsed the Company EHS Manager will confirm all staff are at the designated Assembly Area.
- Evacuated employees are not to leave the Assembly Area or Secondary Area without notifying the Company.

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Purpose:

The purpose of this program is to establish requirements for the use and handling of materials that expose employees to cadmium and/or hexavalent chromium.

Scope

This program covers all employees.

Key Responsibilities

MANAGERS/SUPERVISORS

- Shall ensure that all employees are aware of the proper work procedures for cadmium and hexavalent chromium.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.
- As part of the JSA and other hazard evaluation processes, identifies and evaluates chromium or cadmium hazards and potential exposures during planning and the conduct of work.
- Reviews and approves the Task-Specific Safety Analysis.
- As necessary, quantitatively determines the presence of chromium or cadmium in materials, substrates, and other media. This may involve the collection of samples for analysis by a qualified laboratory or field testing using acceptable test methods.
- Provides results of any chromium or cadmium survey to management/supervision, along with information regarding hazard potential and control measures. As appropriate, makes recommendations to management/supervision to maintain, modify, upgrade, or downgrade controls accordingly.
- Takes prompt corrective measures (or supports any Competent Person in this role) to eliminate hazards, such as recommending to management/supervision to implement or modify engineering, administrative, work practice, and personal protection (including respiratory protection) controls.
- Conducts periodic exposure assessment.
- As appropriate, assists management/supervision in ensuring that workers have the necessary training and medical surveillance based on the activity and hazard.
- Ensures that medical monitoring is conducted in accordance with 29 CFR 1926.1126 (for chromium) or 29 CFR 1926.1127 (for cadmium) including imposition of work restrictions where appropriate and

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reviewing results of medical monitoring.

- In evaluating chromium or cadmium hazards and specifying controls for a job, (a) utilizes reliable historical exposure monitoring data generated for other similar operations or activities, (b) utilizes objective data, and/or (c) plans and conducts initial monitoring to determine exposures and assess the effectiveness of hazard controls.
- Conducts initial and periodic exposure monitoring in accordance with National Institute for Occupational Safety and Health (NIOSH)/OSHA methods if lacking historical or objective data.
- Maintains effective records of jobs monitored, so that a historical database can be used to specify controls and eliminate unnecessary and redundant monitoring for future activities.
- Supports project management/supervision in responding to exposures above the PEL when workers were not adequately protected.
- As appropriate, participates in pre-job and daily worker briefings regarding task-specific chromium or cadmium hazards and controls, work practices/plans (such as JSAs), and other applicable information, including any changes that are made to controls or to the work practices or plans.

EMPLOYEES

- Shall follow all requirements regarding the safe work procedures for cadmium and hexavalent chromium.

Cadmium Procedure

COMPLIANCE PROGRAM

A written compliance program shall be implemented when the PEL for cadmium is exceeded at a work site. The

following areas shall be addressed within the site compliance program:

- Potential exposure determination including a description of each operation where cadmium is omitted, machinery use, material processed, controls in place, crew size, employee job responsibilities and maintenance practices.
- Air monitoring data or developing a justification for not conducting monitoring based on previous monitoring/historical data or objective data.
- Engineering controls including the specific means that will be employed to meet compliance.
- A report of technology considered in meeting the PEL.
- A detailed schedule of implementation.
- Consideration of respiratory protection.

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- Written plan for emergency situations.
- Work practice program.
- Other relevant information such as protective clothing, housekeeping, hygiene areas and practices (including consideration of shower facilities), consideration of medical surveillance, training and recordkeeping.

The written program must be reviewed and updated annually or more often to reflect significant changes in the compliance status for Company.

The program shall be provided for examination and copying upon request of affected employees, their representatives or OSHA officials.

The program shall include maintenance procedures while working on ventilation systems and changing of filters to minimize employee exposure while performing such maintenance.

Construction work activities that result in exposure to chromium or cadmium may include, but are not limited to, the following:

- Demolition or salvage of structures where chromium or cadmium, or materials containing chromium or cadmium, are present.
- Removal or encapsulation of materials containing chromium or cadmium.
- New construction, alteration, repair, or renovation of structures and substrates that contain chromium or cadmium.
- Installation of products containing chromium or cadmium.
- Working with/around Portland cement (in powder or dust form – chromium only).
- Torch-cutting chromium/cadmium containing paints.
- Transportation, disposal, storage, or containment of chromium or cadmium, or materials containing chromium or cadmium.
- Maintenance operations associated with construction activities.
- Welding, cutting, burning, or grinding stainless steel, chromium-/cadmium-containing alloy steel, and chromium/cadmium containing alloys.

Note!!! Exposure to chromium (especially hexavalent chromium) has also occurred when the welding rod or wire in use contains chromium.

The permissible exposure limit (PEL) for cadmium and hexavalent chromium is five (5) micrograms calculated as an 8-hour time-weighted average over a work shift. The action level (AL) of 2.5 micrograms triggers the following requirements:

- Pre-job planning includes, as needed, a thorough identification of chromium or cadmium materials. Identification may include the product name, a Material Safety Data Sheet (MSDS) with the MSDS number (if available) or a sample content analysis. Sampling data includes location, sampling method, sampling dates, laboratory identification, and analytical method.
- If documentation is not feasible or has been determined by the project engineer to be unavailable or unreliable, chromium or cadmium content sufficient to exceed the action level for chromium or cadmium is assumed.

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Results of bulk sampling, calculations of potential chromium or cadmium exposure, and other data that demonstrate compliance with this practice (as well as the pertinent standards) are attached to the work package.

Where chromium or cadmium exposure above the action level is suspected, and in the absence of monitoring data, interim protective measures are established that are equal to or greater than the assumed exposure level.

Hexavalent Chromium Procedure

WELDING, CUTTING, AND GRINDING

Certain welding and cutting activities have been shown to expose the welder/cutter, and potentially helpers, to hexavalent chromium above the action level when exhaust ventilation is not used. The activities have included the following:

- Shielded metal arc welding, Gas metal arc welding
- Flux cored arc welding, Sub arc welding
- Torch cutting through chromate-containing paints, grinding chromium-containing metals.

The types of metal involved have been stainless steel, chromium-containing alloy steel, and chromium-containing nonferrous alloys. Exposure has also occurred when the welding rod or wire in use contains chromium, and exhaust ventilation is not used.

Therefore, exhaust ventilation is always prescribed as a control measure when activities with the materials mentioned above are in use unless historical personal monitoring data performed when similar materials, using similar methods, under similar environmental conditions are used shows conclusively that the welder/cutter and helper (if applicable) are not exposed above the action level without regard to respiratory protection.

Practices and procedures shall ensure that no employee is exposed to hexavalent chromium in excess of the permissible exposure level which is 5 micrograms per cubic meter of air based on an 8 hour Time Weighted Average.

PLASMA AND AIR ARC CUTTING AND GOUGING

Plasma and air arc cutting and gouging operations have been shown to expose the worker and helpers within 10 feet of the work to levels of hexavalent chromium above the permissible exposure limit (PEL) under most circumstances and conditions. Exhaust ventilation and respiratory protection (at least a half-face, tight-fitting respirator with a HEPA filter/cartridge) are always prescribed as control measures when activities with the materials mentioned above are in use; a higher level of respiratory protection may be prescribed, depending on conditions.

Note: Each discrete task must begin with ventilation and respiratory protection control measures in place. Respiratory protection may be downgraded only upon conclusive results of breathing zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than 50 percent of the protection factor of the respirator relative to the concentration and PEL of hexavalent chromium. Respiratory protection may be eliminated only upon conclusive results of breathing-zone monitoring of the employee(s) involved in each discrete task showing

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exposure to be less than the PEL as an 8-hour time-weighted average.

Additional controls may also be appropriate to be in compliance with 29 CFR 1926.1126, depending on the results of evaluations of the materials to be used, environmental conditions, length of the work process/activity, etc.

Employees who are exposed at or above the action level 30 days or more per year are enrolled in a medical surveillance program.

Personal hygiene is very important while working with chromium or cadmium products. To avoid accidental ingestion of chromium or cadmium, employees wash thoroughly (regardless of other controls) prior to eating, chewing, smoking, or drinking.

Practices

Management/Supervision supported by safety professional(s), the medical contractor and training providers conducts the following basic steps to control exposure to chromium or cadmium:

- Determine the types of projects, activities, and operations that could involve chromium or cadmium, or chromium- or cadmium-containing materials. For those jobs, conduct hazard identification as part of the work design, planning, and control process.
- If chromium or cadmium materials are involved, ensure that project safety (for chromium) or a Competent Person (for cadmium) conducts a hazard evaluation to determine the potential exposure and to recommend initial controls.
- Develop and implement a Task-Specific Safety when exposure is or is likely to be above the PEL. The JSA (or equal) addresses the scope of work activities; provides initial exposure assessment; and prescribes exposure controls, air-monitoring requirements, work practices, personal protective equipment and additional information as required.
- Incorporate recommendations from project safety for chromium or cadmium hazard control measures into any JSA and work control documents.

EXPOSURE MONITORING

Monitoring or measuring of employee exposure shall be conducted at least every 6 months if the initial monitoring shows employee exposure. Air monitoring will be performed at the beginning of each job task. If exposure monitoring results indicate exposure is above the PEL Company must include in the written notification to employees the corrective action being taken to reduce exposure to or below the PEL.

- Notify each affected employee, in writing, of the results of monitoring within five (5) working days.
- Air monitoring for chromium or cadmium may be waived provided the following conditions are met:
 - o Monitoring has been performed in the last 12 months.
 - o Data from historical monitoring originates from work operations that closely resemble the planned work operations.
 - o Workplace and environmental conditions (such as indoors or outdoors, temperature,

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wind speed, ventilation, and space configuration) are similar to those when the monitoring was performed.

- o The processes, types of material, control methods and work practices are similar.
- o Justification for waiving initial monitoring shall be included in the Task-Specific Safety Analysis or equal. Employees involved are briefed regarding the existence of such data.

SURVEILLANCE

Medical surveillance shall be provided when an employee experiences signs or symptoms of the adverse health effects of Hexavalent Chromium (dermatitis, asthma, bronchitis, etc). Medical evaluations will be provided at no cost to employees. Examinations will be performed by or under the supervision of a physician or other licensed health care professional.

FACILITIES

Company must provide change rooms for decontamination and ensure facilities prevent cross-contamination. Washing facilities shall be readily accessible for removing chromium from the skin. Workers must wash their hands and face or any other potentially exposed skin before eating, drinking or smoking.

REGULATED AREAS

Regulated areas shall be established when exposure to an employee is or is expected to be in excess of the PEL. Regulated areas shall be marked with warning signs to alert employees and access is restricted to authorized persons only.

CONTROLS

If the exposure level is above the PEL for 30 days or more then engineering controls and work practices shall be provided to reduce exposure to the lowest feasible level. If employees can demonstrate that such controls are not feasible Company shall use engineering and or work controls to reduce employee exposure to the lowest levels achievable and shall supplement them by the use of required respiratory protection.

RECORDKEEPING

Company is required to maintain and make available an accurate record of all employee exposure monitoring, medical surveillance and training records.

RESPIRATORY PROTECTION & PPE

The appropriate respirator shall be used when engineering controls and work practices cannot reduce employee exposure during work operations where engineering controls and work practices are not feasible and emergencies. Respirators shall be provided in accordance with 1910.134 (Respiratory Protection) (see Company Respiratory Protection Program). Specific requirements contained within 1926.1127 (Cadmium) regarding respiratory protection shall also be followed including:

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- Providing employees with full face piece respirators when they experience eye irritation.
- Providing HEPA filters for powered and non-powered air-purifying respirators.
- Providing a powered air-purifying respirator instead of a negative-pressure respirator when an employee entitled to a respirator chooses to use this type of respirator and such a respirator will provide adequate protection to the employee.

PPE will be provided when there is a hazard from skin or eye contact and employees are required to use the PPE. Gloves, aprons, coveralls, goggles, foot covers and other as-needed PPE shall be provided at no cost to the employee and will be removed at the end of the work shift. Company must clean, launder and replace all protective clothing as needed.

HOUSEKEEPING

All surfaces shall be maintained as free as practicable of chromium. All spills and releases of chromium shall be cleaned promptly with approved procedures including use of HEPA filtered vacuums as the primary method, dry or wet sweeping or other methods to minimize the likelihood of exposure to chromium.

No compressed air shall be used to remove chromium from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the dust cloud created by the compressed air or no alternative method is feasible.

Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

Training

Company shall provide appropriate types of training for employees who are potentially exposed to chromium or cadmium prior to their initial assignment and annually thereafter. Company will assure employee participation and maintain a record of the training contents. This training includes:

- Hazard communication training for potentially exposed employees.
- Training specified by the applicable chromium or cadmium standard for workers exposed at the action level for any one day, or who are exposed to chromium or cadmium compounds that are skin irritants.
- Respirator training if respirators are to be used.
- Provide information to workers regarding task-specific chromium or cadmium hazards and control methods, the JSA, work practices, medical surveillance and other applicable information, including any changes that are made to these controls.
- Provide training annually, as appropriate, to workers who continue to have exposure to chromium or cadmium at or above the action level on any one day.
- All training will be recorded and include the identity of the employee trained, the signature of the

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- person who conducted the training and the date of the training.
- Training records must be kept for one year.

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Purpose

The purpose of the Electrical Safety program is to set forth procedures for the safe use of electrical equipment, tools, and appliances at the Company.

Scope

This program applies to all Company employees, temporary employees, and contractors. When work is performed on a non-owned or operated site, the operator's program will take precedence. However, this document covers Company employees and contractors and will be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected Personnel - Personnel who normally use and work with electrical equipment, tools, and appliances, but who do not make repairs or perform lock out/tag out procedures.

Appliances - Electrical devices not normally associated with commercial or industrial equipment such as air conditioners, computers, printers, copiers, coffee pots, microwave ovens, toasters, etc.

Circuit Breaker - A device designed to open and close a circuit by non-automatic means and to open the circuit automatically on a predetermined over current without injury to itself when properly applied within its rating.

Disconnecting Means - A device, or group of devices, or other means by which the conductors of a circuit can be disconnected from their source of supply.

Disconnecting Switch - A mechanical switching device used for isolating a circuit or equipment from a source of power.

Double Insulated Tool - Tools designed of non-conductive materials that do not require a grounded, three-wire plug.

Ground - Connected to earth or some conducting body that serves in place of the earth.

Grounded Conductor - A conductor used to connect equipment or the grounded circuit of a wiring system to a grounding electrode or electrodes.

Ground Fault Circuit Interrupter (GFCI) - A device whose function is to interrupt the electric circuit to the load when a fault current to ground exceeds some predetermined value that is less than that required to operate the over current protective device of the supply circuit. Company will use GFCIs in lieu of an assured grounding program.

Insulated - A conductor encased within material of composition and thickness that is recognized as electrical insulation.

Premises Wiring - That interior and exterior wiring, including power, lighting, control, and signal circuit wiring together with all of its associated hardware, fittings, and wiring devices, both permanently and temporarily installed, which

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extends from the load end of the service drop, or load end of the service lateral conductors to the outlet(s). Such wiring does not include wiring internal to appliances, fixtures, motors, controllers, motor control centers, and similar equipment.

Qualified Person - One that has been trained in the repair, construction and operation of electrical equipment and the hazards involved.

Strain Relief - A mechanical device that prevents force from being transmitted to the connections or terminals of a cable or extension cord.

Class I Locations - Are those in which flammable gases or vapors are or may be present in the air in quantities sufficient to produce explosive or ignitable mixtures.

Class 1 Division 1 - Is a location (a) in which hazardous concentrations of flammable gases or vapors may exist under normal operating conditions; or (b) in which hazardous concentrations of such gases or vapors may exist frequently because of repairs or maintenance operations or because of leakage; or (c) in which a breakdown or faulty operation or equipment or processes might release hazardous concentrations of flammable gases or vapors, and might also cause simultaneous failure of electrical equipment.

Class 1 Division 2 - Is a location (a) in which volatile flammable liquids or flammable gases are handled, processed, or used, but in which the hazardous liquid, vapors, or gases will normally be confined within closed containers or closed systems from which they can escape only in case of accidental rupture or breakdown of such containers or systems, or in an abnormal operation of equipment or (b) in which hazardous concentrations of gases or vapors are normally prevented by positive mechanical ventilation, and which might become hazardous through failure or abnormal operations of the ventilating equipment; or (c) that is adjacent to a Class 1, Division 1 location, and to which hazardous concentrations of gases or vapors might occasionally be communicated unless such communication is prevented by adequate positive-pressure ventilation from a source of clean air, and effective safeguards against ventilation failure are provided.

Class II locations - Class II locations are those that are hazardous because of the presence of combustible dust. Class II locations include the following:

Class II, Division 1 - A Class II, Division 1 location is a location (a) in which combustible dust is or may be in suspension in the air under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures; or (b) where mechanical failure or abnormal operation of machinery or equipment might cause such explosive or ignitable mixtures to be produced, and might also provide a source of ignition through simultaneous failure of electric equipment, operation of protection devices, or from other causes, or (c) in which combustible dusts of an electrically conductive nature may be present.

NOTE: This classification may include areas where metal dusts and powders are produced or processed, and other similar locations that contain dust producing machinery and equipment (except where the equipment is dust-tight or vented to the outside).

- These areas would have combustible dust in the air, under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures.
- Dusts containing magnesium or aluminum are particularly hazardous and the use of extreme caution is necessary to avoid ignition and explosion.

Class II, Division 2 - A Class II, Division 2 location is a location in which: (a) combustible dust will not normally be in suspension in the air in quantities sufficient to produce explosive or ignitable mixtures, and dust

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accumulations are normally insufficient to interfere with the normal operation of electrical equipment or other apparatus; or (b) dust may be in suspension in the air as a result of infrequent malfunctioning of handling or processing equipment, and dust accumulations resulting from there may be ignitable by abnormal operation or failure of electrical equipment or other apparatus.

NOTE: This classification includes locations where dangerous concentrations of suspended dust would not be likely but where dust accumulations might form on or in the vicinity of electric equipment. These areas may contain equipment from which appreciable quantities of dust would escape under abnormal operating conditions or be adjacent to a Class II Division 1 location, as described above, into which an explosive or ignitable concentration of dust may be put into suspension under abnormal operating conditions.

Responsibilities

MANAGERS/SUPERVISOR

The EHS Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees will be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

Safe Work Practices

TOOLS AND PROTECTIVE EQUIPMENT

Insulating equipment designed for the voltage levels to be encountered shall be provided and employees shall be instructed to use the equipment. No person, firm, or corporation, or agent of same, shall require or permit any employee to perform any function in proximity to energized high-voltage lines; to enter upon any land, building, or other premises and there engage in any excavation, demolition, construction, repair, or other operation; or to erect, install, operate, or store in or

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upon such premises any tools, machinery, equipment, materials, or structures (including scaffolding, house moving, well drilling, pile driving, or hoisting equipment) unless and until danger from accidental contact with high-voltage lines has been effectively guarded against. Insulated equipment and/or PPE shall be visibly marked with the latest test date or the next required testing date.

Employees working in areas where there are potential electrical hazards must be provided with and use personal protective equipment (PPE) that is appropriate for the specific work that must be performed. The electrical tools and protective equipment that must be specifically approved, rated, and tested for level of voltage of which an employee may be exposed. Employees must only use appropriate tools for the job being performed. The Qualified Electrical Worker is responsible for determining appropriate levels of personal protective equipment and type of tools to use. Personal Protective Equipment must be selected to meet the criteria established by the American Society of Testing and Materials (ASTM) and by the America National Standards Institute (ANSI).

PPE must be maintained in a safe, reliable condition and be inspected for damage before each day's use and immediately following any incident that can reasonably be suspected of having caused damage. It is the responsibility of the Qualified Electrical Worker to inspect all PPE prior to using the PPE. The Qualified Electrical Worker must reject all PPE that does not pass the inspection. Company contracted employees must use insulated tools and handling equipment that are rated for the voltages to be encountered when working near exposed energized conductors or circuit. Tools and handling equipment should be replaced if the insulating capability is decreased due to damage. Protective gloves must be used when employees are working with exposed electrical parts above fifty (50) volts. Fuse handling equipment (insulated for circuit voltage) must be used to remove or install fuses when the fuse terminals are energized. Ropes and hand lines used near exposed energized parts must be non-conductive. The Qualified Electrical Worker is responsible for inspecting all PPE and insulated equipment prior to use. Any PPE or insulated equipment that does not pass an inspection is prohibited from being used.

Protective shields, barriers, or insulating materials must be used to protect each employee from shock, burns, or other electrical injuries while that person is working near exposed energized parts that might be accidentally contacted or where dangerous electric heating or arcing might occur.

Protective shields, barriers, or insulating materials must be used to protect each employee from shock, burns, or other electrical injuries while that person is working near exposed energized parts that might be accidentally contacted or where dangerous electric heating or arcing might occur.

PRECAUTIONS ABOUT ARCING AND FLASHES

Employees must wear appropriate personal protective equipment for the eyes or face wherever there is a potential danger of electric arcs or flashes or when there is a mechanical hazard that may cause eye damage. This must include ANSI or ASTM certified eye protection with side shields or a full-face shield. Employees must also wear any other appropriate personal protective equipment whenever there is a potential danger of electric arcs. This equipment may include appropriate gloves, boots, hearing protection, flame resistant clothing, and any other

personal protective equipment identified by NFPA 70E for the type of work being performed. The following scenarios are just a few of the examples of situation with the potential for arcs:

- Working with a metal or conductive tool near a live electrical contact point with voltages above 600 volts;
- Accidentally making contact across two live electrical contact points with a metal or conductive tool; and,
- Utilizing conductive materials or tools to connect a circuit in place of properly rated fuses or

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circuit breakers.

Precautions to prevent arcs or flashes include, but may not be limited to, the following:

- Keep covers over live electrical contact points closed;
- Avoid using metal or conductive tools around live electrical contact points, when possible;
- Avoid pointing or placing metal tools near live electrical contact points in equipment with voltages above 600 volts;
- Verify the voltages present when working near live electrical contact points;
- Utilize test fixture boxes while performing adjustments, calibrations, or function tests of energized parts; and
- Use properly rated fuses for the capacity of the line or protection needed for the equipment

INSPECTIONS

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter will be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.
- Faulty equipment, tools, or appliances will be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.
-

REPAIRS

- Only Qualified Personnel, who have been authorized by the department supervisor or manager, may make repairs to supply cords on electrical tools and to extension cords.
- The names of employees authorized to make repairs will be posted in the workplace.
- Only certified electricians will be allowed to make repairs to electrical equipment and wiring systems.
- The supervisor obtaining the services of a certified electrician is responsible to verify the electrician's credentials.
- Employees will not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.
- Employees will not wear conductive apparel such as rings, watches, jewelry, etc. (unless they are rendered non-conductive by covering, wrapping, or other insulating means) while working on or near open energized equipment this includes batteries on trucks, forklifts, phone backup systems or other such equipment.
- If employees are subject to handle long dimensional conductor objects (ducts or pipes), steps for safe work practices will be employed to ensure the safety of workers.

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EXTENSION CORDS

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug and the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3-wire, grounded outlet, unless powering insulated tools.
- Adapters that allow 3-wire, grounded prongs, connected to 2-wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - All extension cords will be plugged into one of the following:
 - A GFCI outlet.
 - A GFCI built into the cord.
 - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords will be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord will be removed from service and repaired or replaced.
- Extension cords will not be used on compressor skid to operate heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment will be hard wired per applicable electrical codes.

OUTLETS

- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

MULTIPLE OUTLET BOXES

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

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DOUBLE INSULATED TOOLS

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a 3-wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

SWITCHES, CIRCUIT BREAKERS, AND DISCONNECTS

- All electrical equipment and tools must have an on/off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labelled with the voltage rating.
- Each breaker within a breaker panel must be labelled for the service it provides.
- Disconnect switches providing power for individual equipment must be labelled accordingly.

LADDERS

- Only approved, non-conductive ladders may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.
- Wood ladders should not be painted, which can hide defects, except with clear lacquer.
- When using ladders, they will be free from any moisture, oils, and greases.

ENERGIZED AND OVERHEAD HIGH VOLTAGE POWER LINES & EQUIPMENT

Post and maintain in plain view of the operator and driver on each crane, derrick, power shovel, drilling rig, hay loader, hay stacker, pile driver, or similar apparatus, a durable warning sign legible at 12 feet reading: "Unlawful To Operate This Equipment Within 20 Feet Of High-Voltage Lines of 50,000 Volts Or Less." The erection, operation or dismantling of any boom-type lifting or hoisting equipment, or any part thereof, closer than the minimum clearances from energized overhead high-voltage lines set forth shall be prohibited.

- A minimum clearance of 20 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines will be de-energized and grounded or other protective measures will be provided before work is started.
- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.
- Minimum approach distance for qualified employees will be followed per 29 CFR 1910.333(c)(3)(i) (Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current).

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CONFINED OR ENCLOSED WORK SPACES

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee will isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary will be provided.

ENCLOSURES, BREAKER PANELS, AND DISTRIBUTION ROOMS

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures will be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have “Danger: High Voltage – Authorized Personnel Only” posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (boxes, rags, cleaning fluids, etc.)

LOCK OUT/TAG OUT

- No work will be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been de-energized, the circuits energizing the parts will be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out will be treated as live parts.
- Per Company policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using Company’s Control of Hazardous Energy – Lock Out/Tag Out Program. Lockouts are performed by the EH&S Officer, Shop Foreman or Branch Manager. Designated employees in some branches may be trained by local management to lock out equipment. If live sources are to be worked on, it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.
- Authorized personnel will be trained in lock out/tag out procedures.
- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow Company’s Control of Hazardous Energy – Lock out/Tag Out Program.

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- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

CONTRACTORS

- Only approved, certified, electrical contractors may perform construction and service work on Company or client property.
- It is the Managers/Supervisors responsibility to verify the contractor's certification.

FIRE EXTINGUISHERS

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water-type extinguishers will not be located closer than 50 feet from electrical equipment.

ELECTRIC SHOCK-CPR:

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

ELECTRIC WELDERS

- A disconnecting means will be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.
- A switch or circuit breaker will be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

EQUIPMENT GROUNDING

- All gas compressors, air compressors, separators, vessels, etc. will be grounded by means of using a lug and ground strap, nominal in size to a 1/2" bolt or larger, attached to a ground rod six feet or longer.
- Equipment bonding jumpers will be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100°F or less will have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

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ASSURED GROUNDING

OSHA requires that employers will use either ground fault circuit interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

- Company will use GFCI's in lieu of an assured grounding program.

GROUND FAULT CIRCUIT INTERRUPTERS

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, will have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords will use a GFCI.
- Additionally, approved GFCI's will be used for 240-Volt circuits in the same service as described above.
- GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

Training

All regular full time and temporary employees will be trained in Electrical Safety utilizing the Company Electrical Safety Training course or an approved equivalent.

Employees who face a risk of electric shock, but who are not qualified persons, will be trained and familiar with electrically related safety practices.

Employee will be trained in safety related work practices that pertain to their respective job assignments. Employees will be trained on clearance distances.

Safe work practices will be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

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Purpose

The purpose of this program is to prevent injuries due to electrical exposure to low voltage (less than or equal to 600 volts) for employees and contractors when working in California.

Scope

This program is applicable at every California work area where low voltage electrical exposure may occur. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Purpose

The purpose of this program is to set forth procedures for the safe use of low voltage electrical equipment, tools, and appliances at the Company.

Responsibilities

MANAGERS/SUPERVISOR

The Safety Manager will develop electrical safety programs and procedures in accordance with CAL/OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

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General Requirements for Low Voltage Systems

- Only qualified persons may work on electrical equipment or systems. Only qualified persons shall work on electrical equipment or systems. Only qualified persons shall be permitted to perform any function in proximity to energized overhead conductors unless means to prevent accidental contact have been provided.
- Maintenance of electrical installations is required to ensure their safe condition.
- Electrical equipment and wiring must be protected from mechanical damage and environmental deterioration.

USE OF BARRIERS OR BARRICADES

Covers or barriers must be installed on boxes, fittings and enclosures to prevent accidental contact with live parts. Suitable temporary barriers or barricades shall be installed when access to opened enclosures containing exposed energized equipment is not under the control of an authorized person. Energized parts of electric equipment operating at 50 volts or more shall be guarded against accidental contact by use of approved cabinets or other forms of approved enclosures or by any of the following means:

- By location in a room, vault or similar enclosure that is accessible only to qualified persons.
- By suitable permanent, substantial partitions or screens so arranged that only qualified persons will have access to the space within reach of the energized parts. Any openings in such partitions or screens shall be so sized and located that persons are not likely to come into accidental contact with the energized parts or to bring conducting objects into contact with them.
- By location on a suitable balcony, gallery or platform so elevated and otherwise located as to prevent access by unqualified persons; or
- By elevation of 8.0 feet (2.44 m) or more above the floor or other working surface.

In locations where electric equipment is likely to be exposed to physical damage, enclosures or guards shall be so arranged and of such strength as to prevent such damage. Entrances to rooms and other guarded locations containing exposed live parts shall be marked with conspicuous warning signs forbidding unqualified persons to enter.

Use of barriers or barricades at access points - Suitable temporary barriers, or barricades shall be installed when access to opened enclosures containing exposed energized equipment is not under the control of an authorized person.

Reinstalling barriers or covers after work is completed - The authorized person shall be responsible for removing from the work area any temporary personnel protective equipment and reinstalling all permanent barriers or covers.

PROCEDURES USED PRIOR TO WORK BEING PERFORMED ON EXPOSED ENERGIZED PARTS OF EQUIPMENT OR SYSTEMS

Work shall not be performed on exposed energized parts of equipment or systems until the following conditions are met:

- Responsible supervision has determined that the work is to be performed while the equipment or

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systems are energized.

- Involved personnel have received instructions on the work techniques and hazards involved in working on energized equipment.
- Suitable personal protective equipment and safe guards (i.e., approved insulated gloves or insulated tools) are provided and used.

Conductive measuring tapes, ropes or similar measuring devices and conductive fish tapes shall not be used when working on or near exposed energized conductors or parts of equipment. Conductive fish tapes shall not be used in raceways entering enclosures containing exposed energized parts unless such parts are isolated by suitable barriers.

LOCK OUT/TAG OUT PROCEDURES ARE USED

- While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been de-energized, the circuits energizing the parts shall be locked out or tagged or both. Locking and tagging will be accomplished before work is started.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
- All electrical equipment and systems shall be treated as energized. All electrical equipment and systems shall be treated as energized until tested or otherwise proven to be de-energized.
- Per Company policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using Company's Control of Hazardous Energy – Lock Out/Tag Out Program. Lockouts are performed by the EHS Manager, Shop Foreman or Branch Manager. Designated employees in some branches may be trained by local management to lock out equipment. If live sources are to be worked it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.
- Authorized Person duties after the required work on an energized system or equipment - The authorized person shall be responsible for removing from the work area any temporary personnel protective equipment and reinstalling all permanent barriers or covers.
- Authorized personnel will be trained in lock out/tag out procedures.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

INSPECTIONS

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.
- Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

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REPAIRS

- Only Qualified Personnel, who have been authorized by the department supervisor or manager, may make repairs to supply cords on electrical tools and to extension cords.
- The names of employees authorized to make repairs will be posted in the workplace.
- Only certified electricians shall be allowed to make repairs to electrical equipment and wiring systems.
- The supervisor obtaining the services of a certified electrician is responsible to verify the electrician's credentials.
- Employees shall not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.
- Employees shall not wear conductive apparel such as rings, watches, jewelry, etc. (unless they are rendered non-conductive by covering, wrapping, or other insulating means) while working on or near open energized equipment this includes batteries on trucks, forklifts, phone backup systems or other such equipment.
- If employees are subject to handle long dimensional conductor objects (ducts or pipes), steps for safe work practices shall be employed to ensure the safety of workers.

EXTENSION CORDS

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - o All extension cords shall be plugged into one of the following:
 - o A GFCI outlet;
 - o A GFCI built into the cord;
 - o A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be remove from service and repaired or replaced.
- Extension cords shall not be used on compressor skid to operated heat tapes or any other type

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of equipment on a temporary basis. Heat tapes or other equipment shall be hard wired per applicable electrical codes.

OUTLETS

- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.
- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

DOUBLE INSULATED TOOLS

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

LADDERS

- Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.
- Wood ladders should not be painted, which can hide defects, except with clear lacquer.
- When using ladders they shall be free from any moisture, oils, and greases.

CONFINED OR ENCLOSED WORK SPACES

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee shall isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

SWITCHES, CIRCUIT BREAKERS AND DISCONNECTS

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labeled with the voltage rating.
- Each breaker within a breaker panel must be labeled for the service it provides.
- Disconnect switches providing power for individual equipment must be labeled accordingly.

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ENCLOSURES, BREAKER PANELS, AND DISTRIBUTION ROOMS

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures shall be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have “Danger: High Voltage – Authorized Personnel Only” posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

CONTRACTORS

- Only approved, certified, electrical contractors may perform construction and service work on Company or client property.
- It is the Manager/Supervisors responsibility to verify the contractor’s certification.

FIRE EXTINGUISHERS

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

ELECTRIC WELDERS

- A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.
- A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

EQUIPMENT GROUNDING

- All gas compressors, air compressors, separators, vessels, etc. shall be grounded by means of using a lug and ground strap, nominal in size to a ½” bolt or larger, attached to a ground rod six feet or longer.
- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a

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ground rod placed in the ground.

GROUND FAULT CIRCUIT INTERRUPTERS

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords shall use a GFCI.
- Additionally, approved GFCI's shall be used for 240-Volt circuits in the same service as described above.
- GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

Training

All regular full time and temporary employees will be trained in low voltage electrical safety requirements and the training shall be documented.

Safe work practices shall be employed to prevent electric shock or other injuries resulting for either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

ELECTRIC SHOCK-CPR

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

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Purpose

The purpose of this program is to assure a safe work environment during welding, cutting and hot work operations in California. Gas welding, cutting and heating shall be conducted in accordance with Cal/OSHA California Code of Regulations, Title 8.

Scope

This program is applicable to all Company employees directly involved or assisting in the welding, cutting and hot work operations in California.

Key Responsibilities

MANAGERS AND SUPERVISORS

- Determine if its property is safe for welding and cutting operations.
- Establish safe areas for welding and cutting operations.
- Provide training for all employees whose task includes heat, spark or flame producing operations such as welding, brazing, or grinding.
- Develop and monitor effective hot work procedures.
- Provide safe equipment for hot work.
- Provide proper and effective PPE for all hot work.
- Monitor all hot work operations.
- Ensure all hot work equipment and PPE are in safe working order.
- Allow only trained and authorized employees to conduct hot work and conduct inspections of the hot work area before operations begin.

EMPLOYEES

- Follow all hot work procedures.
- Properly use appropriate hot work PPE.
- Inspect all hot work equipment before use.
- Report any equipment problems or unsafe conditions.

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Procedure

GENERAL

Rules and instructions covering the operation and maintenance of fuel-gas supply equipment are readily available. Rules and instructions covering the operation and maintenance of oxygen or fuel-gas supply equipment including generators, and oxygen or fuel-gas distribution piping systems shall be readily available.

Cutting or welding shall not be permitted in the following situations:

- In areas not authorized by management.
- In sprinkled buildings while such protection is impaired.
- In the presence of potentially explosive atmospheres, e.g. flammables.
- In areas near the storage of large quantities of exposed, readily ignitable materials.
- In areas where there is dust accumulation of greater than 1/16 inch within 35 feet of the area where welding/hot work will be conducted.
- All dust accumulation shall be cleaned up before welding or hot work is permitted.

Employees in charge of the oxygen or fuel-gas supply equipment shall be instructed for this work before the work begins. Employees in charge of the oxygen or fuel-gas supply equipment including generators, and oxygen or fuel- gas distribution piping systems shall be instructed for this work before being left in charge.

Back flow protection shall be provided by an approved device that will prevent oxygen from flowing into the fuel- gas system or fuel from flowing into the oxygen system.

An approved device that will prevent flame from passing into the fuel-gas system shall provide flashback protection.

An approved pressure-relief device set at the appropriate pressure shall provide backpressure protection.

Only approved apparatuses such as torches, regulators or pressure-reducing valves, setting generators and manifolds shall be used.

Use of "cracking" when connecting regulators to cylinder valves - Before connecting a regulator to a cylinder valve, the valve shall be opened slightly and closed immediately. (This action is generally termed "cracking" and is intended to clear the valve of dust or dirt that might otherwise enter the regulator.) The valve shall be opened while standing to one side of the outlet; never in front of it. A fuel-gas cylinder valve shall never be opened up, cracked near other welding work or near sparks, flame, or other possible sources of ignition.

All hoses and hose connections shall comply with the Compressed Gas Association and Rubber Manufacturers' Associations' applicable standards.

FIRE PREVENTION

Fire extinguishers or fire suppression systems are available during welding operations. COMPANY will ensure fire prevention and suppression procedure shall be established whenever any welding and cutting operations are taking place.

Whenever welding or cutting is performed in locations where other than a minor fire might develop or any of the conditions

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mentioned above cannot be met, a fire watch shall be provided.

- The fire watch shall be provided during and for a minimum of 1/2 hour past the completion of the welding project.
- The fire watch shall be trained in the use of fire extinguishers and the facility's alarm system.
- During this time the fire watch will have appropriate fire extinguishers readily available.
- Suitable extinguishers shall be provided and maintained ready for instant use.
- A hot-work permit will be issued on all welding or cutting outside of the designated welding area.

A hot work permit must be completed before performing hot work. Precautions that are to be taken shall be in the form of a written permit. Before cutting or welding is permitted the area shall be inspected and a written permit shall be used to authorize welding and cutting operations.

Where practicable all combustibles shall be relocated at least 35 feet from the work site. Where relocation is impractical, combustibles shall be protected with flameproof covers, shielded with metal, guards, curtains, or wet down the material to help prevent ignition of material.

Ducts, conveyor systems, and augers that might carry sparks to distant combustibles shall be protected or shut down. Where cutting or welding is done near walls, partitions, ceilings, or openings in the floor (grating, manholes, etc.), fire-resistant shields or guards shall be provided to prevent ignition.

If welding is to be done on a metal wall, partition, ceiling, or solid decking/flooring, precautions shall be taken to prevent ignition of combustibles on the other side, due to conduction or radiation of heat. Where combustibles cannot be relocated on the opposite side of the work, a fire watch person shall be provided on the opposite side of the work.

Cutting or welding on pipes or other metal in contact with combustible walls, partitions, floors, ceilings, or roofs shall not be undertaken if the work is close enough to cause ignition by combustion.

A designated welding area shall be established to meet the following requirements:

- Floors swept and cleaned of combustibles within 35 feet of work area.
- Flammable and combustible liquids and material will be kept 35 feet from work area.
- Adequate ventilation providing 20 air changes per hour.
- At least one 10 pound dry chemical fire extinguisher shall be within access of 35 feet of the work area.
- Protective dividers such as welding curtains or noncombustible walls will be provided to contain sparks and slag to the combustible free area.

Requirements for welding conducted outside the designated welding area:

- Portable welding curtains or shields must be used to protect other workers in the welding area.
- A hot-work permit must be completed and complied with prior to initiating welding operations.
- Respiratory protection is mandatory unless an adequate monitored airflow away from the welder and others present can be established and maintained.
- Plastic materials must be covered with welding tarps during welding procedures.
- Fire watch must be provided for all hot-work operations.

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After welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.

CONFINED SPACE WORK

A confined space is:

- A space that is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous occupancy.

Refer to Confined Space Program for COMPANY before commencing any welding, cutting, and/or brazing operations in an area meeting the requirements of a confined space.

Ventilation is a prerequisite to work in confined spaces.

Compressed gas cylinders are not taken into a confined space. Cylinders containing oxygen or acetylene or other fuel or gas shall not be taken into confined spaces.

FUMES, GASES AND DUST

Fumes produced by some welding processes can be toxic and may require source extraction. An assessment of the work to be performed must be completed before each job is undertaken. Fumes generally contain particles from the material being welded. Welding fumes can have an acute effect on the respiratory system.

All welding and cutting operations shall be adequately ventilated to prevent the accumulation of toxic materials. This applies not only to the welder, but also to helpers and other personnel in the immediate vicinity.

Use of Ventilation or Respirators During Welding Operations - Any welding, cutting or burning of lead base metals, zinc, cadmium, mercury, beryllium or exotic metals or paints not listed here shall have proper ventilation or respiratory protection. Refer to California Division of Occupational Safety and Health – Title 8 Regulations Subchapter 4, Construction Safety Orders, Article 4 - Dusts, Fumes, Mists, Vapors, and Gases for a complete list

Welders and helpers will refer to the Respiratory Protection Program for COMPANY to determine the appropriate respiratory protection to be used during welding operations.

PERSONAL PROTECTION

Helmets and hand shields shall be made of a material, which is an insulator for heat and electricity. Helmets, shields, and goggles shall not be readily flammable and shall be capable of withstanding sterilization.

Helmets and hand shields shall be arranged to protect the face, neck and ears from direct radiant energy from the arc.

Helmets shall be provided with filter plates and cover plates designed for easy removal.

All parts shall be constructed of a material, which will not readily corrode or discolor the skin. Goggles shall

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be ventilated to prevent fogging of the lenses as much as practicable.

All glass for lenses shall be tempered, substantially free from scratches, air bubbles, waves and other flaws. Except when a lens is ground to provide proper optical vision correction, the front and rear surfaces of lenses and windows shall be smooth and parallel.

Lenses shall bear some permanent distinctive marking which may readily identify the source and shade and be appropriate shade number for the application of work.

Adequate hand protection and clothing must be used to protect the body from welding hazards.

CLEANING COMPOUNDS

In the use of cleaning materials, because of their possible toxicity or flammability, appropriate precautions such as manufacturer instructions shall be followed.

Degreasing and other cleaning operations involving chlorinated hydrocarbons shall be so located that no vapors from these operations will reach or be drawn into the atmosphere surrounding any welding operation. In addition, trichloroethylene and perchloroethylene shall be kept out of atmospheres penetrated by the ultraviolet radiation of gas-shielded welding operations.

SAFE HANDLING OF COMPRESSED GASES

Compressed gas cylinders shall be DOT-approved and legibly marked near the shoulder of the cylinder for the purpose of identifying the gas content with either the chemical or trade name of the gas.

All compressed gas cylinder connections must comply with ANSI B57. 1-1965 Standards.

Welding fuel-gas cylinders shall be placed with valve end up whenever they are in use. Liquefied gases shall be stored and shipped with the valve end up.

All cylinders shall be kept away from sources of heat and from radiators and piping systems that may be used for grounding purposes.

Cylinders and cylinder valves including couplings and regulators shall be kept free from oily or greasy substances and must not be handled with gloves or rags in the same condition.

Cylinders shall be handled carefully. Note: Rough handling, knocks and falls are liable to damage the cylinder, valve or safety devices and result in leakage.

Stored oxygen cylinders shall be kept at least 20 feet from the fuel gas cylinders or combustible materials, especially oil or grease, or separated by a non-combustible barrier at least 5 feet high with a fire rating of at least one-half hour. All empty cylinders shall have closed valves. Valve protection caps shall always be in place and hand-tight except when cylinders are in use or connected for use.

Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards.

Tagging of Defective Cylinders - Cylinders having leaking fuse plugs or other leaking safety devices shall be plainly tagged, and the supplier shall be promptly notified of the condition and his instructions followed. A warning shall be placed near the cylinders prohibiting any approach to them with a lighted cigarette or other source of ignition.

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Assigned storage spaces shall be located where cylinders cannot be knocked over or damaged by falling objects or subject to tampering by unauthorized persons.

Special care must be taken when transporting gas cylinders:

- Cylinders must be secured with valve cap installed.
- Cylinders shall not be lifted by the valve protection caps, the regulators must be removed and cylinders shall not be dropped or permitted to strike each other.
- Removed regulators must be carried in the cab of the vehicle.
- Cylinders shall not be tampered with nor should any attempt be made to repair them.

FIRST AID EQUIPMENT

First aid equipment shall be available at all times. All injuries shall be reported as soon as possible for medical attention. First aid shall be rendered until medical attention can be provided.

Training Employees on Fuel-Gas Systems

Employees in charge of the oxygen or fuel-gas supply equipment including generators, and oxygen or fuel-gas distribution piping systems shall be instructed for this work before being left in charge. Training shall include:

- Position Responsibilities
- Cutters, welders and their supervisors must be suitably trained in the safe operations of their equipment and the safe use of the process.
- Fire Watch Responsibilities - specifically, the fire watch must know:
 - o That their ONLY duty is Fire Watch.
 - o When they can terminate the watch.
 - o How to use the provided fire extinguisher(s).
 - o Be familiar with facilities and how to activate fire alarm, if fire is beyond the incipient stage.
 - o Operator Responsibilities
 - o Contractor Responsibilities
 - o Documentation requirements
 - o Respirator Usage requirements
 - o Fire Extinguisher training.

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RESPONSIBILITY

The Injury and Illness Prevention Program (IIP Program) administrator, who is the Company EHS Manager, has the authority, responsibility and overall accountability for implementing the provisions of this program for the Company.

All managers and supervisors are responsible for implementing and maintaining the IIP Program in their work areas and for answering worker questions about the IIP Program. A copy of this IIP Program is available from each manager and supervisor.

COMPLIANCE

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly. All employees will comply with safe and healthy work practices by incentives, training, re- training programs and disciplinary programs. Our systems of ensuring that all employees complies with the rules and maintain a safe work environment include:

- Informing employees of the provisions of our IIP Program.
- Evaluating the safety performance of all employees.
- Recognizing employees who perform safe and healthful work practices.
- Providing training to employees whose safety performance is deficient.
- Disciplining employees for failure to comply with safe and healthful work practices.

COMMUNICATION

We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of one or more of the following checked items:

- New employee orientation including a discussion of safety and health policies and procedures.
- Review of our IIP Program, workplace safety and health training programs.
- Regularly scheduled safety meetings.
- Effective communication of safety and health concerns between employees and supervisors, including translation where appropriate.

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- Posted or distributed safety information.
- A system for employees to report safety and health hazards/problems effectively and anonymously without fear of reprisal or reprimand.
- Where required, a labor/management safety and health committee that meets regularly, prepares written records of the safety and health committee meetings, reviews results of the periodic scheduled inspections, reviews investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents, reviews investigations of alleged hazardous conditions, and submits recommendations to assist in the evaluation of employee safety suggestions.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by the following competent observer(s) in the following areas of our workplace:

Inspector	Inspection	Location	Frequency
Project Mgr or Safety Representative	Safety Review	Project Site	Daily
Safety Group / Committee	Safety Evaluation	Project Site	As Needed

Periodic inspections are performed according to the following schedule:

- When new substances, processes, procedures, or, equipment which present potential new hazards are introduced into our workplace.
- When new, previously unidentified hazards are recognized.
- When occupational injuries and illnesses occur.
- When we hire and/or reassign permanent or intermittent employees to processes, operations, or tasks for which a hazard evaluation has not been previously conducted.
- Whenever workplace conditions warrant an inspection. Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable documentation and any other effective methods to identify and evaluate workplace hazards.

ACCIDENT/EXPOSURE INVESTIGATIONS

Procedures for investigating workplace accidents and hazardous substance exposures include:

- Visiting the accident scene as soon as possible.

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- Interviewing injured workers and witnesses.
- Examining the workplace for factors associated with the accident/exposure.
- Determining the cause of the accident/exposure.
- Taking corrective action to prevent the accident/exposure from recurring.
- Recording the findings and corrective actions taken.

TRAINING AND INSTRUCTION

All employees, including managers and supervisors, shall have training and instruction on general and job-specific safety and health practices provided prior to or at the time of initial job assignment. Training and instruction shall be provided as follows:

- When the IIP Program is first established.
- To all new employees, except for those in construction who are provided training through a Cal/OSHA approved construction industry occupational safety and health training program.
- To all employees given new job assignments for which training has not been previously provided.
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard.
- Whenever the employer is made aware of a new or previously unrecognized hazard.
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed.
- To all employees with respect to hazards specific to each employee's job assignment.
- Workplace safety and health training practices for all industries include, but are not limited to, the following:
 - o Explanation of the employer's IIP Program, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices and injuries.
 - o Use of appropriate clothing including gloves, footwear, and personal protective equipment.
 - o Information about chemical hazards to which employees could be exposed and other hazard communication program information.
 - o Availability of toilet, hand-washing and drinking water facilities.
 - o Provisions for medical services and first aid including emergency procedures. In addition, we provide specific instructions to all employees regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

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RECORDKEEPING

We have taken the following steps to implement and maintain our IIP Program:

- Records of hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment and correction form.
- Documentation of safety and health training for each employee, including the employee's name or other identifier, training dates, type(s) of training, and training providers are recorded on an employee training and instruction form.
- We also include the records relating to employee training provided by a construction industry occupational safety and health training program approved by Cal/OSHA.
- Inspection records and training documentation will be maintained according to the following checked schedule:
 - o For one year, except for training records of employees who have worked for less than one year which are provided to the employee upon termination of employment.

HAZARD CORRECTION

Unsafe or unhealthy work circumstances, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- When observed or discovered.
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition.
- Workers necessary to correct the hazardous condition shall be provided with the necessary protection.
- All such actions taken and dates they are completed shall be documented on the appropriate forms.

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Purpose

The purpose of this training program is to ensure a safe and incident free lifting operation in accordance with Cal/OSHA California Code of Regulations, Title 8, Section 5043.

Scope

When work is performed in California on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

- Management shall determine if this program is required for regulatory compliance within his/her region.
- Management shall select a training facility or use an in-house qualified trainer to supply and document the training.
- The supervisor shall verify that each of their employees have the proper training before being involved in rigging operations.
- Only qualified and trained personnel can attach or detach lifting equipment to loads or lifting loads.
- Employees shall follow the requirements of this procedure.

Procedure

GENERAL

Only "qualified riggers" are allowed to attach any loads to a lifting hook and only "qualified operators" are allowed to operate a crane while engaged in lifting operations.

RIGGING REQUIREMENTS

- Pre-Use Inspection of Rigging Equipment - Each day before being used, the sling and all fastenings and attachments shall be inspected for damage or defects by a qualified person. Additional inspections shall be performed during sling use, where service conditions warrant. Damaged or defective slings shall be

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immediately removed from service.

- Defective rigging must be removed from service. Slings and hooks that are damaged or defective shall not be used. Defective slings should be removed from use and destroyed.
- Slings are not shortened. Chain or wire rope slings shall not be shortened with knots or bolts or other makeshift devices. Slings shall not be kinked or knotted.
- The safe working load is marked on rigging equipment. Slings and shackles shall have permanently affixed and legible identification markings, as prescribed by the manufacturer, that indicate the recommended safe working load.

SAFE USE OF RIGGING

- Examples of safe practices include slings and shackles shall not be loaded in excess of their rated capacities as prescribed by the sling manufacturer on the identification markings permanently affixed to the sling. Slings used in a basket hitch shall have the loads balanced to prevent slippage. Slings shall be padded or protected from the sharp edges of their loads. Hands or fingers shall not be placed between the sling and its load while the sling is being tightened around the load. A sling shall not be pulled from under a load when the load is resting on the sling and damage to the sling may result. Slings shall be set to avoid slippage.
- Suspended loads are not lifted over workers. Suspended loads shall be kept clear of all obstructions. All employees shall be kept clear of loads about to be lifted and of suspended loads.
- Hands or fingers shall not be placed between the sling and its load while the sling is being tightened around the load.
- Shock loading is prohibited. Whenever any sling is used, shock loading is prohibited.
- Deformed hooks or rings shall be replaced or repaired and reshaped under proper metallurgical control and proof tested.
- Rigging is used and/or maintained in accordance with manufacturer's recommendations. Rigging must be used and maintained in accordance with manufacturer's recommendations. Hooks and shackles shall only be used in a manner recommended by the manufacturer. Proof coil steel chain, also known as common or hardware chain, or other chain not recommended for slinging or hoisting by the manufacturer, shall not be used for hoisting purposes. Wrought iron chains in constant use shall be annealed or normalized at intervals not exceeding 6 months when recommended by the manufacturer. The chain manufacturer shall be consulted for recommended procedures for annealing or normalizing. Alloy chains shall not be annealed. Deformed hooks or rings shall be replaced or repaired and reshaped under proper metallurgical control and proof tested. Company shall follow proper annealing or normalizing procedures done only in accordance with the chain manufacturer's specifications.
- All hooks for which no applicable manufacturer's recommendations are available shall be tested to twice the intended safe working load before they are initially put into use.
- Proof Testing of Rigging Equipment - Special custom design grabs, hooks, clamps or other lifting accessories for such units as modular panels, prefabricated structures and similar materials, shall be marked to indicate the safe working loads and shall be proof-tested to 125 percent of the rated load prior to use.

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- Tag lines shall be used unless their use creates an unsafe condition.

Training

Company employees shall display their competency in the following topics:

- The selection of proper hardware (eye bolts, shackles, hooks, wire rope products, synthetic slings, chain slings, etc.) for the correct application (weight, hitches, angles, temperatures, center of gravity, etc.).
- The inspection of the selected hardware before, during and after the lift.
- The proper methods of securing the load, attaching the load to the hook, lifting the load, handling of the load during the movement of the load and lowering and placement of load.
- The proper storage of the rigging equipment.

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Purpose

The purpose of this program is to prevent injuries due to falls from elevated work areas and ensure employees and contractors are able to inspect scaffolding materials and erected scaffolds when working in California.

Scope

This program is applicable at every California work area where scaffolding is erected. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Bearer - A horizontal member of a scaffold upon which the platform rests and which may be supported by ledgers.

Brace - A tie that holds one scaffold member in a fixed position with respect to another member.

Coupler - A tie that holds one scaffold member in a fixed position with respect to another member.

Double pole or independent pole scaffold - A scaffold supported from the base by a double row of uprights, independent of support from the walls and constructed of uprights, ledgers, horizontal platform bearers, and diagonal bracing.

Guardrail - A rail secured to uprights and erected along the exposed sides and ends of platforms.

Heavy Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 75 pounds per square foot.

Ledger (stringer) - A horizontal scaffold member which extends from post to post and which supports the putlogs or bearer forming a tie between the posts.

Light Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 25 pounds per square foot.

Manually Propelled Mobile Scaffold - Manually propelled mobile scaffold.

Maximum intended load - The total of all loads including the working load, the weight of the scaffold, and such other loads as may be reasonably anticipated.

Medium duty scaffold - A scaffold designed and constructed to carry a working load not to exceed 50 pounds per square foot.

Mid-Rail - A rail approximately midway between the guardrail and platform, used when required, and secured to the uprights erected along the exposed sides and ends of platforms.

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Putlog - A scaffold member upon which the platform rests.

Runner - The lengthwise horizontal bracing or bearing members or both.

Scaffold - Any temporary elevated platform and its supporting structure used for supporting workmen or materials or both.

Toe board - A barrier secured along the sides and ends of a platform, to guard against the falling of material.

Tube and coupler scaffold - An assembly consisting of tubing, which serves as posts, bearers, braces, ties, and runners, a base supporting the posts, and special couplers which serve to connect the uprights and to join the various members.

Tubular welded frame scaffold - A sectional, panel, or frame metal scaffold substantially built up of prefabricated welded sections that consist of posts and horizontal bearer with intermediate members. Panels or frames shall be braced with diagonal or cross braces.

Working Load - Load imposed by men, materials, and equipment.

Key Responsibilities

Managers and Supervisors

- Responsible for ensuring that scaffolds are erected by a qualified person, that set up inspections are performed, and all daily inspections are performed before work starts for the day.
- Responsible for ensuring that all employees, and/or contractors have been trained in the use and inspection methods for scaffolds.
- Responsible for ensuring that all employees and contractors are aware that if an inspection discovers a defect, the scaffold cannot be used until repairs are made.

Employees

- Responsible for following this program by inspecting the scaffolds daily and report any damages or repairs that may be needed to their supervisor.

Procedure

General Requirements

The erection and dismantling of scaffolds shall be performed under the supervision and direction of a qualified person.

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The platform height shall not exceed 3 times the smallest dimension of the base. The maximum work level height shall not exceed 3 times the least base dimension below the platform. Where the basic mobile unit does not meet this requirement, outrigger frames shall be employed to achieve this least base dimension or provisions shall be made to guy or brace the unit against tipping.

Wood scaffold planks must be cross-supported every 8 feet. Scaffold deck boards shall be cleated, wired or nailed into place.

All working levels of scaffolds will be floored completely except where internal ladders require space for ladder openings.

Wheels or casters shall be properly designed for strength and dimensions to support 4 (four) times the design working load and all scaffold wheels, casters and swivels shall be provided with a positive locking device or other effective means to prevent movement of the scaffold.

Scaffolds and other devices mentioned or described in this program shall be maintained in a safe condition. Scaffolds shall not be altered or moved horizontally while they are occupied.

Any scaffold damaged or weakened from any cause shall be immediately repaired and shall not be used until repairs have been completed.

Guardrail requirements for all scaffolds meeting or exceeding work levels of 30 inches shall be in place. All scaffold work levels 30 inches or higher above the ground or floor shall have guardrail protection that meets the requirements of Section 3209 and 3210. Those requirements include:

- A standard guardrail shall consist of top rail, midrail, or equivalent protection, and posts, and shall have a vertical height within the range of 42 inches to 45 inches from the upper surface of the top rail to the floor, platform, runway, or ramp level.
- All guardrails and other permissible types, including their connections and anchorage, shall be designed for a live load of 20 pounds per linear foot applied either horizontally or vertically downward at the top rail.
- The following are some acceptable guardrail specifications. Other combinations will be accepted as long as equivalent strength and protection are maintained.
 - o In wooden construction, the posts to be of at least 2-inch by 4-inch nominal material spaced not to exceed 6 feet, the top rails to be smooth with corners rounded and not less than 2-inch by 4-inch nominal material. The posts may be spaced on 8-foot centers if the top rails consist of double 1-inch by 4-inch nominal boards, provided that 1 board is fastened in a flat position on top of the posts and the other is fastened in an edge-up position to the inside of the posts and the side of the top board. Single midrails, where permitted, shall be not less than 2-inch by 4-inch nominal material and installed on the contact side of the guardrail.
 - o If constructed of standard metal pipe, the top rails and single midrail, where permitted, to be 1 1/2-inch outside diameter or larger. The posts to be 1 1/2-inch outside diameter or larger, the spacing not to exceed 8 feet.
 - o If constructed of structural metal, the top rails to be angle iron of at least 2-inch by 2-inch by 1/4-inch angles or other metal shapes of equivalent bending strength; and the single midrail, where permitted, to be iron or steel of at least 2-inch by 2-inch by 1/4-inch angles or other metal shapes of equivalent strength. The posts to be angle iron of at least 2-inch by 2-inch by 1/4-inch stock, the spacing not to exceed 8 feet.
- Where toe boards are required, they shall be constructed of wood, concrete, metal, or other suitable

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material. Where constructed of metal grille, mesh shall not exceed 1-inch. The top of the toe board shall be not less than 3 1/2 inches above the platform, walkway, or other working level and the bottom clearance shall not exceed 1/4-inch.

- Buildings - Guardrails shall be provided on all open sides of unenclosed elevated work locations, such as: roof openings, open and glazed sides of landings, balconies or porches, platforms, runways, ramps, or working levels more than 30 inches above the floor, ground, or other working areas of a building

All platforms shall be overlapped (minimum 12 inches) and secured from any movement. An access ladder or equivalent safe access shall be provided.

Wood platforms shall not be covered with opaque finishes, except that platform edges may be covered or marked for identification. Platforms may be coated periodically with wood preservatives, fire-retardant finishes, and slip-resistant finishes; however, the coating may not obscure the top or bottom wood surfaces.

Scaffold planks shall extend over their end supports not less than 6 inches or more than 18 inches.

The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose boards shall not be used to support scaffolds or planks.

The poles, legs, or uprights of scaffolds shall be plumb, and securely and rigidly braced to prevent swaying and displacement. The criteria for leveling of the work platform by means of screw jacks or similar methods dictates that where leveling of the elevated work platform is required, screw jacks or other similar means for adjusting the height shall be provided in the base section of each mobile unit. The screw jack shall extend into its leg tube at least 1/3 its length, but in but in no case shall the exposed portion of the screw jack exceed 12 inches.

Materials being hoisted onto a scaffold shall have a tag line. Workers on scaffolds who are exposed to overhead hazards shall be provided with overhead protection or other means that will effectively eliminate the hazard.

Overhead protection shall be provided for workers on a scaffold exposed to overhead hazards.

Toe boards and guardrails shall be installed if any scaffold meets or exceeds work levels of 6 feet. All scaffold work levels 6 feet or higher above the ground or floor shall have a toe board at locations where persons are required to work or pass under the scaffold.

Toe boards may not be required on portable or fixed platforms where the nature of the work requires the employees to sit on the edge of the platform.

Work shall not be performed on a scaffold during storms or high winds.

Work shall not be performed on scaffolds that are covered with snow or ice, unless all snow and ice has been removed and all planking has been sanded to prevent slipping.

Tools, material, and debris shall not be allowed to accumulate in quantities to cause a hazard.

Load Ratings and Requirements for Each Type

Scaffolds shall not be loaded in excess of the working loads for which they are intended. The maximum intended working load for each scaffold shall be posted at a conspicuous location at each jobsite or be provided to each supervisory employee who shall have it readily available at the jobsite. The design load of all scaffolds shall be calculated on the basis of:

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- Light—Designed and constructed to carry a working load of 25 pounds per square foot.
- Medium—Designed and constructed to carry a working load of 50 pounds per square foot.
- Heavy—Designed and constructed to carry a working load of 75 pounds per square foot.

Inspections

Scaffolding shall be inspected, by a qualified person, in conjunction with the manufactures required recommendations. The Competent Person must insure scaffolds are safe prior to and during scaffold use.

- At a minimum, the following shall be inspected after erection, before the start of the day or beginning of a shift change:
 - o Ground or surface footing shall be inspected to ensure that there is no settling.
 - o All main supports and cross braces shall be inspected for any signs of damage, missing pins, bolts and any locks and/or safety keepers.
 - o All walking surfaces and/or planks shall be inspected for damage and proper placements and any possible movement.
 - o All walkways and planks must be secure to prevent any movement.
- Inspection shall be made to ensure that the scaffold is stable and any movement is prevented.
- If during the inspection, a defect or damage to the scaffold is discovered, the scaffold shall be tagged out and use prohibited until needed repairs are made.

Mandatory Signs and Tags

Signs and tags shall be visible at all times when work is being performed and shall be removed or covered promptly when the hazards no longer exist.

Defective or unsafe equipment or conditions shall be tagged out by the competent person using a weather resistant tag secured to the scaffolding structure on all four sides and must be complied with.

Danger signs shall be used only where an immediate hazard exists. Danger signs must be posted around the immediate area of the scaffold, to alert other workers of possible danger from falling objects from the scaffold.

Caution Signs and/or barricade tape shall be used to mark off a larger area around scaffolding warning other workers to use caution.

Modifications

Modification and repairs shall be performed by a qualified person, who is competent to certify the scaffolding safe to use.

Employees shall not perform any modifications or repairs, unless they have been trained and certified, failure to comply may result in disciplinary action and or termination.

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Training Requirements

The supervisor shall have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training shall occur before use and include the following areas:

- Basic safety information.
- Hazards including fall protection, electrical safety, falling object protection.
- The proper use of the scaffold, and the proper handling of materials on the scaffold.
- The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used.
- The maximum intended load capacity of the scaffolds used.

The supervisor shall have each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold trained by a competent person to recognize any hazards associated with the work in question.

- The training shall include the following topics, as applicable:
- The nature of scaffold hazards.
- The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in use.
- The design criteria, maximum intended load-carrying capacity and intended use of the scaffold.

When the employer has reason to believe that an employee lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, the employer shall retrain each employee so that the requisite proficiency is regained. Retraining is required in at least the following situations:

- Where changes in scaffolding at the worksite present a hazard about which an employee has not been previously trained.
- Where changes in the types of scaffolds, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been previously trained.
- Where inadequacies in an affected employee's work involving scaffolds indicate that the employee has not retained the requisite proficiency.

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Purpose

The purpose of this program is to address control measures to protect Company employees from stress or injuries when working in cold temperatures.

Scope

Each Company worksite shall implement a site-specific cold weather/cold stress hazard assessment and have the control plan approved by the Company EHS Manager.

Responsibilities

SAFETY MANAGER

- identify and conduct an assessment of tasks and occupations where there is the potential for cold stress
- implement and/or provide controls (engineering, administrative or personal protective equipment) to minimize cold stress
- provide training and education regarding cold stress, including early signs and symptoms of cold-related exposure

WORKER RESPONSIBILITIES

- adhere to all control measures or work procedures that have been designed and implemented to reduce exposure to conditions that could cause cold stress
- leave cold environments if signs or symptoms of cold-related stress appear
- wear all required cold temperature clothing and PPE
- immediately report any signs or symptoms of cold-related stress

Cold Temperature Procedures

HEALTH EFFECTS OF COLD STRESS

Warning signs of hypothermia can include complaints of nausea, fatigue, dizziness, irritability or euphoria. Workers can also experience pain in their extremities (hands, feet, ears, etc.), and severe shivering. Workers should be moved to a heated shelter and seek medical advice when appropriate.

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HAZARD ASSESSMENT

An assessment will be conducted by the Safety Manager to identify the types of jobs or employees who are at risk for cold exposure. Jobs that are at risk for cold exposure include, but are not limited to: airport ground personnel, auto repair and refueling, cold storage, construction and demolition, ice making, logging, mining, oil and gas drilling, pulp and paper, railroad and trucking, snow and trash removal, utility repair and warehousing. The assessment must also consider employees who work inside but have to go outside for any portion of the shift to either perform work or to travel to transportation departure or arrival points.

FACILITIES

- Regularly used walkways and travel ways shall be sanded, salted or cleared of snow and ice as soon as practicable.
- Employees will be informed of the dangers associated with working around unstable snow and ice build-ups. All employees will be informed of the dangers and destructive potential caused by unstable snow build-up, sharp icicles, ice dams and know how to prevent incidents caused by them.
- When dangerous overhead build-ups of snow or ice are present barricades will be used to prevent staff from walking or driving into potential fall zones.

CLOTHING, PPE AND SUPPLIES

Proper cold weather protection must be worn by employees when working in cold, wet and windy conditions. Protective clothing is the most important way to avoid cold stress. The type of fabric also makes a difference.

Cotton loses its insulation value when it becomes wet. Wool, silk and most synthetics, on the other hand, retain their insulation even when wet. The following are recommendations for working in cold environments:

- Wear at least three layers of clothing. An inner layer of wool, silk or synthetic to wick moisture away from the body – a middle layer of wool or synthetic to provide Insulation even when hot - an outer wind and rain protection layer that allows some ventilation to prevent overheating.
- Wear a hat or hood. Up to 40% of body heat can be lost when the head is left exposed.
- Keep a change of dry clothing available in case work clothes become wet.
- With the exception of the wicking layer do not wear tight clothing. Loose clothing allows better ventilation of heat away from the body.
- Do not underestimate the wetting effects of perspiration. Oftentimes wicking and venting of the body's sweat and heat are more important than protecting from rain or snow.
- Wear insulated boots or other footwear. Felt-lined, rubber bottomed, leather-topped boots with removable felt insoles are best suited for heavy work in cold since leather is porous, allowing the boots to "breathe" and let perspiration evaporate.
- Liner socks made from polypropylene will help keep feet dry and warmer by wicking sweat away from the skin. Always wear the right thickness of socks for your boots.
- In extremely cold conditions, where face protection is used, eye protection must be separated from

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the nose and mouth to prevent exhaled moisture from fogging and frosting eye shields or glasses.

- Clothing must be dry. Moisture should be kept off clothes by removing snow prior to entering heated shelters.

Cold weather supplies will be regularly inspected and restocked when necessary by the Company. Regular inspections on cold weather supplies such as hand warmers, jackets, shovels, etc. will be carried out to ensure that supplies are always in stock.

PREVENTATIVE CONTROLS THAT ARE IMPLEMENTED TO AVOID COLD INDUCED INJURIES

- Workers will be under constant protective observation by a co-worker or supervisor. The Company will implement a "Buddy System" to ensure that no employee is working alone in cold work environments.
- Some preventive measures include drinking plenty of liquids, avoiding caffeine and alcohol.
- It is easy to become dehydrated in cold weather. If possible, heavy work should be scheduled during the warmer parts of the day.
- Take breaks out of the cold.
- Try to work in pairs to keep an eye on each other and watch for signs of cold stress.
- Avoid fatigue since energy is needed to keep muscles warm.
- Take frequent breaks and consume warm, high calorie food such as pasta to maintain energy reserves.
- If a worker exposed to cold shows signs or reports symptoms of cold stress or injury the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician.
- For continuous work in temperatures below the freezing point, heated warming shelters such as tents, cabins or rest rooms should be available. The work should be paced to avoid excessive sweating. If such work is necessary, proper rest periods in a warm area should be allowed and employees should change into dry clothes.
- New employees should be given enough time to get acclimatized to cold and protective clothing before assuming a full workload.
- For work below the freezing point, metal handles and bars should be covered by thermal insulating material. Also, machines and tools should be designed so that they can be operated without having to remove mittens or gloves.

Training

Company employees who are required to work in cold weather conditions will receive initial and annual training regarding the health effects of cold exposure and proper rewarming procedures, recognition of and first aid for frostbite and hypothermia, required protective clothing, proper use of warming shelters, the buddy system, maintaining communications, vehicle breakdown procedures and proper eating and drinking habits for working in the cold.

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HEALTH EFFECTS

Where employees are exposed to work conditions that may present a hazard because of excessive cold Company shall ensure that a competent person provides training to ensure the employees are familiar with the signs and symptoms of cold weather induced health problems such as hypothermia, frostbite and trench foot. Training will include:

- Hypothermia occurs when body heat is lost faster than it can be replaced. When the core body temperature drops below the normal 98.6°F to around 95°F the onset of symptoms normally begins. The person may begin to shiver and stomp their feet in order to generate heat. Workers may lose coordination, have slurred speech and fumble with items in the hand. The skin will likely be pale and cold.
- Frostbite occurs when the skin actually freezes and loses water. In severe cases, amputation of the frostbitten area may be required. While frostbite usually occurs when the temperatures are 30°F or lower, wind chill factors can allow frostbite to occur in above freezing temperatures. Frostbite typically affects the extremities, particularly the feet and hands. The affected body part will be cold, tingling, stinging or aching followed by numbness. Skin color turns red, then purple, then white and is cold to the touch. There may be blisters in severe cases.
- Trench Foot or immersion foot is caused by having feet immersed in cold water at temperatures above freezing for long periods of time. It is similar to frostbite but considered less severe. Symptoms usually consist of tingling, itching or a burning sensation. Blisters may be present.

Workers and supervisors involved with work in cold environments should be informed about symptoms of adverse effect exposure to cold, proper clothing habits, safe work practices, physical fitness requirements for work in cold,

and emergency procedures in case of cold injury. While working in cold, a buddy system should be used. Look out for one another and be alert for the symptoms of hypothermia.

FIRST AID TRAINING

Employees will be trained to administer proper first aid treatment on cold induced injuries or illnesses. All COMPANY employees who are required to perform work in cold conditions will be knowledgeable on how to administer first aid treatment on cold induced injuries or illnesses.

All training shall be documented.

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			Next Revision Date:	8/01/2025
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Purpose

The purpose of this program is to ensure the safe use of compressed air and related equipment requirements.

Scope

This program covers all employees and contractors who handle and/or use compressed air.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper handling, storage and use requirements for compressed air.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.

Employees

- Shall follow all requirements regarding the safe handling and use of compressed air and related equipment.

Procedure

Hazards of Using Compressed Air Compressed air is extremely forceful. Depending on its pressure, compressed air can dislodge particles. These particles are a danger since they can enter eyes or abraded skin. There have also been reports of hearing damage caused by the pressure of compressed air and by its sound.

Compressed air itself is also a serious hazard. On rare occasions, some of the compressed air can enter the blood stream through a break in the skin or through a body opening. The consequences of even a small quantity of air or other gas in the blood can quickly be fatal.

Horseplay has been a cause of some serious workplace accidents caused by individuals not aware of the hazards of compressed air or proper work procedures.

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General Precautions

To prevent injury when working with compressed air:

- A compressed-air tool operator must wear eye protection and other appropriate personal protective equipment.
- Before operating an air hose, examine all connections to make sure they are tight and will not come loose under pressure. A loose air hose can make a dangerous bullwhip.
- Check the air hose carefully to make sure it is in good condition before opening the valve to let air into the hose; when the job is finished, turn off the valves on both the tool and the airline.
- Hold the nozzle when turning the air on or off.

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			Next Revision Date:	8/01/2025
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Purpose:

The purpose of this program is to prevent injury from failing or failure of compressed gas cylinders and to establish requirements for handling, lifting, and storing compressed gas cylinders safely.

Scope

This program covers all employees and contractors who handle, transport and/or use compressed gas cylinders.

Key Responsibilities

MANAGERS/SUPERVISORS

- Shall ensure that all employees are aware of the proper handling, storage and use requirements for compressed gas cylinders.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.

EMPLOYEES

- Shall follow all requirements regarding the safe handling, storage and use of compressed gas cylinders.

Procedure

GENERAL

Cylinders shall not be accepted, stored, or used if evidence of denting, bulging, pitting, cuts, neck, or valve damage is observed. If damage is observed:

- The cylinder must be taken out of service.
- The cylinder's owner shall be notified to remove the cylinder from the premises.
- If owned, the cylinder shall be de-pressured and inspected as required by this program.

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CYLINDER IDENTIFICATION

Gas identification shall be stenciled or stamped on the cylinder, or a label used. No compressed gas cylinder shall be accepted for use that does not legibly identify its content by name.

HANDLING

Valve caps must be secured onto each cylinder before moving or storage.

Secure the cylinder in a blanket when being lifted by mechanical means. Slings, ropes, or electromagnets are prohibited to be used for lifting compressed gas cylinders.

The preferred means to move compressed gas cylinders is with a cart, carrier or with a helper.

Compressed gas cylinders must not be allowed to strike each other.

When a cylinder cap cannot be removed by hand the cylinder shall be tagged "Do Not Use" and returned to the designated storage area for return to vendor.

STORING

All cylinders must be secured upright in a safe, dry, well-ventilated area that limits corrosion and deterioration.

- Cylinders must be secured by means that will prevent the cylinder from falling.
- When securing the cylinder, the restraints shall not be attached to electrical conduit or process piping.

Empty and non-empty cylinders shall be stored separately. All stored cylinders shall be capped.

Oxygen cylinders must be stored a minimum of 20 feet from combustible gas cylinders or areas where there may be open flame or arcing. Cylinders may also be stored where the oxygen is separated from combustible gas cylinders by a 5 foot or higher wall with a fire resistance rating of at least 30 minutes.

Storage areas for full and empty cylinders must be designated and labeled. Cylinders should be stored in designated storage areas away from elevators, stairs, or gangways.

USE

Cylinders must be equipped with the correct regulators. Regulators and cylinder valves should be inspected for grease, oil, dirt, and solvents. Only tools provided by the supplier should be used to open and close cylinder valves.

Never force or modify connections.

Only regulators and gauges shall be used within their designated ratings.

The use of a pressure-reducing regulator is required at the cylinder unless the total system is designed for the maximum cylinder pressure.

Valves must be closed when cylinders are not in use. Cylinders

shall not be used as rollers or supports.

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Cylinders shall not be placed where they can come in contact with electrical circuits.

Cylinders must be protected from sparks, slag or flame from welding, burning or cutting operations. Empty

Cylinders must be returned to designated storage areas as soon as possible after use.

INSPECTION OF COMPRESSED GAS CYLINDERS

The Company shall determine that compressed gas cylinders under its control are in a safe condition to the extent that this can be determined by visual inspection. Visual and other inspections shall be conducted as prescribed in

the Hazardous Materials Regulations of the Department of Transportation (49 CFR parts 171-179 and 14 CFR part 103). Where those regulations are not applicable, visual, and other inspections shall be conducted in accordance with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962. Some elements include, but are not limited to:

- Hoses and connections should be inspected regularly for damage. Hoses should be stored in cool areas and protected from damage.
- These owned cylinders shall be visually inspected prior to charging before each use and at least annually.
- All inspections and testing must be documented.

HIGH PRESSURE CYLINDERS ARE THOSE CYLINDERS MARKED FOR SERVICE PRESSURES OF 900 PSI AND GREATER.

- High pressure cylinders shall be taken out of service and submitted for re-qualification testing when any of the following conditions are identified by visual inspection.
- Cuts, dings, gouges, dents, bulges, pitting, neck damage or evidence of exposure to fire.
- The cylinders shall be inspected and re-tested according to the requirements stated in 49 CFR 180.205 and .209.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

LOW PRESSURE CYLINDERS ARE THOSE CYLINDERS MARKED FOR SERVICE PRESSURES OF LESS THAN 900 PSI.

- Low pressure cylinders fall into two categories, those requiring requalification and those that do not require re-qualification.
- Low pressure cylinders that do not require re-qualification shall be taken out of service and condemned when any of the following conditions are identified during inspection:
 - o The tare weight of the cylinder is less than 90% of the stamped-on weight of the cylinder.
 - o Observed pitting, dents, cuts, bulging, gouges, or evidence of exposure to fire.

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- Low pressure cylinders subject to re-qualification shall be taken out of service, inspected and retested when visual inspection identifies any of the following conditions: dents, bulges, pitting or neck damage.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

LEAKING CYLINDERS

Leaking cylinders should be moved promptly to an isolated, well-ventilated area, away from ignition sources. Soapy water should be used to detect leaks. If the leak is at the junction of the cylinder valve and cylinder, do not try to repair it. Contact the supplier and ask for response instructions.

TRANSPORTATION

Cylinders must be transported in a vertical secured position using a cylinder basket or cart and must not be rolled. Regulators should be removed, and cylinders capped before movement. Cylinders should not be dropped or permitted to strike violently, and protective caps are not used to lift cylinders.

EMPTY CYLINDER MARKING

Cylinders should be marked as "MT" and dated when empty. Never mix gases in a cylinder and only professionals should refill cylinders. Empty cylinders must be handled as carefully as when filled.

ENGINEERING CONTROLS

Engineering controls such as emergency shutoff switches, gas cabinets and flow restrictors should be used wherever possible to control hazards. Emergency eyewash facilities should be present where corrosive gases or materials are used.

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Purpose:

The purpose of this program is to prevent injury from hazards associated with concrete and masonry construction work.

Scope

This program covers all employees involved in concrete and/or masonry work.

Key Responsibilities

MANAGERS/SUPERVISORS

- Shall ensure that all employees are aware of the hazards associated with concrete and masonry during construction and are properly trained prior to their exposure of those hazards.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.
- Conduct operations and train employees.

EMPLOYEES

- Shall follow all requirements regarding the safe work practices and requirements of this program.
- Report all hazards if not previously made aware of them, especially when changes occur.

Procedure

HAZARDS ASSOCIATED WITH CONCRETE/MASONRY CONSTRUCTION

- Concrete Buckets: Impact injuries due to defective slings/hardware
- Concrete Pumper Truck: Electrical injuries due to overhead power lines; Impact injuries due to improper operator operations
- Concrete: Caustic burns to eyes and skin; Impact injury due to falling buckets, blocks, bricks, or other objects; Respiratory hazards due to concrete dust
- Cranes: Impact injuries due to defective slings or unbalanced load

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- Electric Saws: Shock injuries due to defective power cords or non-grounded circuit
- Flagging: Impact injuries for flaggers exposed to traffic
- Forklifts: Impact injuries due to exceeding the lifting capacity or improper operation by operator
- Form Work: Fall injuries from height, ladders, or open excavation; Slips and trips working with footers: Cuts and puncture wounds from exposed nails
- Leading Edge Work: Fall injuries due to height and lack of knowledge - only experienced and authorized workers allowed
- Rebar: Struck Against injuries due to impalement on end of rebar;
- Slips and trips working with rebar Injuries can result from unsafe work practices including:
 - premature removal of formwork.
 - failure to brace masonry walls.
 - failure to adequately support precast panels.
 - inappropriate operation of equipment.
 - failure to guard the end of reinforcing steel.
 - inadequate shoring, which can lead to formwork collapse.

SAFE WORK PRACTICES AND REQUIREMENTS

Construction Loads

- The Company must not place construction loads on a concrete structure or portion of a concrete structure unless the Company determines, based on information received from a person who is qualified in structural design, that the structure or portion of the structure is capable of supporting the intended loads.

Reinforcing Steel

- All protruding reinforcing steel, onto and into which employees could fall, must be guarded to eliminate the hazard of impalement.

Post-Tensioning Operations

- Employees (except those essential to the post-tensioning operations) must not be permitted to be behind the jack during tensioning operations.
- Signs and barriers must be erected to limit employee access to the post-tensioning area during tensioning operations.

Concrete Buckets

- Employees must not be permitted to ride concrete buckets.

Working Under Loads

- Employees must not be permitted to work under concrete buckets while the buckets are being elevated or lowered into position.

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- To the extent practicable, elevated concrete buckets must be routed so that no employee or the fewest employees possible are exposed to the hazards associated with falling concrete buckets.

CONCRETE AND MASONRY CONSTRUCTION

Personal Protective Equipment

Employees must not be permitted to apply a cement, sand, and water mixture through a pneumatic hose unless they are wearing protective head and face equipment.

General Requirements for Formwork

Formwork must be designed, fabricated, erected, supported, braced, and maintained so that it will be capable of supporting without failure all vertical and lateral loads that might be applied to the formwork. As indicated in the Appendix to the standard, formwork that is designed, fabricated, erected, supported, braced, and maintained in conformance with Sections 6 and 7 of the American National Standard for Construction and Demolition Operations—Concrete and Masonry Work (ANSI) A10.9-1983 also meets the requirements of this paragraph.

Drawings or Plans

Drawings and plans, including all revisions for the jack layout, formwork (including shoring equipment), working decks, and scaffolds, must be available at the jobsite.

Shoring and Reshoring

- All shoring equipment (including equipment used in reshoring operations) must be inspected prior to erection to determine that the equipment meets the requirements specified in the formwork drawings.
- Damaged shoring equipment must not be used for shoring. Erected shoring equipment must be inspected immediately prior to, during, and immediately after concrete placement. Shoring equipment that is found to be damaged or weakened after erection must be immediately reinforced.
- The sills for shoring must be sound, rigid, and capable of carrying the maximum intended load. All base plates, shore heads, extension devices, and adjustment screws must be in firm contact and secured, when necessary, with the foundation and the form.

If single-post shores are used one on top of another (tiered), then additional shoring requirements must be met. The shores must be as follows:

- Designed by a qualified designer and the erected shoring must be inspected by an engineer qualified in structural design,
- Vertically aligned,
- Spliced to prevent misalignment, and
- Adequately braced in two mutually perpendicular directions at the splice level. Each tier also must be diagonally braced in the same two directions.

Adjustment of single-post shores to raise formwork must not be made after the placement of concrete.

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Reshoring must be erected, as the original forms and shores are removed, whenever the concrete is required to support loads more than its capacity.

Vertical Slip Forms

The steel rods or pipes on which jacks climb or by which the forms are lifted must be specifically designed for that purpose and adequately braced where not encased in concrete.

Forms must be designed to prevent excessive distortion of the structure during the jacking operation. Jacks and vertical supports must be positioned in such a manner that the loads do not exceed the rated capacity of the jacks.

The jacks or other lifting devices must be provided with mechanical dogs or other automatic holding devices to support the slip forms whenever failure of the power supply or lifting mechanisms occurs.

REQUIREMENTS FOR CAST-IN-PLACE CONCRETE

- The form structure must be maintained within all design tolerances specified for plumbness during the jacking operation.
- The predetermined safe rate of lift must not be exceeded. All vertical slip forms must be provided with scaffolds or work platforms where employees are required to work or pass.

Reinforcing Steel

- Reinforcing steel for walls, piers, columns, and similar vertical structures must be adequately supported to prevent overturning and collapse.
- The Company must take measures to prevent unrolled wire mesh from recoiling. Such measures may include, but are not limited to, securing each end of the roll, or turning over the roll.

Removal of Formwork

Forms and shores (except those that are used for slabs on grade and slip forms) must not be removed until COMPANY determines that the concrete has gained sufficient strength to support its weight and superimposed loads. Such determination must be based on compliance with one of the following:

- The plans and specifications stipulate conditions for removal of forms and shores and such conditions have been followed, or
- The concrete has been properly tested with an appropriate American Society for Testing and Materials (ASTM) standard test method designed to indicate the concrete compressive strength and the test results indicate that the concrete has gained sufficient strength to support its weight and superimposed loads.

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PRECAST CONCRETE

- Precast concrete wall units, structural framing and tilt-up wall panels must be adequately supported to prevent overturning and to prevent collapse until permanent connections are completed.
- Lifting inserts that are embedded or otherwise attached to tilt-up wall panels must be capable of supporting at least two times the maximum intended load applied or transmitted to them. Lifting inserts for other precast members must be capable of supporting four times the load. Lifting hardware shall be capable of supporting at least five times the maximum intended load applied or transmitted to the lifting hardware.
- Only essential employees are permitted under precast concrete that is being lifted or tilted into position.

LIFT-SLAB OPERATIONS

- Lift-slab operations must be designed and planned by a registered professional engineer who has experience in lift-slab construction. Such plans and designs must be implemented by GROOM / EXPRO and must include detailed instructions and sketches indicating the prescribed method of erection. The plans and designs must also include provisions for ensuring lateral stability of the building/structure during construction.
- Jacking equipment must be marked with the manufacturer's rated capacity and must be capable of supporting at least two and one-half times the load being lifted during jacking operations and the equipment must not be overloaded.
- Jacks/lifting units must be designed and installed so that they will neither lift nor continue to lift when loaded more than their rated capacity and jacks/lifting units must have a safety device which will cause the jacks/lifting units to support the load at any position in the event of their malfunction or loss of ability to continue to lift.
- No employee, except those essential to the jacking operation, shall be permitted in the building/structure while any jacking operation is taking place unless the building/structure has been reinforced sufficiently to ensure its integrity during erection.
- Under no circumstances shall any employee who is not essential to the jacking operation be permitted immediately beneath a slab while it is being lifted.

MASONRY CONSTRUCTION

Whenever a masonry wall is being constructed, employers must establish a limited access zone prior to the start of construction. The limited access zone must be as follows:

- Equal to the height of the wall to be constructed plus 4 feet and shall run the entire length of the wall.
- On the side of the wall that will be unscaffolded;
- Restricted to entry only by employees actively engaged in constructing the wall; and

Kept in place until the wall is adequately supported to prevent overturning and collapse unless the height of the wall is more than 8 feet and unsupported, in which case it must be braced. The bracing must remain in place until permanent supporting elements of the structure are in place.

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Purpose

The purpose of this program is to ensure the safety of all employees and contractors working for the Company and to comply with all federal and state requirements that pertain to confined spaces to include 29 CFR 1910.146, 29 CFR 1926, Subpart AA

Scope

This program covers all employees and other workers that may be involved in confined space entry. When work is performed on a non-owned or operated site, the operator's program shall take precedence. This document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Acceptable entry conditions - the conditions that must exist in a confined space to allow entry and to ensure that employees involved with a confined space entry can safely enter into and work within the space.

Attendant - an individual stationed outside one or more Confined space who monitors the authorized Entrants and who performs all Attendants' duties assigned in the the Company Confined Space Program. Attendants must have sufficiently completed and fully understand the Confined Space training and is approved by the EHS Manager to work in a confined space as an Attendant.

Authorized Entrant - an individual who is authorized by The Company to enter a confined space. Entrants must have sufficiently completed and fully understand the Confined Space training and be approved by the EHS Manager to work in a Confined Space as an Authorized Entrant.

Blanking or Blinding - the absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.

Confined Space

- A space that is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous occupancy.

Double block and bleed - the closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.

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Emergency - any occurrence (including any failure of hazard control or monitoring equipment) or an event internal or external to the confined space that could endanger Entrants.

Engulfment - the surrounding and effective capture of a person by a liquid or finely divided (flow-able) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

Entry - the action by which a person passes through an opening into a confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the Entrant's body breaks the plane of an opening into the space.

Entry permit - the written or printed document that is provided by the Company to allow and control entry into a confined space that contains the information specified in this program.

Entry Supervisor - the person responsible for determining if acceptable entry conditions are present at a confined space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section.

- Entry Supervisors must have sufficiently completed and fully understand the Confined Space training and be approved by the HSE Manager to work in a confined space.
- An Entry Supervisor also may serve as an Attendant or as an authorized Entrant, as long as that person is trained and equipped as required by this section for each role he or she fills. Also, the duties of Entry Supervisor may be passed from one individual to another during the course of an entry operation.
- The Entry Supervisor is responsible to test and monitor the atmosphere conditions.

Hazardous atmosphere - an atmosphere that may expose employees to the risk of death, incapacitation, and impairment of ability to self-rescue (that is, escape unaided from a confined space), injury, or acute illness from one or more of the following causes:

- Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL), (0% is normal).
- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent, (20.9 % is normal).
- Any other atmospheric condition that is immediately dangerous to life or health. (Ex.-H₂S 10%, 0% is normal).
- Note: For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Material Safety Data Sheets that comply with the Hazard Communication Standard, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

Hot work permit - the written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.

Immediately dangerous to life or health (IDLH) - any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a confined space.

- Note: Some materials -- hydrogen fluoride gas and cadmium vapor, for example -- may produce immediate transient effects that, even if severe, may pass without medical attention, but are followed by sudden, possibly fatal collapse 12-72 hours after exposure. The victim "feels normal" from recovery from transient effects until collapse. Such materials in hazardous quantities are considered to be "immediately dangerous to life or health".

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Inerting - the displacement of the atmosphere in a permit space by a non-combustible gas (such as nitrogen) to such an extent that the resulting atmosphere is non-combustible. This procedure produces an IDLH oxygen deficient atmosphere.

Isolation - the process by which a confined space is removed from service and completely protected against the release of energy and material into the space by such means as: blanking or blinding; misaligning or removing sections of lines, pipes, or ducts; a double block and bleed system; lockout or tag-out of all sources of energy; or blocking or disconnecting all mechanical linkages.

Line Breaking - the intentional opening of a pipe, line, or duct that is or has been carrying flammable, corrosive, or toxic material, an inert gas, or any fluid at a volume, pressure, or temperature capable of causing injury.

Non-Permit Confined Space - A confined space that does not contain or, have the potential to contain any hazard capable of causing death or serious physical harm.

Oxygen-deficient atmosphere - an atmosphere containing less than 19.5 percent oxygen by volume.

Oxygen-enriched atmosphere - an atmosphere containing more than 23.5 percent oxygen by volume.

Permit-Required Confined Space - a confined space that has one or more of the following characteristics:

- Contains or has a potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an Entrant.
- Has an internal configuration such that an Entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section.
- Contains any other recognized serious safety or health hazard.

Permit system - the employer's written procedure for preparing and issuing permits for entry and for returning the confined space to service following termination of entry.

Prohibited condition - any condition in a confined space that is not allowed by the permit during the period when entry is authorized.

Rescue service - the personnel designated to rescue employees from Permit-Required Confined Spaces.

Retrieval system - the equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from confined spaces.

Testing - the process by which the hazards that may confront Entrants of a confined space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

Responsibilities

MANAGERS/SUPERVISOR

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- Shall ensure that all employees have been trained and fully understand the requirements of this program.
- Shall provide the necessary equipment to comply with these requirements and ensure that all employees are trained on its use.
- Shall ensure that all confined space assessments have been conducted and documented.
- Shall ensure that provisions and procedures are in place for the protection of employees from external hazards including, but not limited to, pedestrians, vehicles and other barriers and by use of the pre-entry checklist verifying that conditions in the permit space are acceptable for entry during its duration.
- Shall ensure that all Permit-Required Confined Space permits are posted.
- Shall ensure an annual review of the program including all entry permits issued during that annual period.
- Shall ensure that confined spaces are identified properly as either a Non-Permit Confined Space or a Permit-Required Confined Space.
- Shall ensure that all confined spaces that have been identified as “no entry” have signs that state, “DANGER- DO NOT ENTER”.
- Shall ensure signs have been posted at all Permit-Required Confined Space areas that state, “DANGER – PERMIT-REQUIRED CONFINED SPACE” along with the proper warning word such as “ASPHYXIAN, FLAMMABILITY or TOXIC HAZARD”
- Shall file all permits at the area offices for review. Permits shall be kept on file for one year.

AFFECTED EMPLOYEE

- Shall attend Confined Space Entry training commensurate with their duties and when duties change as required.
- Shall comply with all aspects of this program.
- Authorized Entrants, Attendants and Entry Supervisors may be any The Company employee that is authorized by management to work in a confined space setting and that has been trained and is proficient in the understanding of program requirements.

AUTHORIZED ENTRY SUPERVISOR DUTIES

- Shall have a toolbox talk/JSA safety meeting, with all workers to be involved in the confined space entry and review the job to be performed and what safety concerns may be present.
- Shall confirm that all isolation, Lock/Out and Tag/Outs have been completed prior to entry into a confined space.
- Shall ensure that the requirements of this program are followed and maintained.
- Shall test all atmospheric conditions prior to entry and shall complete and maintain the confined space permit form and have it accessible for review on the job site at all times.
- Shall notify The Company supervisor of entry into a confined space and notify the supervisor of

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any changes that may occur during an entry.

- If the confined space poses a hazard that cannot be eliminated, the Entry Supervisor must arrange for rescue services.
- If the confined space poses no hazards to the Entrants, the Entry Supervisor can re-classify the confined space to a Non-Permit Confined Space.
- A stand-by rescue team is not required to be on site for Non-Permit Confined Space entries.

AUTHORIZED ATTENDANT DUTIES

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- Is aware of possible behavioral effects of hazard exposure in authorized Entrants.
- Continuously maintains communication and an accurate count of authorized Entrants in the confined space and ensures that proper documentation is used to identify authorized Entrants, and accurately identifies who is in the confined space.
- Remains outside the confined space during entry operations until relieved by another Attendant.
- Note: Attendants may enter a confined space to attempt a rescue, if they have been trained and equipped for rescue operations as required and only when they have been relieved by another authorized Attendant.
- Monitors activities inside and outside the confined space to determine if it is safe for Entrants to remain in the space and orders the authorized Entrants to evacuate the confined space immediately under any of the following conditions:
 - o If the Attendant detects a prohibited condition;
 - o If the Attendant detects the behavioral effects of hazard exposure in an authorized Entrant;
 - o If the Attendant detects a situation outside the space that could endanger the authorized Entrants;
 - o If the Attendant cannot effectively and safely perform all the duties required.
- Summon rescue and other emergency services as soon as the Attendant determines that authorized Entrants may need assistance to escape from confined space hazards.
- Takes the following actions when unauthorized persons approach or enter a confined space while entry is underway:
 - o Warn the unauthorized persons that they must stay away from the confined space;
 - o Advise the unauthorized persons to exit the confined space immediately, if they have entered the space;
 - o Inform the authorized Entrants and the Entry Supervisor if unauthorized persons have entered the confined space.
- Performs no duties that might interfere with the Attendant's primary duty to monitor and protect the authorized Entrants.
- Authorized Attendants shall not monitor more than one confined space at a time.

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AUTHORIZED ENTRANT DUTIES

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- Uses appropriate personal protective equipment properly, e.g., face and eye protection, and other forms of barrier protection such as gloves, aprons, coveralls, and breathing equipment;
- Is aware of possible behavioral effects of hazard exposure in authorized Entrants;
- Shall witness and verify calibrated air monitoring data and, if approved, sign off before entry is made.
- Is entitled to request additional monitoring at any time.
- Maintain communication with the Attendant to enable the Attendant to monitor the Entrants' status as well as to alert the Entrant to evacuate if needed; and
- Exit from confined space as soon as possible when ordered by an Attendant or Entry Supervisor, when the Entrant recognizes the warning signs or symptoms that an exposure exists, when a prohibited condition exists, or when an alarm is activated.

Procedure

NON-PERMIT CONFINED SPACE ENTRY

If testing of the confined space atmosphere is within acceptable limits without the use of forced air ventilation and the space is properly isolated, the space can be entered by following the requirements for Level I confined space entry.

- Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
- Entrants shall review and sign the confined space permit.

Employees may enter and work in the confined space as long as LEL, O2, and toxicity hazards remain at safe levels.

- Complete the Company Confined Space Entry Permit to document that there are no confined space hazards. Make this certification available to all personnel entering the space.
- A trained Attendant must always be outside the confined space. The Attendant must monitor the authorized Entrants for the duration of the entry operation.

Exception: The Attendant requirements for Level I confined space entry may be exempted if the job assessment is performed and has determined that there are no inherent dangers to allow single person entry.

- This provision is intended to permit field operations to enter crankcases, shallow valve boxes, cellars, excavations, etc. without an Attendant being present and all other aspects of the entry permit

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complied with.

- When there are changes in the use and configuration of a confined space that might increase the hazards to the Entrants (e.g., using epoxy coating on a tank floor, welding, painting, etc.), re-evaluate the space. If necessary, reclassify the space as a Permit-Required Confined Space.
- Continuously monitor the confined space atmosphere to ensure that it is still safe.
- The space must not contain a hazardous atmosphere while personnel are inside.
- If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
- Re-evaluate the space to determine how the hazardous atmosphere developed.
- The Entry Supervisor shall cancel the entry permit.
- Take action to protect personnel before any subsequent activity to re-enter the space takes place.
- Reissue the The Company Confined Space Entry Permit before allowing Entrants to re-enter the space.
- If necessary, reclassify the space as a Permit-Required Confined Space.
- Ensure that vehicle or other equipment exhaust does not enter the space.

PERMIT-REQUIRED CONFINED SPACE ENTRY

If the space is properly isolated and results of air monitoring are above acceptable parameters without local exhaust ventilation in operation, classify the entry as a Permit-Required Confined Space.

- Complete the Company Confined Space Entry Permit before proceeding with work in a Permit-Required Confined Space.
- Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
- Entrants shall review and sign the confined space permit.
- At least one trained Attendant must always be outside the Permit-Required Confined Space.
- The Attendant must monitor the authorized Entrants for the duration of the entry operation.
- Only authorized Entrants may enter a Permit-Required Confined Space.
- All Entrants must sign in and out on the entry permit when entering and leaving a Permit-Required Confined Space.
- The back of the permit or a sign-in sheet must be used for this purpose.
- Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited.
- Conditions must be continuously monitored where Entrants are working to determine that acceptable conditions are maintained during entry.
- If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
 - o The Entry Supervisor shall cancel the entry permit.
 - o Re-evaluate the space to determine how the hazardous atmosphere developed.
 - o Take action to protect personnel before any subsequent activity to re-enter the space takes place.
 - o Re-issue the Company Confined Space Entry Permit before allowing Entrants to re-enter

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the space.

- o Employees or their representatives are entitled to request additional monitoring at any time.
- The permit must be terminated when the entry operations are complete or when permit conditions change (i.e., hazardous air monitoring results are noted, unsafe behaviors are observed, etc.).
- The minimum rescue equipment required for Permit-Required Confined Space entry is covered in the Rescue & Emergency section of this program.
- Permit-Required Confined Space entry operations will be reviewed when The Company believes that the requirements of this confined space program may not adequately protect personnel.
- If deficiencies are found in the program, the program will be revised and personnel will be trained in the new revisions before subsequent entries are authorized.

CONDITIONS REQUIRED TO USE ALTERNATE PROCEDURES:

- We can demonstrate that all physical hazards in the space are eliminated or isolated through engineering controls so that the only hazard posed by the permit space is an actual or potential hazardous atmosphere;
- We can demonstrate that continuous forced air ventilation alone is sufficient to maintain that permit space safe for entry, & that, in the event the ventilation system stops working, entrants can exit the space safely;
- We develop monitoring & inspection data that supports the demonstrations required by preceding two subparagraphs, above (1&2)
- If an initial entry of the permit space is necessary to obtain the data required by paragraph preceding paragraph above (3), the entry will be performed in compliance with:
 - §§1926.1204 Permit-required confined space program.
 - §§1926.1205 Permitting process.
 - §§1926.1206 Entry permit.
 - §§1926.1207 Training.
 - §§1926.1208 Duties of authorized entrants.
 - §§1926.1209 Duties of attendants.
 - §§1926.1210 Duties of entry supervisors.
 - §§1926.1211 Rescue and emergency services.
- The above determinations and supporting data required by the above paragraphs are documented and are made available to each employee who enters the permit space under the terms of the alternate procedures or to that employee's authorized representative; and
- Entry into the permit space under the terms below:

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ALTERNATE PROCEDURES

- Any conditions making it unsafe to remove an entrance cover must be eliminated before the cover is removed.
- When entrance covers are removed, the opening must be immediately guarded by a railing, temporary cover, or other temporary barrier that will prevent an accidental fall through the opening and that will protect each employee working in the space from foreign objects entering the space.
- Before an employee enters the space, the internal atmosphere must be tested, with a calibrated direct-reading instrument, for oxygen content, for flammable gases & vapors, & for potential toxic air contaminants, in that order. Any employee who enters the space, or that employee's authorized representative, must be provided an opportunity to observe the pre-entry testing required by this
- No hazardous atmosphere is permitted within the space whenever any employee is inside the space.
- Continuous forced air ventilation must be used, as follows:
 - o An employee must not enter the space until the forced air ventilation has eliminated any hazardous atmosphere;
 - o The forced air ventilation must be so directed as to ventilate the immediate areas where an employee is or will be present within the space & must continue until all employees have left the space
 - o The air supply for the forced air ventilation must be from a clean source and must not increase the hazards in the space.
 - o The atmosphere within the space must be continuously monitored unless, as the entry employer, we can demonstrate that equipment for continuous monitoring is not commercially available or periodic monitoring is sufficient. If continuous monitoring is used, we must ensure that the monitoring equipment has an alarm that will notify all entrants if a specified atmospheric threshold is achieved, or that an employee will check the monitor with sufficient frequency to ensure that entrants have adequate time to escape. If continuous monitoring is not used, periodic monitoring is required.
 - o All monitoring must ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere.
- Any employee who enters the space, or that employee's authorized representative, must be provided with an opportunity to observe the testing required by this paragraph (e)(2)(vi).
- If a hazard is detected during entry:
 - o Each employee must leave the space immediately;
 - o The space must be evaluated to determine how the hazard developed; and
 - o We must implement measures to protect employees from the hazard before any subsequent entry takes place.
- We must ensure a safe method of entering and exiting the space. If a hoisting system is used, it must

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be designed and manufactured for personnel hoisting; however, a job-made hoisting system is permissible if it is approved for personnel hoisting by a registered professional engineer, in writing, prior to use.

- We must verify that the space is safe for entry and that the pre-entry measures required by these alternate procedures terms have been taken, through a written certification that contains the date, the location of the space, and the signature of the person providing the certification. The certification must be made before entry and must be made available to each employee entering the space or to that employee's authorized representative.

CLASSIFICATION/RECLASSIFICATION OF A SPACE:

When there are changes in the use or configuration of a non-permit confined space that might increase the hazards to entrants, or some indication that the initial evaluation of the space may not have been adequate, as an entry employer, we must have a competent person re-evaluate that space and, if necessary, reclassify it as a permit-required confined space.

A space that we have classified as a permit-required confined space may only be reclassified as a non-permit confined space when a competent person determines that all of the below applicable requirements have been met:

- If the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated or isolated without entry into the space (unless we can demonstrate that doing so without entry is infeasible), the permit space may be reclassified as a non-permit confined space for as long as the non-atmospheric hazards remain eliminated or isolated;
- As the entry employer, we eliminate or isolate the hazards without entering the space, unless it can demonstrate that this is infeasible. If it is necessary to enter the permit space to eliminate or isolate hazards, the entry will be performed in compliance with:
 - §§1926.1204 Permit-required confined space program.
 - §§1926.1205 Permitting process.
 - §§1926.1206 Entry permit.
 - §§1926.1207 Training.
 - §§1926.1208 Duties of authorized entrants.
 - §§1926.1209 Duties of attendants.
 - §§1926.1210 Duties of entry supervisors.
 - §§1926.1211 Rescue and emergency service
- If testing and inspection during that entry demonstrate that the hazards within the permit space have been eliminated or isolated, the permit space may be reclassified as a non-permit confined

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space for as long as the hazards remain eliminated or isolated;

Note: Control of atmospheric hazards through forced air ventilation does not constitute elimination or isolation of the hazards. These alternate procedures cover permit

space entry where it can be demonstrated that forced air ventilation alone will control all hazards in the space.

- As the entry employer, we must document the basis for determining that all hazards in a permit space have been eliminated or isolated, through a certification that contains the date, the location of the space, and the signature of the person making the determination.
- The certification must be made available to each employee entering the space or to that employee's authorized representative; and
- If hazards arise within a permit space that has been reclassified as a non-permit, each employee in the space must exit the space.
- As the entry employer, we must then re-evaluate the space and reclassify it as a permit space as appropriate in accordance with all other applicable provisions of Confined Spaces in Construction standard.

PRE-JOB PLANNING AND SPACE PREPARATION

The Entry Supervisor must determine that the confined space is properly isolated by blinding, disconnecting, and/or by following local Lock Out/Tag Out procedures.

The Entry Supervisor must discuss with all Entrants the hazards of the space, communication methods and emergency procedures during the confined space entry.

Eliminate any condition making it unsafe to open the equipment to atmosphere.

Promptly guard the opening to prevent an accidental fall through the opening and to protect each employee working in the space from foreign objects entering the space.

If applicable, wash, steam, ventilate or de-gas the confined space to properly free it of possible contaminants. Vent vapors to a safe location.

Do not allow unauthorized personnel to enter a confined space. Barricade and/or guard all confined spaces to prevent entry of unauthorized Entrants.

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If performing hot work in the confined space, precautions must be taken consistent with the The Company Hot Work Permit procedure.

Ensure that vehicle or other equipment exhaust does not enter the space.

PRE-ENTRY SAFETY MEETING

The Entry Supervisor must declare when the confined space is ready for entry.

The Entry Supervisor shall hold a pre-entry safety meeting to discuss all requirements and procedures with all authorized Entrant(s) and Attendant(s) involved with the entry. He/she will discuss other concerns such as previous contents, vessel coating, PPE requirements etc., during this meeting.

The Entry Supervisor must coordinate entry operations when employees of more than one company are working simultaneously in the confined space. This coordination is necessary so that one company's work does not endanger the employees of another company.

EQUIPMENT

Check all work equipment to ensure that it has the proper safety features and is approved for the locations where it will be used. The Entry Supervisor shall ensure that all equipment is properly maintained in a safe condition and that Entrants use the equipment properly.

The following equipment must be considered and may be required when entering a confined space:

- Atmospheric Testing and Monitoring Equipment.
- Barriers, Shields, and Signs – Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited. Any signs used must state "Danger – Permit-Required Confined Space" along with the proper warning word such as "Asphyxiant, Flammability or Toxic Hazard". All barricades must be capable of preventing a person from inadvertently walking into or kicking an object into the space.
- Communications Equipment – Only use intrinsically safe equipment in areas where a hazardous atmosphere may exist. Use a communication system that will keep the Attendant in constant, direct communication with the Entrant(s) working in the confined space. Also, use a communication system that allows the Attendant to summon help from rescue or emergency services.
- Entry and Exit Equipment – (For example: ladders may be needed for safe entry and exit).
- Lighting Equipment – Needed for safe entry, work within the space and exit. Lighting equipment used in the confined space must be certified safe for the location.
- Portable electric lighting used in wet and/or other conductive locations (drums, tanks, vessels)

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must be operated at 12 volts or less. 120 volt lights may be used if protected by a ground-fault circuit interrupter.

- Personal Protective Equipment – Ensure that personnel wear the required personal protective equipment. For respiratory protection requirements, refer to the Respiratory Protection Program.
- Rescue and Emergency Equipment – Except if provided by outside rescue services.
- The Attendants must also have an approved first aid kit.
- Vacuum Trucks – When used, trucks must be properly grounded or bonded to prevent static sparks.
- Ventilating Equipment – Local exhaust air movers used to obtain acceptable atmospheric entry conditions (e.g., Copus air movers).
- Other – Any other equipment necessary for safe entry into and rescue from permit-required confined spaces.

AIR MONITORING

- Before an employee enters the space, the internal atmosphere will be tested with a calibrated direct-reading instrument for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants, in that order. Monitoring results and potential hazards will be shared with the entrants and they must participate in the permit review.
- Air shall be periodically tested while continuous ventilation is applied.
- Any employee, who enters the space, or that employee's authorized representative, shall be provided an opportunity to observe the pre-entry testing required by this paragraph.
- Employees or their representatives are entitled to request additional air monitoring at any time.

VENTILATION

Continuous forced air ventilation must be used and tested as follows:

- An employee may not enter the space until the forced air ventilation has eliminated any hazardous atmosphere;
- The forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is or will be present within the space and shall continue until all employees have left the space;
- The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space.
- The atmosphere within the space shall be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. Any employee who enters the space, or that employee's authorized representative, shall be provided with an opportunity to observe the periodic testing and may request additional monitoring at any time.
- If a hazardous atmosphere is detected during entry, each employee shall leave the space immediately and the space shall be evaluated to determine how the hazardous atmosphere developed; and measures

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shall be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.

MULTIPLE EMPLOYER PROCEDURE

In order not to endanger the employees of any other employer, the Entry Supervisor will:

- Verify that all contractor employees have been trained in confined space and that all contractor employees fully understand the The Company procedures pertaining to Confined Space.
- Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting the requirements of this section.
- Apprise the contractor of the elements, including the hazards identified and the employees' experience with the space, that make the space in question a permit space.
- Inform the contractor of any precautions or procedures that The Company has implemented for the protection of employees in or near permit spaces where contractor personnel will be working.
- Coordinate entry operations with the contractor, when both The Company personnel and contractor personnel will be working in or near confined spaces.
- Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in confined spaces during entry operations.
- In addition to complying with the confined space requirements that apply to all employees, each contractor who is retained to perform permit space entry operations will:
 - o Obtain any available information regarding confined space hazards and entry operations from the The Company Entry Supervisor.
 - o Coordinate entry operations with the The Company Entry Supervisor, when both The Company personnel and contractor personnel will be working in or near permit spaces.
 - o Inform The Company of the confined space program that the contractor will follow and of any hazards confronted or created in the confined space, either through a debriefing or during the entry operation.

RESCUE AND EMERGENCY SERVICES

General

- If entry is to be made into an IDLH atmosphere, or into a space that can quickly develop an IDLH atmosphere (if ventilation fails or for other reasons), the trained rescue team or service must be standing by at the permit space while work is being performed.
- In case of an emergency and/or injuries, the confined space site shall be secured and emergency

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response personnel shall be notified to respond per the host facility emergency plan.

- If there is reliance on host facility or outside services for rescue, the facility host or outside rescue team must be given an opportunity to examine the entry site, practice rescue and decline as appropriate. Reliance on host facility for rescue services must be stated and agreed to in contract language.
- The Attendant shall order the other Entrants not to move the injured nor allow untrained or unauthorized workers into the space that are not trained to handle a confined space rescue.
- Material Safety Data Sheet's for substances that an injured Entrant was exposed to must be provided to the medical facility treating the injured worker.

Permit-Required Confined Space Rescue:

- When the Attendant becomes aware of the need for rescue, the Attendant shall immediately summon the onsite rescue team by the agreed upon communication method, verbally, radio or cell phone, without leaving the vicinity of the confined space.
- The Attendant shall prevent unauthorized personnel from attempting a rescue.
- After the rescue team has been notified, the Attendant shall alert the Entry Supervisor of the emergency via the same communication methods.
- The preferred means of providing rescue service is through the use of a qualified outside rescue service vendor.
- The outside rescue service vendor must:
 - o Be informed of the hazards that they may confront during a rescue.
 - o Be provided access to the Permit-Required Confined Space.
 - o Have access to the space allows the rescue service and local supervision to jointly develop appropriate rescue plans.
- If the Company employees are to perform Permit-Required Confined Space rescues, they must:
 - o Be provided and trained in the use of the proper personal protective equipment necessary to make the rescue.
 - o Be provided PPE at no cost.
 - o Be trained to perform the assigned duties.
 - o Be required to practice making rescues at least once every 12 months.
 - o Be trained in basic first aid and CPR.
 - o Require that at least one member of the rescue team hold a current certification in first aid and CPR.
- If the operator is designated to provide rescue services for The Company, the agreement of services must be included in contract for the job.

Non-entry Rescue

- To facilitate non-entry rescue, an Entrant must be attached to a retrieval system whenever he/she

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enters a Permit-Required Confined Space with a vertical depth of more than 5 feet.

- The retrieval equipment is not required if it will increase the overall risk of the entry, e.g., creating an entanglement hazard, or will not contribute to the rescue of the Entrant.
- Each Entrant shall use a full body harness equipped with a "D" ring located between the shoulders or above the head.
- Wristlets may be used instead of the full body harness, if the use of the full body harness is not feasible or creates a greater hazard *and* that using wristlets is the safest and most effective alternative.
- The retrieval line must be attached to the "D" ring and the other end of the retrieval line attached to a retrieval device or fixed point located outside the space so that rescue can begin as soon as the rescuer becomes aware that rescue is necessary.

ISSUANCE/REVIEWING OF PERMIT

Only when all pre-entry requirements are satisfied, the Entry Supervisor shall issue a completed and signed confined space permit. The confined space permit is valid for one shift.

In the event of any unauthorized entry, employee complaints, a hazard not covered by the permit, the occurrence of an injury or near miss, the entry permit shall be cancelled and a review shall be conducted to provide employee protection and for revising the program prior to authorizing subsequent entries.

An annual review of this program, using the cancelled permits retained within 1 year after each entry, shall be conducted by the HSE Manager to revise the program as necessary to ensure that employees are protected. If no confined space entries were performed during a 12-month period, no review is necessary.

CANCELLATION/CLOSURE OF PERMITS

The Entry Supervisor shall cancel the confined space permit at the end of the job operation, at the end of the shift or when the Entry Supervisor or Attendant determines that conditions in or near the confined space have changed and is hazardous to the Entrants.

The Entry Supervisor shall, at the conclusion of entry operation, close out the permit and provide the safety department the original copy of the Confined Space Permit.

EXPLOSIVE BLASTING WITHIN CONFINED SPACES ADDITIONAL GUIDELINES

- The Primary Blaster (Supervisor) shall confirm (via radio, in person, and/or via written log) with the confined space Entry Supervisor(s) (Foreman) that all Entrant personnel have exited the boiler before initiating the blast warning.
- The Confined Space Entry Supervisor shall have all confined space entrants muster outside the boiler at one of the four red/danger-taped corners (that form the required 50-foot perimeter) to ensure accountability of all personnel and convey such accountability to the Primary Blaster (Supervisor).
- All boiler units shall be deemed a permit-required confined space (PRCS) during explosive

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blasting operations, and

- Each confined space shall have an Attendant (Hole Watch) assigned whose responsibilities include those found in 29 CFR 1926.1209.
- The confined space Entry Supervisor can also serve as the Attendant (Hole Watch) provided that his/her Entry Supervisor work duties do not interfere with his 29 CFR 1926.1209 duties and responsibilities.

Training

Training shall be provided so that all employees whose work is regulated by this program acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned to them.

Training shall be provided to each affected employee before the employee is first assigned duties under this program, if a new hazard has been created or special deviations have occurred and before there is a change in assigned duties.

The employee shall be re-trained:

- Whenever there is a change in confined space operations that presents a hazard about which an employee has not previously been trained.
- Whenever the supervisor has reason to believe either that there are deviations from the permit space entry procedures required by this section or that there are inadequacies in the employee's knowledge or use of these procedures.

The training shall establish employee proficiency in the duties required by this program and shall introduce new or revised procedures, as necessary.

The supervisor shall certify that the training required by this program has been accomplished.

- The certification shall contain each employee's name, the signatures or initials of the trainers and the dates of training.
- The certification shall be available for inspection by employees, their authorized representatives, management, clients and the safety department.

Appendix A: Sample Confined Space Permit Form

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		No.
  		
Confined Space Entry Permit		
PERMIT VALID FOR 12 HOURS ONLY. ALL COPIES OF PERMIT WILL REMAIN AT JOB SITE UNTIL JOB IS COMPLETED Review emergency procedure prior to entry!		
General Information		
Customer/Project Name	Job #	
Customer/Project Name	Job #	
DATE:	TIME:	
ENTRY SUPERVISOR (First & Last Name):	COMMUNICATION PROCEDURES:	
PURPOSE OF ENTRY:		
LOCATION DESCRIPTION (BE SPECIFIC):		
Pre-Entry Checklist		
Field Risk Assessment (JSA) initiated?	Fire extinguisher(s) immediately accessible?	Emergency escape routes identified and communicated to the crew/rescue team?
If no, why?	If no, why?	If no, why?
Equipment/Area locked out/tagged out (de-energized)?	Explosion-proof lighting installed?	Emergency escape retrieval equipment and/or rescue team immediately accessible?
If no, why?	If no, why?	
Has ventilation of the space been done prior to entry?	All entrant(s) wearing respirators?	If yes, specify what type of emergency escape retrieval equipment is being used (e.g. non-entry rescue tripod, etc.) and/or rescue team?

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Appendix A: Sample Confined Space Permit Form Contd.

 Confined Space Entry Permit			No.
  			
If no, why? Air monitoring equipment required? Air monitoring equipment calibrated? If no, why? Hot Work Permit active? If no, why?	If no, why? If yes, specify what type respirators are being worn? Respirator Type - Other All attendant(s)/entrant(s) wearing personal protective equipment (PPE)? If no, why?	If no, why? Area barricaded to prevent unauthorized access? If no, why?	
Close-Out Checklist			
Tools (power and/or hand) removed from the space(s)		If no, why?	
All air monitor(s) removed from the space(s)?		If no, why?	
All entrant(s) removed from the space(s) and accounted for?		If no, why?	
All attendant(s)' and entrant(s)' personal locks removed from LO/TO?		If no, why?	
Hot Work Permit closed?		If no, why?	
Area barricade(s) removed and/or space opening closed?		If no, why?	
Entry Supervisor Acknowledgment			
☐ By signing below, I confirm that this confined space entry permit is closed and that I have exercised due diligence to ensure that the aforementioned checklist items are true and complete.			
ENTRY SUPERVISOR (First & Last Name):		Entry Supervisor Signature Date:	

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Purpose

Overhead cranes, hoists, and rigging equipment are used by Company employees for lifting and moving materials. In order to maintain a safe workplace for its employees and comply with new regulations, only qualified individuals shall operate these devices. This program outlines the procedures for safe operations and the training requirements regarding overhead cranes, hoists and rigging equipment.

Scope

Applies to all Company employees who operate overhead cranes, hoists, and rigging equipment in the scope of their job duties and assignments. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

A/D director (Assembly/Disassembly director) means an individual who meets this subpart's requirements for an A/D director, irrespective of the person's formal job title or whether the person is non-management or management personnel.

ANSI - the American National Standards Institute.

Appointed - assigned specific responsibilities by the employer or the employer's representative.

Articulating crane means a crane whose boom consists of a series of folding, pin connected structural members, typically manipulated to extend or retract by power from hydraulic cylinders.

Assembly/Disassembly means the assembly and/or disassembly of equipment covered under this standard. With regard to tower cranes, "erecting and climbing" replaces the term "assembly," and "dismantling" replaces the term "disassembly." Regardless of whether the crane is initially erected to its full height or is climbed in stages, the process of increasing the height of the crane is an erection process.

Assist crane means a crane used to assist in assembling or disassembling a crane.

Attachments means any device that expands the range of tasks that can be done by the equipment. Examples include, but are not limited to: an auger, drill, magnet, pile-driver, and boom-attached personnel platform.

Audible signal means a signal made by a distinct sound or series of sounds. Examples include, but are not limited to, sounds made by a bell, horn, or whistle.

Auxiliary hoist - a supplemental hoisting unit of lighter capacity and usually higher speed than provided for the main hoist.

Blocking (also referred to as "cribbing") is wood or other material used to support equipment or a component and distribute loads to the ground. It is typically used to support lattice boom sections during assembly/ disassembly and under outrigger and stabilizer floats.

Boatswain's chair means a single-point adjustable suspension scaffold consisting of a seat or sling (which may be incorporated into a full body harness) designed to support one employee in a sitting position.

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Bogie means “travel bogie,” which is defined below.

Boom (equipment other than tower crane) means an inclined spar, strut, or other long structural member which supports the upper hoisting tackle on a crane or derrick. Typically, the length and vertical angle of the boom can be varied to achieve increased height or height and reach when lifting loads. Booms can usually be grouped into general categories of hydraulically extendible, cantilevered type, latticed section, cable supported type or articulating type.

Boom (tower cranes): On tower cranes, if the “boom” (i.e., principal horizontal structure) is fixed, it is referred to as a jib; if it is moveable up and down, it is referred to as a boom.

Boom angle indicator means a device which measures the angle of the boom relative to horizontal.

Boom hoist limiting device includes boom hoist disengaging device, boom hoist shutoff, boom hoist disconnect, boom hoist hydraulic relief, boom hoist kick-outs, automatic boom stop device, or derricking limiter. This type of device disengages boom hoist power when the boom reaches a predetermined operating angle. It also sets brakes or closes valves to prevent the boom from lowering after power is disengaged.

Boom length indicator indicates the length of the permanent part of the boom (such as ruled markings on the boom) or, as in some computerized systems, the length of the boom with extensions/attachments.

Boom stop includes boom stops, (belly straps with struts/standoff), telescoping boom stops, attachment boom stops, and backstops. These devices restrict the boom from moving above a certain maximum angle and toppling over backward.

Boom suspension system means a system of pendants, running ropes, sheaves, and other hardware which supports the boom tip and controls the boom angle.

Brake - a device used for retarding or stopping motion by friction or power means.

Bridge - that part of a crane consisting of girders, trucks, end ties, foot-walks, and drive mechanism that carries the trolley or trolleys.

Bridge travel - the crane movement in a direction parallel to the crane runway.

Builder means the builder/constructor of equipment.

Bumper [buffer] - an energy absorbing device for reducing impact when a moving crane or trolley reaches the end of its permitted travel; or when two moving cranes or trolleys come in contact.

Center of gravity: The center of gravity of any object is the point in the object around which its weight is evenly distributed. If you could put a support under that point, you could balance the object on the support.

Certified welder means a welder who meets nationally recognized certification requirements applicable to the task being performed.

Climbing means the process in which a tower crane is raised to a new working height, either by adding additional tower sections to the top of the crane (top climbing), or by a system in which the entire crane is raised inside the structure (inside climbing).

Come-a-long means a mechanical device typically consisting of a chain or cable attached at each end that is used to facilitate movement of materials through leverage.

Competent person means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions

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which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Controlled load lowering means lowering a load by means of a mechanical hoist drum device that allows a hoisted load to be lowered with maximum control using the gear train or hydraulic components of the hoist mechanism. Controlled load lowering requires the use of the hoist drive motor, rather than the load hoist brake, to lower the load.

Controlling entity means an employer that is a prime contractor, general contractor, construction manager or any other legal entity which has the overall responsibility for the construction of the project – its planning, quality and completion.

Counterweight means a weight used to supplement the weight of equipment in providing stability for lifting loads by counterbalancing those loads.

Crane - a machine for lifting and lowering a load and moving it horizontally, with the hoisting mechanism an integral part of the machine. Cranes, whether fixed or mobile, are driven manually or by power.

Crane/derrick includes all equipment covered by this subpart.

Crawler crane means equipment that has a type of base mounting which incorporates a continuous belt of sprocket driven track.

Crossover points means locations on a wire rope which is spooled on a drum where one layer of rope climbs up on and crosses over the previous layer. This takes place at each flange of the drum as the rope is spooled onto the drum, reaches the flange, and begins to wrap back in the opposite direction.

Dedicated channel means a line of communication assigned by the employer who controls the communication system to only one signal person and crane/derrick or to a coordinated group of cranes/derricks/signal person(s).

Dedicated pile-driver is a machine that is designed to function exclusively as a pile driver. These machines typically have the ability to both hoist the material that will be pile-driven and to pile-drive that material.

Dedicated spotter (power lines): To be considered a dedicated spotter, the requirements of § 1926.1428 (Signal person qualifications) must be met and his/her sole responsibility is to watch the separation between the power line and: the equipment, load line and load (including rigging and lifting accessories), and ensure through communication with the operator that the applicable minimum approach distance is not breached.

Designated - selected or assigned by the employer or the employer's representative as being qualified to perform specific duties.

Directly under the load means a part or all of an employee is directly beneath the load.

Dismantling includes partial dismantling (such as dismantling to shorten a boom or substitute a different component).

Drum - the cylindrical member around which the ropes are wound for raising or lowering the load.

Drum rotation indicator means a device on a crane or hoist which indicates in which direction and at what relative speed a particular hoist drum is turning.

Electrical contact occurs when a person, object, or equipment makes contact or comes in close proximity with an energized conductor or equipment that allows the passage of current.

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Emergency stop switch - a manually or automatically operated electric switch to cut off electric power independently of the regular operating controls.

Employer-made equipment means floating cranes/derricks designed and built by an employer for the employer's own use.

Encroachment is where any part of the crane, load line or load (including rigging and lifting accessories) breaches a minimum clearance distance that this subpart requires to be maintained from a power line.

Equipment criteria means instructions, recommendations, limitations and specifications.

Equipment means equipment covered by this subpart.

Fall protection equipment means guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems.

Fall restraint system means a fall protection system that prevents the user from falling any distance. The system is comprised of either a body belt or body harness, along with an anchorage, connectors and other necessary equipment. The other components typically include a lanyard, and may also include a lifeline and other devices.

Fall zone means the area (including but not limited to the area directly beneath the load) in which it is reasonably foreseeable that partially or completely suspended materials could fall in the event of an accident.

Flange points are points of contact between rope and drum flange where the rope changes layers.

Floating cranes/derricks means equipment designed by the manufacturer (or employer) for marine use by permanent attachment to a barge, pontoons, vessel or other means of flotation.

Floor-operated crane - a crane which is pendant or nonconductive rope controlled by an operator on the floor or an independent platform.

Free fall (of the load line) means that only the brake is used to regulate the descent of the load line (the drive mechanism is not used to drive the load down faster or retard its lowering).

Free surface effect is the uncontrolled transverse movement of liquids in compartments which reduce a vessel's transverse stability.

Hoist - an apparatus that may be a part of a crane, exerting a force for lifting or lowering. It is a mechanical device for lifting and lowering loads by winding a line onto or off a drum.

Hoisting is the act of raising, lowering or otherwise moving a load in the air with equipment covered by this standard. As used in this standard, "hoisting" can be done by means other than wire rope/ hoist drum equipment.

Holding brake - a brake that automatically prevents motion when power is off.

Insulating link/device means an insulating device listed, labeled, or accepted by a Nationally Recognized Testing Laboratory in accordance with 29 CFR 1912.7.

Jib stop (also referred to as a jib backstop), is the same type of device as a boom stop but is for a fixed or luffing jib.

Land crane/derrick is equipment not originally designed by the manufacturer for marine use by permanent attachment to

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barges, pontoons, vessels, or other means of floatation.

Limit switch - a switch that is operated by some part or motion of a power-driven machine or equipment to alter the electric circuit associated with the machine or equipment.

List means the angle of inclination about the longitudinal axis of a barge, pontoons, vessel or other means of floatation.

Load - the total superimposed weight on the load block or hook.

Load block - the assembly of hook or shackle, swivel, bearing, sheaves, pins, and frame suspended by the hoisting rope.

Load moment (or rated capacity) indicator means a system which aids the equipment operator by sensing (directly or indirectly) the overturning moment on the equipment, i.e., load multiplied by radius. It compares this lifting condition to the equipment's rated capacity, and indicates to the operator the percentage of capacity at which the equipment is working. Lights, bells, or buzzers may be incorporated as a warning of an approaching overload condition.

Load moment (or rated capacity) limiter means a system which aids the equipment operator by sensing (directly or indirectly) the overturning moment on the equipment, i.e., load multiplied by radius. It compares this lifting condition to the equipment's rated capacity, and when the rated capacity is reached, it shuts off power to those equipment functions which can increase the severity of loading on the equipment, e.g., hoisting, telescoping out, or luffing out. Typically, those functions which decrease the severity of loading on the equipment remain operational, e.g., lowering, telescoping in, or luffing in.

Load refers to the object(s) being hoisted and/or the weight of the object(s); both uses refer to the object(s) and the load- attaching equipment, such as, the load block, ropes, slings, shackles, and any other ancillary attachment.

Locomotive crane means a crane mounted on a base or car equipped for travel on a railroad track.

Luffing jib limiting device is similar to a boom hoist limiting device, except that it limits the movement of the luffing jib.

Main hoist - the hoist mechanism provided for lifting the maximum rated load.

Main switch - a switch controlling the entire power supply to the crane.

Marine hoisted personnel transfer device means a device, such as a "transfer net," that is designed to protect the employees being hoisted during a marine transfer and to facilitate rapid entry into and exit from the device. Such devices do not include boatswain's chairs when hoisted by equipment covered by this standard.

Marine worksite means a construction worksite located in, on or above the water.

Mobile crane means a lifting device incorporating a cable suspended latticed boom or hydraulic telescopic boom designed to be moved between operating locations by transport over the road.

Moving point-to-point means the times during which an employee is in the process of going to or from a work station.

Multi-purpose machine means a machine that is designed to be configured in various ways, at least one of which allows it to hoist (by means of a winch or hook) and horizontally move a suspended load. For example, a machine that can rotate and can be configured with removable forks/tongs (for use as a forklift) or with a winch pack, jib (with a hook at the end) or jib used in conjunction with a winch. When configured with the forks/tongs, it is not covered by this subpart. When configured with a winch pack, jib (with a hook

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at the end) or jib used in conjunction with a winch, it is covered by this subpart.

Nationally recognized accrediting agency is an organization that, due to its independence and expertise, is widely recognized as competent to accredit testing organizations. Examples of such accrediting agencies include, but are not limited to, the National Commission for Certifying Agencies and the American National Standards Institute.

Nonconductive means that, because of the nature and condition of the materials used, and the conditions of use (including environmental conditions and condition of the material), the object in question has the property of not becoming energized (that is, it has high dielectric properties offering a high resistance to the passage of current under the conditions of use).

Operational aids are devices that assist the operator in the safe operation of the crane by providing information or automatically taking control of a crane function. These include, but are not limited to, the devices listed in § 1926.1416 ("listed operational aids").

Operational controls means levers, switches, pedals and other devices for controlling equipment operation.

Operator means a person who is operating the equipment.

Overhead and gantry cranes includes overhead/bridge cranes, semi-gantry, cantilever gantry, wall cranes, storage bridge cranes, launching gantry cranes, and similar equipment, irrespective of whether it travels on tracks, wheels, or other means.

Overhead crane - a crane with a movable bridge carrying a movable or fixed hoisting mechanism and traveling on an overhead fixed runway structure.

Pendants includes both wire and bar types. Wire type: a fixed length of wire rope with mechanical fittings at both ends for pinning segments of wire rope together. Bar type: instead of wire rope, a bar is used. Pendants are typically used in a latticed boom crane system to easily change the length of the boom suspension system without completely changing the rope on the drum when the boom length is increased or decreased.

Personal fall arrest system means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body harness and may include a lanyard, deceleration device, lifeline, or suitable combination of these.

Portal crane is a type of crane consisting of a rotating upperstructure, hoist machinery, and boom mounted on top of a structural gantry which may be fixed in one location or have travel capability. The gantry legs or columns usually have portal openings in between to allow passage of traffic beneath the gantry.

Power lines means electric transmission and distribution lines.

Proximity alarm is a device that provides a warning of proximity to a power line and that has been listed, labeled, or accepted by a Nationally Recognized Testing Laboratory in accordance with 29 CFR 1910.7.

Qualified evaluator (not a third party) means a person employed by the signal person's employer who has demonstrated that he/she is competent in accurately assessing whether individuals meet the Qualification Requirements in this subpart for a signal person.

Qualified evaluator (third party) means an entity that, due to its independence and expertise, has demonstrated that it is competent in accurately assessing whether individuals meet the Qualification Requirements in this subpart for a signal person.

Qualified person means a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive

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knowledge, training and experience, successfully demonstrated the ability to solve/resolve problems relating to the subject matter, the work, or the project.

Qualified rigger is a rigger who meets the criteria for a qualified person.

Range control limit device is a device that can be set by an equipment operator to limit movement of the boom or jib tip to a plane or multiple planes.

Range control warning device is a device that can be set by an equipment operator to warn that the boom or jib tip is at a plane or multiple planes.

Rated capacity indicator: See load moment indicator.

Rated capacity limiter: See load moment limiter.

Rated capacity means the maximum working load permitted by the manufacturer under specified working conditions. Such working conditions typically include a specific combination of factors such as equipment configuration, radii, boom length, and other parameters of use.

Rated load - the maximum load for which a crane or individual hoist is designed and built by the manufacturer and shown on the equipment nameplate(s).

Repetitive pickup points refer to, when operating on a short cycle operation, the rope being used on a single layer and being spooled repetitively over a short portion of the drum.

Rope refers to wire rope, unless otherwise specified.

Running wire rope means a wire rope that moves over sheaves or drums.

Runway - an assembly of rails, beams, girders, brackets, and framework on which the crane or trolley travels.

Runway means a firm, level surface designed, prepared and designated as a path of travel for the weight and configuration of the crane being used to lift and travel with the crane suspended platform. An existing surface may be used as long as it meets these criteria.

Section means a section of this subpart, unless otherwise specified.

Side pull - that portion of the hoist pull acting horizontally when the hoist lines are not operated vertically.

Sideboom crane means a track-type or wheel-type tractor having a boom mounted on the side of the tractor, used for lifting, lowering or transporting a load suspended on the load hook. The boom or hook can be lifted or lowered in a vertical direction only.

Span - the horizontal distance center to center of runway rails.

Special hazard warnings means warnings of site-specific hazards (for example, proximity of power lines).

Stability (flotation device) means the tendency of a barge, pontoons, vessel or other means of flotation to return to an upright position after having been inclined by an external force.

Standard Method means the protocol in Appendix A of this subpart for hand signals.

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Standby crane - a crane which is not in regular service but which is used occasionally or intermittently as required.

Stop - a device to limit travel of a trolley or crane bridge. This device normally is attached to a fixed structure and normally does not have energy absorbing ability.

Superstructure: See Upperworks.

Tagline means a rope (usually fiber) attached to a lifted load for purposes of controlling load spinning and pendular motions or used to stabilize a bucket or magnet during material handling operations.

Tender means an individual responsible for monitoring and communicating with a diver.

Tilt up or tilt down operation means raising/lowering a load from the horizontal to vertical or vertical to horizontal.

Tower crane is a type of lifting structure which utilizes a vertical mast or tower to support a working boom (jib) in an elevated position. Loads are suspended from the working boom. While the working boom may be of the fixed type (horizontal or angled) or have luffing capability, it can always rotate to swing loads, either by rotating on the top of the tower (top slewing) or by the rotation of the tower (bottom slewing). The tower base may be fixed in one location or ballasted and moveable between locations. Mobile cranes that are configured with luffing jib and/or tower attachments are not considered tower cranes under this section.

Travel bogie (tower cranes) is an assembly of two or more axles arranged to permit vertical wheel displacement and equalize the loading on the wheels.

Trim means angle of inclination about the transverse axis of a barge, pontoons, vessel or other means of floatation.

Trolley - the unit that travels on the bridge rails and carries the hoisting mechanism.

Trolley travel - the trolley movement at right angles to the crane runway.

Two blocking means a condition in which a component that is uppermost on the hoist line such as the load block, hook block, overhaul ball, or similar component, comes in contact with the boom tip, fixed upper block or similar component. This binds the system and continued application of power can cause failure of the hoist rope or other component.

Upperstructure: See Upperworks.

Upperworks means the revolving frame of equipment on which the operating machinery (and many cases the engine) are mounted along with the operator's cab. The counterweight is typically supported on the rear of the upperstructure and the boom or other front end attachment is mounted on the front.

Wall crane - a crane having a jib with or without trolley and supported from a sidewall or line of columns of a building. It is a traveling type and operates on a runway attached to the sidewall or columns.

Wire rope means a flexible rope constructed by laying steel wires into various patterns of multi-wired strands around a core system to produce a helically wound rope.

What is Not Defined as a Crane:

- Forklifts, Track Loaders, Excavators (Track Hoe/Backhoe), Concrete Pump Trucks w/boom
- Power Shovels, Digger Derricks, Tow Trucks, Vehicle Mounted Work Platforms
- Self-propelled Elevating Work Platforms, Stacker Cranes, Mechanic's Trucks With Hoisting Devices

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- Come-A-Longs and Chain Falls, Gin Poles For Communication Tower Work
 - Tree Trimming and tree removal work
- Anchor handling with a vessel or barge using an affixed A-frame

Key Responsibilities

Managers and Supervisors

- Are responsible to ensure that employees and contractors are trained and qualified on the proper operations and have been trained in crane and hoistsafety.
- Shall ensure modifications or additions that may affect the capacity or safe operation of the equipment must not be made without written approval from the manufacturer or approval from a registered professional engineer. The manufacturer must approve all modifications/additions in writing. A registered professional engineer must be qualified with respect to the equipment involved and must ensure the original safety factor of the equipment is notreduced.
- Shall ensure all manufacturer procedures applicable to the operational function of equipment must be complied with. All manufacturer procedures applicable to the operational functions of equipment, including its use with attachments, must be compliedwith.
- Are responsible to see that all provisions of this program are followed and that crane inspections are performed and the equipment is in safe operatingcondition.
- Are responsible for identifying hazard areas by marking the boundaries of the crane swing radius with warning lines, railings or similar barriers or other safety measures to be used when the equipment has the potential to strike and injure an employee or pinch/crush an employee against any other object.

Employees

- Employee operators are responsible to follow the requirements of this program and report any damage or needed repairs immediately to theirsupervisor.
- Operators must meet the physical qualifications, pass a physical, a written examination, understand and be able to use a load chart as well as calculate loads for the crane type operated.
-
- Employees designated as crane operators are responsible for the entire lift. In addition, crane operators are responsible to:
 - Make the required inspections,
 - Ensure that the crane is maintained,
 - Ensure that all personnel working in the area around the crane are kept clear of all hazards related to crane operations.
 - Determine the weights, and correct rigging required for loads to be lifted.

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Crane Operator Certification/Qualification

Operators must be determined to be qualified before they are permitted to operate any crane. Only those employees qualified by training or experience shall be allowed to operate equipment and machinery.

Within 4 years of November 8th 2010 COMPANY must ensure operators must be qualified/certified by one of the following methods:

Certification by an Accredited Crane Operator Testing Organization

- Accredited by a nationally recognized accrediting agency
- Certification is portable
- Valid for five years
- Program must be reviewed by a nationally recognized accrediting agency every three years

Qualification by an Audited Employer Program

- Developed or approved by an auditor certified by an accredited crane operator testing organization
- Auditor is not an employee of COMPANY
- Tests should be administered per nationally recognized test administration standards
- Program shall be audited within the first three months, then once every three years
- Qualification is not portable and valid for five years

Qualification by the U.S. Military Licensing by

a Government Entity

- Must meet or exceed requirements of the OSHA standard
- Valid only within the jurisdiction of the government entity
- Valid for time specified by the government entity, but no longer than five years

Certification/Qualification Criteria

Pass written test that include:

- Controls and operational performance
- Ability to calculate the load/capacity
- Procedures for power line contact
- Site preparation
- Ability to read manuals/charts relevant to the equipment being operated

Pass practical examination

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- Ability to perform a pre-shift inspection
- Operational and maneuvering skills
- Application of load chart information
- Application of safe shut down and securing procedures

Administrative Criteria

- COMPANY must revoke operator’s certification if they have reason to believe the employee is not qualified to operate.
- The current training records must be on file during the operator’s employment.

Rigger Qualifications

Riggers assemble, rig, hook and unhook, guide, and disassemble crane equipment and materials. Riggers must meet the requirements of a qualified person. A qualified rigger is a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to resolve problems relating to the subject matter, the work, or the project.

Riggers must be trained in all the requirements of the regulations that apply to their respective roles. For example, riggers must be trained and qualified to perform assembly and disassembly operations when their job tasks require them to perform such operations.

Signal Person Qualification

All signal persons must be qualified to give signals. In order to be qualified, the signal person must:

- Know and understand the type of signals used; if hand signals are used, the signal person must know and understand the Standard Method for handsignals.
- Be competent in the application of the type of signals used.
- Have a basic understanding of equipment operation and limitations, including the crane dynamics involved in swinging and stopping loads and boom deflection from hoisting loads.
- Know and understand the regulatory requirements for signals (29 CFR 1926.1419 to 1926.1422) and the signal person qualifications (29 CFR1926.1428).
- Demonstrate that he or she meets the qualification requirements for signalers through an oral or written test and through a practical test.

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Signal Person Evaluations

The qualification of signal persons must be evaluated and documented by either:

- A third party qualified evaluator, *or*
- The employer’s qualified evaluator (i.e., an employee competent in accurately assessing whether the signaler has met the qualification requirements)
-

Signal Person Refresher Training

If subsequent actions by the signal person indicate that the individual does not meet the Qualification Requirements, the Company must not allow the individual to continue working as a signal person until retraining is provided and a reassessment is made that confirms that the individual meets the Qualification Requirements.

Documentation of Signaler Qualification

The Company must make the documentation for whichever option is used available at the site while the signal person is employed by the Company. The documentation must specify each type of signaling (e.g. Hand signals, radio

signals) for which the signal person meets the requirements of the rule.



Authority to Stop Operations

The operator has the authority to stop and refuse to handle loads whenever there is a safety concern. Whenever there is a safety concern, the operator must have the authority to stop and refuse to handle loads until a qualified person has determined that safety has been assured.

Ground Conditions

Cranes must not be used unless ground conditions are able to support the equipment and any supporting materials per the manufacturer’s specifications. COMPANY (controlling entity) will ensure that equipment must not be assembled or used unless ground conditions are firm, drained and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer’s specifications for adequate support and degree of level of the equipment are met.

COMPANY will locate all hazards that are identified in all available documents and inform the crane user of them.

Overhead Power Lines in Crane Operations

- No part of crane, line or load may be able to reach within 20 feet of a power line during setup. Exceptions: de- energized

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- and grounded power lines or use of a dedicated spotter or proximity alarms.
- Assembly/disassembly below power lines is prohibited, unless line is de-energized and grounded.
 - All power lines are presumed to be energized unless confirmed to be de-energized by the utility owner/operator and visibly grounded at the worksite.
 - All power lines presumed to be un-insulated.
 - Employees shall understand limitations of insulating links, proximity alarms and range control devices, if used.
 - Dedicated spotters shall be trained.
 - There must be at least one electrocution hazard warning sticker conspicuously placed in the cab of the crane.

Powerlines

A pre-operation hazard assessment will be performed to identify the work zone and determine if any part of the equipment could reach closer than 20 feet to a power line. The work zone shall be identified by demarcating boundaries such as flag and range limiting devices, or defining the work zone as 360 degrees around the equipment up to the maximum working radius. The hazard assessment must determine if any part of the equipment could get closer than 20 feet to a powerline.

Measures must be taken if it is determined that any part of the equipment, load line or load could get closer than 20 feet to a power line. If it is determined that any part of the equipment, load line or load could get closer than 20 feet to a power line then at least one of the following measures must be taken:

- Ensure the power lines have been deenergized and visibly grounded
- Ensure no part of the equipment, load line or load gets closer than 20 feet to the power line
- Determine the line's voltage and minimum approach distance permitted in Table A (below).

Voltage (kv)	Minimum Clearance Distance(feet)
Up to 50	10
50 to 200	15
200 to 350	20
350 to 500	25
500 to 750	35
750 to 1000	45
Over 1000	As established by the line owner

Some special requirements for working below power lines include training of operators and crew on:

- Procedures to follow after power line contact
- Danger of a potential energized zone
- Operator's emergency procedures
- Safest means to evacuate equipment
- Need for employees to avoid approach
- Safe clearance from power lines

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Required Equipment

Mandatory Safety Devices Equipment

All safety devices must be in proper working order before operation begins. Safety devices are required to be on all equipment and must be in proper working order before operations begin. If any of the devices are not in proper working order the equipment must be taken out of service and operations must not resume until the device is working properly again. The following is mandatory equipment:

- Crane level indicator
- Boom stops
- Jib stops
- Locks for foot pedal brakes
- Horns
- Integral check valves for hydraulic outriggers
- Rail clamps and stops for equipment on rails

The following required equipment must be in service except where specified temporary alternative measures are met:

- Boom hoist limiting device
- Luffing jib limiting device
- Anti two-block device (cranes manufactured after 2/28/92) Exception: lattice booms used for dragline, clam shell, scrap magnet, drop ball, marine operations and pile driving work
- Boom angle or radius indicator
- Jib angle indicator (luffing jibs)
- Boom length indicator (telescopic booms)
- Load weighing devices (load moment indicators, rated capacity indicators or rated capacity limiters – cranes manufactured after 3/29/03)
- Outrigger position indicators (cranes manufactured after 1/1/08)
- Hoist drum rotation indicator (if drum is not visible to operator)

An accessible fire extinguisher of 5BC rating, or higher, shall be available at all operator stations or cabs of equipment.

Procedures applicable to the operation of the equipment must be readily available in the cab at all times. The operator shall have access to procedures applicable to the operation of the equipment. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.

If the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block and this marking shall be clearly legible from the ground floor.

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Whenever internal combustion engine powered equipment exhausts in enclosed spaces, test shall be made and recorded to see that employees are not exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres.

Material Hoists, Personnel Hoists and Elevators

General Requirements

Hoist Specifications

All material hoists must conform to the requirements of ANSI/ASME A10.5-1969, Safety Requirements for Material Hoists. Note: ANSI/ASME have updated this standard; however, OSHA allows COMPANY to follow the updated consensus standard without penalty when it provides equal or greater employee protection.

The Company must comply with the manufacturer's specifications and limitations for the operation of all hoists and elevators. Where manufacturer's specifications are not available, a professional engineer competent in the field must determine the limitations assigned to the equipment.

Rated load capacities, recommended operating speeds, and special hazard warnings or instructions must be posted on cars and platforms.

Wire Rope

Hoisting ropes must be installed in accordance with the wire rope manufacturer's recommendations. Wire rope must be removed from service when any of the following conditions exists:

- In hoisting ropes, six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay
- Abrasion, scrubbing, flattening, or peening, causing loss of more than one-third of the original diameter of the outside wires
- Evidence of any heat damage resulting from a torch or any damage caused by contact with electrical wires
- Reduction from nominal diameter of more than three sixty-fourths in. For diameters up to and including three- fourths in.; one-sixteenth in. For diameters seven-eighths to 11/8.in.; and three thirty-seconds in. For diameters one and one-quarter in. To one and one-half.in.

Prohibited Operations

The installation of live booms on hoists and the use of endless belt-type man lifts are prohibited.

The manufacturer's instructions, procedures and prohibitions must be followed and complied with when assembling and/or disassembling equipment.

Material Hoists

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Operating rules must be established and posted at the operator's station of the hoist. Such rules must include signal system and allowable line speed for various loads. Rules and notices must be posted on the car frame or crosshead in a conspicuous location, including the statement "No Riders Allowed." No person must be allowed to ride on material hoists except for the purposes of inspection and maintenance.

Protective Gates, Bars, and Coverings

All entrances of the hoistways must be protected by substantial gates or bars, which must guard the full width of the landing entrance. All hoistway entrance bars and gates must be painted with diagonal contrasting colors, such as black and yellow stripes.

Bars must be not less than 2- by 4-in. Wooden bars or the equivalent, located 2 ft. From the hoistway line. Bars must be located neither less than 36 in. Nor more than 42 in. Above the floor. Gates or bars protecting the entrances to hoistways must be equipped with a latching device.

Overhead protective covering of 2-in. Planking, 3/4-inch plywood, or other solid material of equivalent strength must be provided on the top of every material hoist cage or platform.

The operator's station of a hoisting machine must be provided with overhead protection equivalent to tight planking not less than 2 in. Thick. The support for the overhead protection must be of equal strength.

Hoist Towers

All material hoist towers must be designed by a licensed professional engineer. Hoist towers may be used with or without an enclosure on all sides. Whichever alternative is chosen, the following applicable conditions must be met:

- When a hoist tower is enclosed, it must be enclosed on all sides for its entire height with a screen enclosure of 1/2-in. Mesh, No. 18 U.S. gauge wire or equivalent, except for landing access.
- When a hoist tower is not enclosed, the hoist platform or car must be totally enclosed (caged) on all sides for the full height between the floor and the overhead protective covering with 1/2-in. Mesh of No. 14 U.S. gauge wire or equivalent. The hoist platform enclosure must include the required gates for loading and unloading. A 6-ft-high enclosure must be provided on the unused sides of the hoist tower at ground level.

Car-arresting devices must be installed to function in case of rope failure.

Personnel Hoists

Specifications

All personnel hoists used by employees must be constructed of materials and components that meet the specifications for materials, construction, safety devices, assembly, and structural integrity as stated in the ANSI/ASME A10.4-1963, Safety Requirements for Workmen's Hoists. ANSI/ASME have updated this standard; however, OSHA allows COMPANY to follow the updated consensus standard without penalty when it provides equal or greater employee protection.

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Hoist Towers

Hoist towers outside the structure must be enclosed for the full height on the side or sides used for entrance and exit to the structure. At the lowest landing, the enclosure on the sides not used for exit or entrance to the structure must be enclosed to a height of at least 10 ft. Other sides of the tower adjacent to floors or scaffold platforms must be enclosed to a height of 10 ft. Above the level of such floors or scaffolds. Towers inside of structures must be enclosed on all four sides throughout the full height. Towers must be anchored to the structure at intervals not exceeding 25 ft. In addition to tie-ins, a series of guys must be installed. Where tie-ins are not practical, the tower must be anchored by means of guys made of wire rope at least one-half in. in diameter, securely fastened to anchorage to ensure stability.

Hoistway Doors and Gates

Hoistway doors or gates must be not less than 6 ft. 6 in. High and must be provided with mechanical locks that cannot be operated from the landing side, and must be accessible only to persons on the car. A door or gate must be provided at each entrance to the car, which must protect the full width and height of the car entrance. Doors or gates must be provided with electrical contacts that do not allow movement of the hoist when door or gate is open.

Cars

Cars must be permanently enclosed on all sides and the top, except sides used for entrance and exit that have car gates or doors. Safeties must be capable of stopping and holding the car and rated load when traveling at governor tripping speed. Cars must be provided with a capacity and data plate secured in a conspicuous place on the car or crosshead. An emergency stop switch must be provided in the car and marked "Stop."

Covering

Overhead protective covering of 2-in. Planking, 3/4-in. Plywood, or other solid material or equivalent strength must be provided on the top of every personnel hoist.

Engine Prohibition

Internal combustion engines must not be permitted for direct drive.

Stopping Device

Normal and final terminal stopping devices must be provided.

Ropes

The minimum number of hoisting ropes used must be three for traction hoists and two for drum-type hoists. The minimum diameter of hoisting and counterweight wire ropes must be 1/2 in. Following are the minimum safety factors for suspension wire ropes:

Rope speed (feet per minute)

Minimum factor of safety

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50	7.60
75	7.75
100	7.95
125	8.10
150	8.25
600	10.70

See the chart at 29 CFR 1926.552(c)(14) for additional safety factors.

Personnel Hoists Used in Bridge Tower Construction

Such hoists must be approved by a registered professional engineer and erected under the supervision of a qualified engineer competent in this field.

When a hoist tower is not enclosed, the hoist platform or car must be totally enclosed (caged) on all sides for the full height between the floor and the overhead protective covering with 3/4-in. Mesh of No. 14 U.S. gauge wire or equivalent. The hoist platform enclosure must include the required gates for loading and unloading.

These hoists must be inspected and maintained on a weekly basis. Whenever the hoisting equipment is exposed to winds exceeding 35 miles per hour, it must be inspected and put in operable condition before reuse.

Wire rope must be taken out of service when any of the following conditions exist:

- In running ropes, six randomly distributed broken wires in one lay or three broken wires in one strand in one lay
- Wear of one-third the original diameter of outside individual wires
- Kinking, crushing, bird caging, or any other damage resulting in distortion of the rope structure
- Evidence of any heat damage from any cause
- Reductions from nominal diameter of more than three sixty-fourths in. For diameters to and including three- fourths in., one-sixteenth in. For diameters seven-eighths in. To 11/8 in. Inclusive, three thirty- seconds in. For diameters 11/4 to 11/2 in. Inclusive
- In standing ropes, more than two broken wires in one lay in sections beyond end connections or more than one broken wire at an end connection.

Elevators

Permanent elevators under the care and custody of the Company and used by employees for work covered by this Act must comply with the requirements of ANSI/ASME A17.1-1965 with addenda A17.1a- 1967, A17.1b-1968, A17.1c-1969, A17.1d-1970, and inspected in accordance with A17.2-1960 with addenda A17.2a-1965 and A17.2b- 1967. ANSI/ASME have updated these standards; however, OSHA allows the Company to follow the updated consensus standards without penalty when they provide equal or greater employee protection.

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Base-Mounted Dum Hoists

Specifications

All base-mounted drum hoists in use must meet the applicable requirements for design, construction, installation, testing, inspection, maintenance, and operations, as prescribed by the manufacturer.

COMPANY must ensure that exposed moving parts such as gears, projecting screws, setscrews, chain, cables, chain sprockets, and reciprocating or rotating parts that constitute a hazard are guarded.

All controls used during the normal operation cycle must be located within easy reach of the operator's station.

Electric Motor-Operated Hoists

Electric motor-operated hoists must be provided with:

- A device to disconnect all motors from the line upon power failure and not permit any motor to be restarted until the controller handle is brought to the "off" position
- Where applicable, an over-speed preventivedevice
- A means whereby remotely operated hoists stop when any control is ineffective

Overhead Hoists

All overhead hoists in use must meet the applicable requirements for construction, design, installation, testing, inspection, maintenance, and operation, as prescribed by the manufacturer.

The safe working load of the overhead hoist, as determined by the manufacturer, must be indicated on the hoist, and this safe working load must not be exceeded.

The supporting structure to which the hoist is attached must have a safe working load equal to that of the hoist. The support must be arranged so as to provide for free movement of the hoist and must not restrict the hoist from lining itself up with the load.

The hoist must be installed only in locations that will permit the operator to stand clear of the load at all times.

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Air hoists must be connected to an air supply of sufficient capacity and pressure to safely operate the hoist. All air hoses supplying air must be positively connected to prevent disconnected during use.

Conveyors

Specifications

All conveyors in use must meet the applicable requirements for design, construction, inspection, testing, maintenance, and operation, as prescribed in the ANSI/ASME B20.1-1957, Safety Code for Conveyors, Cableways, and Related Equipment. ANSI/ASME have updated this standard; however, OSHA allows the Company to follow updated consensus standards without penalty when they provide equal or greater employee protection.

Means for stopping the motor or engine must be provided at the operator's station. Conveyor systems must be equipped with an audible warning signal to be sounded immediately before starting up the conveyor. If the operator's station is at a remote point, similar provisions for stopping the motor or engine must be provided at the motor or engine location.

Emergency stop switches must be arranged so that the conveyor cannot be started again until the actuating stop switch has been reset to running or "on" position.

Guards

Screw conveyors must be guarded to prevent employee contact with turning flights. Where a conveyor passes over work areas, aisles, or thoroughfares, suitable guards must be provided to protect employees required to work below the conveyors.

Marking and Lockout/Tagout

All crossovers, aisles, and passageways must be conspicuously marked by suitable signs (see 29 CFR 1926.200). Conveyors must be locked out, or otherwise rendered inoperable, and tagged out with a "Do Not Operate" tag during repairs and when operation is hazardous to employees performing maintenance work.

Rigging Practices

Major incidents involving rigging operations are caused by:

- The failure of equipment from overloading, incorrect assembly or disassembly, or lack of proper maintenance;
- Dropped or falling loads, usually as a result of the misuse or malfunction of hoisting lines and rigging; and
- Lack of safeguards, especially in proximity to high-voltage lines. Training is key in minimizing the risk of incidents

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An important element of the COMPANY material handling program is proper rigging practices. Rigging of loads must be done with relative precision and performed by trained, experienced personnel. To ensure that safe practices are followed, a competent and qualified person must direct the assembly/disassembly of equipment. The assembly/disassembly of equipment must be directed by a competent and qualified person to see that:

- Rigging equipment that has the necessary capacity to do the job is available.
- Rigging equipment is in a safe working condition.
- Loads are rigged correctly.
- Safety of the rigging crew and other potentially exposed personnel is maintained.

Rigging and Sling Inspections and Safety Requirements

- Only select rigging equipment that is in good condition.
- Hooks shall be equipped with safety latches.
- All rigging equipment shall be inspected annually; defective equipment is to be removed from service and destroyed to prevent inadvertent reuse.
- The load capacity limits shall be stamped or affixed to all rigging components.
- All devices shall be visually inspected prior to use and removed from service for any of the following conditions:
 - Nylon slings with:
 - Abnormal wear.
 - Torn stitching.
 - Broken or cut fibers.
 - Discoloration or deterioration.
 - Wire rope slings (see Wire Rope Inspection) with:
 - Kinking, crushing, bird caging, or other distortions.
 - Evidence of heat damage.
 - Cracks, deformation, or worn end attachments.
 - Six randomly broken wires in a single rope lay.
 - Three broken wires in one strand of rope.
 - Hooks opened more than 15% at the throat.
 - Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.
 - Alloy steel chain slings with:
 - Cracked, bent, or elongated links or components.
 - Cracked hooks.
 - Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

Rigging a Load

- Determine the weight of the load - do not guess.
- Determine the proper size for slings and components.
- Do not use manila rope for rigging.
- Ensure that shackle pins and shouldered eyebolts are installed in accordance with the manufacturer's

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- recommendations.
- Ensure that ordinary (shoulderless) eyebolts are threaded in at least 1.5 times the bolt diameter.
 - Use safety hoist rings (swivel eyes) as a preferred substitute for eye bolts wherever possible.
 - Pad sharp edges to protectslings.
 - Remember that machinery foundations or angle-iron edges may not feel sharp to the touch but could cut into rigging when under several tons ofload.
 - Wood, tire rubber, or other pliable materials may be suitable for padding.
 - Do not use slings, eyebolts, shackles, or hooks that have been cut, welded, or brazed.
 - Install wire-rope clips with the base only on the live end and the U-bolt only on the dead end.
 - Follow the manufacturer's recommendations for the spacing for each specific wire size.
 - Determine the center of gravity and balance the load before moving it.
 - Initially lift the load only a few inches to test the rigging and balance.

Inspections

Following assembly and erection of hoists, and before being put in service, an inspection and test of all functions and safety devices must be made under the supervision of a competent person.

A similar inspection and test are required following major alteration of an existing installation.

All hoists must be inspected and tested at not more than 3-month intervals. The Company must prepare a certification record, which includes the date the inspection and test of all functions and safety devices was performed; the signature of the person who performed the inspection and test; and a serial number, or other identifier, for the hoist that was inspected and tested. The most recent certification record must be maintained on file.

Cranes shall be inspected on the following schedule:

- After Modification
- After Repair Or Adjustment
- Post Assembly
- Each Shift
- Monthly
- Annual Comprehensive

Additional inspections will occur for the following situations: Severe Service

- Shock load, corrosive atmosphere, etc.
- Inspect exposed items/conditions
 - Document

Not In Regular Use

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- Idle more than three months
- Monthly inspection must be performed
- Document

Cranes and hoists that have been overloaded shall be inspected prior to being returned to service. The inspection and testing requirements are included.

Initial inspection and test shall be performed by a qualified third party.

- Prior to initial use all new and altered cranes shall be inspected and tested to ensure compliance with the provisions of 29 CFR1910.179 and ABSIB30.2.
- Only after determining, by this inspection, testing and proper documentation, that the crane is in safe operating condition, shall it be put into service.

The Company shall designate a competent person who shall inspect all machinery and equipment prior to each use, and during use, to make sure it is in safe operating condition. Any deficiencies shall be repaired, or defective parts replaced, before continued use. Daily pre-use inspections shall be performed by the crane operator (designated as the Company's designated competent person) prior to beginning shift and through observation during normal operation. Daily inspections shall include:

- Any deficiencies shall be repaired, or defective parts replaced, before continued use.
- All functional operating mechanisms for maladjustment interfering with proper operation.
- Deterioration or leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems.
- Hooks, if deformations or cracks are found the hook shall be tagged out of service until repaired and tested by qualified personnel.
- Hoist chains, including end connections, for excessive wear, twist, distorted links interfering with proper function, or stretch beyond manufacturer's recommendations.

Severe Service Inspection

Severe service inspections shall be conducted to inspect exposed items and conditions resulting from a shock load, corrosive atmosphere, etc. Inspections shall be documented.

Not in Regular Use Inspection

If equipment is idle for more than three months a monthly inspection shall be performed before being placed in service. The same criteria for monthly inspections shall be followed.

Monthly Inspection

Monthly inspections of equipment by a competent person are documented. Equipment must be inspected monthly by a competent person and documented. Documentation must include the following:

- Items checked,

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- Results of inspection, and
- Name and signature of the inspector.

Documentation must be retained for 3 months. Documented monthly inspection not required if the daily inspection is documented and records are retained for 3 months.

If safety hazards are found during inspections, the equipment in question shall be tagged out and not used until repairs are made. Any deficiencies constituting a safety hazard shall cause the equipment to be tagged out of service

until repairs are made.

Annual Inspection

A thorough, annual inspection and functioning testing of the hoisting machinery shall be documented made by a qualified person, or by a government or private agency recognized by the U.S. Department of Labor using the detail inspection criteria per regulation. COMPANY shall maintain a record of the dates and results of inspections for each hoisting machine and piece of equipment and kept on file for 12 months or until the next annual inspection.

Wire Rope Inspection

Wire rope will be inspected on the following schedule:

- Shift Inspection – Before each shift.
- Monthly Inspection - All wire ropes, including running ropes and the inspection shall be documented.
- Annual Inspection – At least every 12 months, unless not feasible due to set up. This will be a more detailed inspection including wire rope that is normally hidden during daily or monthly inspections and the inspection shall be documented.
- All ropes must be thoroughly inspected before a crane is used certified by record of date of inspection, ID of the rope inspected & signature of person performing the inspection.

A COMPANY competent person will conduct visual inspections before each shift, monthly and annually for wire rope and categorize deficiencies in:

Category I Deficiencies

- Significant distortion of the wire rope structure such as kinking, crushing, un-stranding, bird caging, signs of core failure, or steel core protrusion between the outer strands.
- Significant corrosion.
- Electric arc (from a source other than power lines) or heat damage.
- Improperly applied end connections.
- Significantly corroded, cracked, bent, or worn end connections (such as from severe service).

If a Category I deficiency is identified, an immediate determination shall be made by the qualified person as to replacement of the wire rope, or if the deficiency is localized, the wire rope may be severed at the bad spot and may be continued to be used.

Category II Deficiencies

Visible broken wires as follows:

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- In running wire ropes: six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay.
- In rotation resistant ropes: two randomly distributed broken wires in six rope diameters or four randomly distributed broken wires in 30 rope diameters.
- In pendants or standing wire rope more than two broken wires in one rope lay located in rope beyond end connections and / or one or more broken wire in a rope lay located at an end connection.

If a category II deficiency is identified an immediate determination shall be made by the qualified person as to, based on manufacturer recommendations, either remove or monitor the wire rope for continued deterioration.

The qualified person determines when to replace the wire rope (no more than 30 days after the deficiency is identified).

A qualified person assesses the deficiency in light of the load and other conditions of use and determines it is safe for continued use.

A qualified person establishes the parameters of use. All workers who conduct shift inspections are notified.

The qualified person's findings and procedures are documented. Category

III Deficiencies

- Electrical contact to power line
- Core protrusion or other distortion indicating core failure in rotation resistant wire rope
- Broken strand

If a category III deficiency is identified, operations involving use of the wire rope shall be prohibited until the:

- Wire rope is replaced (ALWAYS with power linecontact).
- Deficiency is localized and problemcorrected.

Operational Procedures

Only qualified personnel shall operate cranes and equipment covered by this program. Operators shall comply with the following safety rules while operating cranes and hoists:

- Employees shall not be exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres when internal combustion engine powered equipment is used. Tests shall be conducted and documented.
- Do not engage in any practice that will divert your attention while operating the crane.
- Respond to signals only from the person who is directing the lift or any appointed signal person.
- Obey a stop signal at all times, no matter who gives it.
- Do not move a load over people.
- People shall not be placed in jeopardy by being under a suspended load.
- Do not work under a suspended load unless the load is supported by blocks, jacks, or a solid footing that will safely support the entire weight.
- Have a crane or hoist operator remain at the controls or lock open and tag the main electrical disconnect switch

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- Ensure that the rated load capacity of a crane's bridge, individual hoist, or any sling or fitting is not exceeded.
- Know the weight of the object being lifted.
- Check that all controls are in the OFF position before closing the main line disconnect switch.
- If spring-loaded reels are provided to lift pendants clear off the work area, ease the pendant up into the stop to prevent damaging the wire.
- Avoid side pulls. These can cause the hoist rope to slip out of the drum groove, damaging the rope or destabilizing the crane or hoist.
- To prevent shock loading, avoid sudden stops or starts. Shock loading can occur when a suspended load is accelerated or decelerated, and can overload the crane or hoist. When completing an upward or downward motion, ease the load slowly to astop.

A visual inspection of the equipment will be conducted by a competent person prior to each shift. A competent person must conduct a visual inspection of equipment prior to each shift. The inspection must consist of observation for apparent deficiencies. Some of the inspection items include control mechanisms, pressurized lines, hooks and latches, wire rope, electrical apparatus, tires (when used), and ground conditions. The designated competent person operator shall do the following steps before making lifts with any crane or hoist:

- Test the upper-limit switch and slowly raise the unloaded hook block until the limit switch trips.
- Visually inspect the hook, load lines, trolley, and bridge as much as possible from the operator's station; in most instances, this will be the floor of the building.
- If provided, test the lower-limit switch.
- Test all direction and speed controls for both bridge and trolley travel.
- Test all bridge and trolley limit switches, where provided, if operation will bring the equipment in close proximity to the limit switches
- Test the pendant emergency stop.
- Test the hoist brake to verify there is no drift without a load.
- If provided, test the bridge movement alarm.
- Lock out and tag for repair any crane or hoist that fails any of the above tests.
- Any deficiencies shall be repaired, or defective parts replaced, before continued use.

Moving a Load

- Center the hook over the load to keep the cables from slipping out of the drum grooves and overlapping, and to prevent the load from swinging when it is lifted.
- Inspect the drum to verify that the cable is in the grooves.
- Use a tag line when loads must traverse long distances or must otherwise be controlled.
- Manila rope may be used for tag lines.
- Plan and check the travel path to avoid personnel and obstructions.
- Lift the load only high enough to clear the tallest obstruction in the travel path.
- Start and stop slowly.
- Land the load when the move is finished.
- Choose a safe landing area.

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- Never leave suspended loads unattended
- In an emergency where the crane or hoist has become inoperative, if a load must be left suspended, barricade and post signs in the surrounding area, under the load, and on all four sides.
- Lock open and tag the crane or hoist's main electrical disconnect switch.

Parking a Crane or Hoist

- Remove all slings and accessories from the hook.
- Return the rigging device to the designated storage racks.
- Place the emergency stop switch (or push button) in the OFF position.

Cranes or hoists shall not be loaded beyond their rated capacity for normal operations.

Any crane or hoist suspected of having been overloaded shall be removed from service by locking open and tagging the main disconnect switch. Overloaded cranes shall be inspected, repaired, load tested, and approved for use before being returned to service.

Fall Protection

Anyone conducting non-assembly/disassembly work, maintenance or repair on cranes or hoists at heights greater than 6 ft (1.8 m) shall use fall protection. Fall protection includes safety harnesses that are fitted with a lifeline and securely attached to a structural member of the crane or building. Anchorages must be any substantial part of the boom or to any substantial piece on the equipment (using correct fall protection equipment). A fall arrest system is

permitted to be anchored to the crane/derrick's hook or other part of the load line where the following requirements are met:

- A qualified person has determined the set-up and rated capacity meets or exceeds the anchorage requirements
- The operator is aware it is being used for this purpose

Exceptions to using fall protection involving non-assembly/disassembly work:

- While at a work station or going to and from a workstation.
- When walking point to point along a horizontal lattice boom that has been lowered to the ground and supported.
- In the cab or on the deck

Fall protection must be used when working over 15 feet during the assembly/disassembly process, except when the employee is:

- At or near the draw-works
- In the cab, or on the deck

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Signalling

A signal person must be provided if the operator's view is obstructed, if site specific safety concerns require it or if the operator determines that it is necessary. A signal person must be provided for the following situations:

- The point of operation is not in full view of the operator
- The view is obstructed when the equipment istraveling
- The operator or the person handling the load determines it is necessary due to site specific concerns.

Signals to the operator shall be in accordance with the standard hand signals prescribed by the applicable ANSI standard for the type of crane in use unless voice communications equipment (telephone, radio, or equivalent) is used.

- Signalers must be qualified.
- Signals shall be discernible or audible at all times.
- Some special operations may require addition to or modification of the basic signals.
- For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator, and shall not be in conflict with the standard signals.

STANDARD HAND SIGNAL

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Training

Mandatory training is required for:

- Overhead power lines
- Signal persons
- Competent/qualified persons

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- Operators
- Crush/pinch points
- Tag-out

Administrative Requirements

Training Costs

COMPANY must provide all training required under the crane and derrick rules at no cost to the employee.

Refresher Training

COMPANY must provide refresher training in relevant topics for each employee when there is an indication that retraining is necessary on the basis of COMPANY actions or an evaluation of the employee's knowledge.

Training Evaluation

COMPANY must evaluate each employee who has been trained in crane and derrick operations to verify that he or she understands the information provided in training. The rule allows COMPANY to determine the most appropriate method of evaluation.

Note: The crane operator training applies only in states that do not have their own licensing and certification requirements. All other training and qualification requirements apply to all personnel.

CRANE OPERATOR TRAINING

The Company must comply with federal requirements to train crane operators employed by them. During the certification phase-in period (i.e., November 2010 to November 2014) in states without operator licensing laws, the Company must ensure that crane and derrick operators covered by the rules are competent to operate the equipment safely. Where an employee assigned to operate machinery does not have the required knowledge or ability to operate the equipment safely, the Company must train that employee before operating the equipment. The Company must ensure that each operator is evaluated to confirm that he or she understands the information provided in the training.

Operator-in-training requirement effective November 10, 2014

The rules for operator-in-training (e.g., prequalification/certification training, operator's trainer monitoring, multiple-lift rigging operations) in states without operator licensing rules are applicable on November 10, 2014. Until that date, operators must comply with the minimum training requirements required under the transition period from November 8, 2010 to November 10, 2014.

Minimum Training Requirements

Before operating crane equipment, each crane operator must be trained to know how to safely operate the specific type of equipment he or she will operate, including all of the following:

- Safe practices for testing the boom hoist brake on friction equipment and all other equipment with a boom (see 29 CFR 1926.1430(c)(4)(i) for the specific safe practices);
- The manufacturer's emergency procedures for stopping unintended equipment movement, where available;

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- The controls and operational/performance characteristics;
- Use of, and the ability to calculate (manually or with a calculator), load and capacity information on a variety of configurations of the equipment;
- Procedures to prevent and respond to power line contact;
- Technical knowledge similar to the subject matter criteria listed in Appendix C of the regulation applicable to the specific equipment (such as general technical information about wire ropes and rigging devices, site information, operations for carrying loads and multicrane lifts, and use of load charts);
- Technical knowledge applicable to the suitability of the supporting ground and surface to handle expected loads, to site hazards, and to site access;
- The applicable manuals, consensus standards, and other materials incorporated into the regulation.

The operator must be able to read and locate relevant information in the equipment manual and other materials containing information about the safe operation of equipment.

Operator Skills Demonstration

The Company must ensure that the operator has demonstrated the skills necessary for safe operation of the equipment, including:

- The ability to recognize, from visual and auditory observation, the items listed in the regulation for shift inspection (29 CFR 1926.1412(d));
- Operational and maneuvering skills;
- Application of load chart information;
- Application of safe shutdown and securing procedures.

Overhead Power Line Training

In cases where crane equipment is expected to come closer to live power lines than the minimum clearance distance permitted under the rules for power line safety COMPANY must train each crane operator and crew member assigned to work with equipment the procedures to be followed in the event of electrical contact with a power line. Such training must include:

- Information regarding the danger of electrocution from the operator simultaneously touching the equipment and the ground.
- The importance to the operator's safety of remaining inside the cab except where there is an imminent danger of fire, explosion, or other emergency that necessitates leaving the cab.
- The safest means of evacuating from equipment that may be energized.
- The danger of the potentially energized zone around the equipment (step potential).
- The need for crew in the area to avoid approaching or touching the equipment and the load.
- Safe clearance distance from power lines.
- Power lines are presumed to be energized unless the utility owner/operator confirms that the power line has been and continues to be deenergized and visibly grounded at the worksite.
- Power lines are presumed to be uninsulated unless the utility owner/operator or a registered engineer who is a qualified person with respect to electrical power transmission and distribution confirms that a line is insulated.
- The limitations of an insulating link/device, proximity alarm, and range control (and similar) device, if used.
- The procedures to be followed to properly ground equipment and the limitations of grounding.

Employees working as dedicated spotters must be trained to enable them to effectively perform their task, including training on the applicable requirements of this section.

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Tag Out and Start-up Procedures Training

Each operator must be trained in the tagout and start-up procedures specified in the rule for crane and derrick equipment that is out of service (see Operation rule at 29 CFR 1926.1417(f) and (g)).

Operators of Derricks, Sideboom Cranes and equipment with a maximum manufacturer-rated hoisting/lifting capacity of 2,000 lb. Or less

Such operators are exempt from the detailed training requirements for other cranes. However, before operating such equipment, they must be trained in the safe operation of the type of equipment they will be operating.

ASSEMBLY/DISASSEMBLY (A/D) DIRECTOR

The A/D director is a person who supervises equipment assembly and disassembly operations and must understand the applicable A/D procedures.

The A/D director must meet the criteria for a competent and qualified person under the following conditions:

- Where the assembly and disassembly is performed by only one person, that person is considered the A/D director and must meet the training criteria for both a competent person and a qualified person;
- Where the A/D director is assisted by one or more qualified persons, he or she must meet the criteria for a competent person and is not required to be a qualified person.

AUTHORIZED PERSONNEL TRAINING

Each employee assigned to work on or near the equipment (i.e., authorized personnel) must be trained to:

- Recognize swing radius hazards;
- Recognize struck-by and pinch/crush hazard areas posed by the rotating superstructure;
- Keep clear of holes and crush/pinchpoints.

COMPETENT PERSON TRAINING

The competent person (i.e., one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them) must be trained in any additional requirements of his or her role and responsibility under the new rules. For example, a competent person assigned to conduct a visual inspection of equipment during each shift the equipment is used must be trained in the required elements of a shift inspection.

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CREW MEMBER TRAINING

Assembly and Disassembly Operations

Before commencing assembly/disassembly operations, the A/D director must ensure that the crew members understand:

- Their tasks and the hazards associated with the tasks;
- The hazardous positions and locations that they need to avoid.

Work Near Power Lines

Crew members assigned to work with crane and derrick equipment must receive the same overhead power line training as required for crane operators, regardless of the distance from the power lines. See the Crane Operator

Training subsection for more information.

DEDICATED SPOTTER

The dedicated spotter must meet the qualifications for a signal person and complete the training requirements for crew member.

The dedicated spotter's sole responsibility is to watch the separation between power lines and the crane or derrick equipment, load line and load (including rigging and lifting accessories) and ensure through communication with the operator that the applicable minimum approach distance is not breached.

MAINTENANCE AND REPAIR EMPLOYEE QUALIFICATIONS AND TRAINING

Maintenance and repair personnel must be trained to operate the equipment under limited conditions necessary to perform the maintenance or repair. The operation is limited to those functions necessary to perform maintenance, inspect the equipment or verify its performance. Such personnel may operate the equipment under the direct supervision of a qualified or certified crane operator, or if they are familiar with the operation, limitations, characteristics, and hazards associated with the type of equipment.

Qualified Person

A maintenance and repair employee must be a qualified person (i.e., a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project). Maintenance and repair workers are not considered "operators" and are therefore not required to be trained in all of the areas required for crane operators.

Tagout and Start-up Procedures Training

Each maintenance and repair person must be trained in tagout and start-up procedures specified in the rule (see Operation rule at 29 CFR 1926.1417(f) and 29 CFR 1926.1417(g)).

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QUALIFIED PERSON

Qualified person is an employee by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project. Riggers and signalers are examples of personnel that must meet the requirements for qualified person.

COMPANY must train each qualified person regarding the requirements of the crane and derrick regulations applicable to their respective roles.

FALL PROTECTION TRAINING

COMPANY must train each employee who may be exposed to fall hazards while on or hoisted by crane equipment on all of the fall protection requirements in the rule (29 CFR 1926.1423(a) to

1926.1423(j)), and the applicable criteria and practices in the fall protection rule for construction at 29 CFR 1926.502.

TRAINING RECAP TABLE

Personnel	Activity or Equipment	Training Requirement
All personnel	Work with cranes and derricks	Hazards and procedures to keep clear of holes and crush/pinch points
All personnel	Exposed to fall hazards while on or hoisted by equipment	Fall protection
All personnel on floating cranes/cranes on barges	Floating cranes/derricks and cranes/derricks on barges	Understand hazard warning signs and markings
Assembly/Disassembly (A/D) Director	Supervise assembly and disassembly operations	Meet criteria of a competent person and qualified person
Authorized personnel	Work in areas near rotating crane/derrick superstructure	How to recognize struck-by and pinch/crush hazards
Competent Person	All, including shift and monthly inspections	Applicable to respective role
Crew member	Assembly and disassembly operations	Understand tasks, hazards, positions/ areas to avoid
Crew member	Work near power lines	Power line safety information and procedures
Dedicated Spotter	Work near power lines	Qualify as a signal person
Dedicated Spotter	Work near power lines	Power line safety information and procedures
Maintenance and Repair Personnel	Operate equipment	Qualify to operate
Maintenance and Repair Personnel	Equipment out of service	Tagout and start-up procedures
Operator	Derricks, sidebooms, small hoist/lift capacity cranes (2,000 lbs. Or less) only	Know how to safely operate equipment (no specific training requirements)
Operator	Friction equipment	Test the boom hoist brake

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Operator	Unintended equipment movement	Know manufacturer's emergency procedures
Operator	Operate specific type of crane (other than derricks, sidebooms, cranes of 2,000 lb or less capacity)	Know how to safely operate, inspect, calculate load, shut down, and secure
Operator	Work near power lines, and within minimum power line clearance	Power line safety and procedures in the event of electrical contact
Operator	Crane/Derrick equipment out of service	Tagout and start-up procedures
Qualified Person	All, including annual inspections	Applicable to respective role; possess a recognized degree, certificate, or professional standing, or have extensive knowledge, training, and experience.
Rigger	Assemble, rig, disassemble equipment and materials	Same as for qualified person

Personnel	Activity or Equipment	Training Requirement
Signal Person	Communicate with operator of crane/derrick with greater than 2,000 lb. Lift capacity	Qualify as a signal person with written or verbal test, retrain if needed
Signal Person	Communicate with operator of crane/derrick with lift capacity of 2,000 lb. Or less	Proper use of signals applicable to the use of the equipment

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CRANES AND DERRICKS IN CONSTRUCTION PRE-SHIFT
INSPECTION BY A COMPETENT PERSON
29 CFR 1926.1412-1413

CRANE: _____ DATE: _____
 INSPECTOR: _____

Check the box next to each item after it has passed inspection. Note any deficiencies or other observations that could pose a risk of injury or property damage.

EQUIPMENT TYPE: _____ EQUIPMENT MODEL: _____

MANUFACTURER: _____ SERIAL NUMBER: _____

Circle One		Item or Function Inspected	Notes
Yes	No	Control mechanisms for maladjustments interfering with proper Operation	
Yes	No	Control and drive mechanisms for apparent excessive wear of components and contamination by lubricants, water or other foreign matter	
Yes	No	Air, hydraulic, and other pressurized lines for deterioration or leakage, particularly those which flex in normal operation	
Yes	No	Hydraulic system for proper fluid level	
Yes	No	Hooks and latches for deformation, cracks, excessive wear, or damage such as from chemicals or heat	
Yes	No	Wire rope reeving for compliance with the manufacturer's Specifications	
		Wire Rope Category I	
Yes	No	Significant distortion of the wire rope structure such as kinking, crushing, unstranding, birdcaging, signs of core failure or steel core protrusion between the outer strands	
Yes	No	Significant corrosion	
Yes	No	Electric arc damage (from a source other than power lines) or heat Damage	
Yes	No	Improperly applied end connections	
Yes	No	Significantly corroded, cracked, bent, or worn end connections (such as from severe service).	
		Wire Rope Category II	
Yes	No	Visible broken wires, as follows:	

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Yes	No	In running wire ropes: Six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay, where a rope lay is the length along the rope in which one strand makes a	
Circle One		Item or Function Inspected	Notes
		Complete revolution around the rope.	

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Yes	No	In rotation resistant ropes: Two randomly distributed broken wires in six rope diameters or four randomly distributed broken wires in 30 rope diameters.	
Yes	No	In pendants or standing wire ropes: More than two broken wires in one rope lay located in rope beyond end connections and/or more than one broken wire in a rope lay located at an end connection	
Yes	No	A diameter reduction of more than 5% from nominal diameter.	
		Wire Rope Category III	
Yes	No	In rotation resistant wire rope, core protrusion or other distortion indicating core failure.	
Yes	No	Prior electrical contact with a power line.	
Yes	No	A broken strand.	
		Wire Rope Critical Review Items	
Yes	No	The competent person must give particular attention to all of the following:	
Yes	No	Rotation resistant wire rope in use	
Yes	No	Wire rope being used for boom hoists and luffing hoists, particularly at reverse bends.	
Yes	No	Wire rope at flange points, crossover points and repetitive pickup points on drums.	
Yes	No	Wire rope at or near terminal ends.	
Yes	No	Wire rope in contact with saddles, equalizer sheaves or other sheaves where rope travel is limited.	
Yes	No	Electrical apparatus for malfunctioning, signs of apparent excessive deterioration, dirt or moisture accumulation	
Yes	No	Tires (when in use) for proper inflation and condition	
Yes	No	Ground conditions around the equipment for proper support, including ground settling under and around outriggers/stabilizers and supporting foundations, ground water accumulation, or similar Conditions	
Yes	No	The equipment for level position within the tolerances specified by the equipment manufacturer's recommendations, both before each shift and after each move and setup.	
Yes	No	Operator cab windows for significant cracks, breaks, or other deficiencies that would hamper the operator's view.	
Yes	No	Rails, rail stops, rail clamps and supporting surfaces when the equipment has rail traveling.	
Yes	No	Safety devices and operational aids for proper operation	

SIGNATURE OF INSPECTOR _____ DATE _____

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Purpose

The purpose of this program is to establish a firm but fair disciplinary action policy to enforce the safety program.

Scope

This document is applicable to all employees.

Responsibilities

It is the responsibility of each, and every person employed by the Company to work in a safe and efficient manner. The safety program provides guidelines and procedures to help ensure that safe work practices are observed. If any employee violates provisions of the Company safety program or works in a manner that threatens his/her own health and safety or the health and safety of the employees around him/her, he/she will be subject to disciplinary action, up to and including termination of employment.

The EHS Manager, Operations Managers, Supervisors, and Foremen are responsible for enforcing the safety program and for issuing disciplinary action as required by this section of the EHS manual.

Company is committed to safety and senior management holds all supervisory staff responsible and accountable for safety within their respective areas.

Physical inspections by Company officials or insurance representatives that indicate violations showing overall lack of commitment to Company safety goals shall be under the same level of disciplinary action.

Requirements

Safety is a core value and a condition of employment at Company. violation:

The following actions constitute a safety

- Not following verbal or written safety procedures, guidelines, or rules of Company or our clients
- Horse play, failure to wear required PPE, and or abuse of PPE
- Being under the influence of drugs or alcohol during work
- Bringing weapons on the job site
- Failure to report incidents or injuries
- Attempted or actual physical force to cause injury, threatening statements, or other actions to cause an employee to feel they are at risk of injury

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Procedure

The following procedures will be followed issuing a safety violation notice:

- The first offense will result in a verbal warning. The employee is to be informed that he/she is being issued a verbal warning and informed why. Proper procedure will be discussed to clarify the situation and allow the employee to correct his/her behavior. The person making this verbal warning will inform the operations manager of his/her department that this warning has been issued so the operations manager can make a written record of the warning.
- The second offense will result in a written reprimand and additional training. The reprimand will be written on the standard Safety Reprimand form (see attached) and will describe the unsafe activity or behavior that needs correction. Refer to the section of the safety program that was violated (when applicable). The employee receiving the reprimand has the right to submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become part of the employee's employment records.
- The third offense will result in another written reprimand (using the standard form) and punitive layoff, the duration of which will be decided at the time of the disciplinary action and is to be weighed by the severity of the offense. Again, the employee may submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become part of the employee's employment records.
- The fourth offense may result in the termination of the offending employee.

The above actions are to be placed against a sliding twelve-month scale. If an employee receives a reprimand on January 1 and commits his/her fourth offense on or before December 31st of the same year, he/she is terminated. The employee does not have to commit the same violation each time to receive further reprimands. He/she could receive a verbal reprimand for smoking in a no smoking area on his/her first offense and get a written reprimand for his/her second offense which might be a forklift violation and yet another for failing to use proper personal protective equipment. He/she will be terminated upon his/her fourth offense in the last twelve months.

In the case of serious safety violations such as by-passing guarding or other unsafe activities that put the violator or other employees at serious risk of injury, the manager may move the violator directly to the second or third warning level. If the violator's actions put him/her or others at risk of death or dismemberment, the manager has the option to terminate him/her with no further warning.

The "Safety Reprimand" form shall be used to document safety violation(s) at the Company:

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Safety Reprimand Form

Date: _____ Offense #: _____

Issued To: _____ Signature: _____

Issued By: _____ Signature: _____

Description of Violation:

Follow up: _____

CC: Employee File

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Scope

This policy is applicable to all Company employees and subcontractors. If subcontractors are used, they are required to comply with this policy and testing requirements. The Company will also validate that the employees of the subcontractor have been tested to meet our client's requirements. The Company is in full compliance with DOT regs 49CFR40 and 49CFR199. As a contractor who works extensively with natural gas and hazardous liquid pipeline operators and operators of liquefied natural gas facilities, we are required to be following DOT regulations. The Company has implemented the Research and Special Programs Administration (RSPA) Alcohol regulations as set forth in 49 CFR Part 199, B and 49 CFR Part 40, Subpart C.

Testing Requirements

Drug testing is performed using a certified collector to collect the urine specimen then sent to a SAMHSA (Substance Abuse and Mental Health Services Administration) certified laboratory for analysis. Quick screen and dip stick tests are not acceptable.

FREQUENCY FOR TESTING OF DRUGS AND ALCOHOL

- Pre-Employment
- Post-Accident
- Random
- Reasonable Cause
- Return to Work
- Follow-Up as required

DRUGS BEING TESTED FOR

The names of the drugs being tested for include:

- Marijuana
- Cocaine
- Opiates
- Amphetamines
- Phencyclidine

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RECORDS

COMPANY must ensure that it will maintain appropriate records for as long as we have a contract with a client and then for 3 years after the termination of the contract. Examples include:

- Chain of custody forms
- Alcohol testing forms
- Signed acknowledgment/consent forms

Policy

Any employee or subcontractor on duty or on Company property who possesses, sells, receives, is impaired or is determined to have measurable levels of any alcohol or illegal drug in their blood or urine (no matter the amount), post drug/alcohol screen, will be subject to immediate disciplinary action or contract dismissal.

We have a Zero Tolerance policy. ANY violation to the policy will result in the permanent removal of the employee from Company or our client's premises. The Company does not have a return to duty process and will any employee or subcontractor violating this policy will be permanently banned from company or client property.

The Company prohibits firearms, weapons, explosives, etc. (other than when doing explosive cleaning for the customer) when working on company or customer premises.

Drug and alcohol testing will be performed when there is reasonable suspicion or reasonable cause to suspect the employee of being under the influence of a prohibited substance. The employee(s) or subcontractor(s) removed for reasonable cause testing will not be allowed to return to work until receipt of a negative drug and alcohol test is received.

Alcohol testing must be performed by a breath, blood, or saliva (with breath confirmation) test.

Drug and alcohol testing will be performed after an accident or incident. The employee(s) or subcontractor employee(s) will not be allowed to return to work on our clients' premises until documentation has been received showing the negative drug and alcohol test.

If an employee or subcontractor returns to work following an absence of more than 90 days, a return-to-work screening shall occur. Follow-up drug screening shall be applied when appropriate as determined by management.

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The Company must ensure that all employees who will be working on our client's jobsite must have received a negative result on a drug within the past 12 months.

The Company prohibits the misuse of prescription or over the counter medications. Some types of medications could have undesirable effects, and these can create a safety risk and endanger the employee and others. Employees must notify his/her supervisor if taking a medication that might impair their ability.

Periodically, unannounced inspections will be made of persons entering or leaving Company work sites by authorized Company representatives. Entry onto Company or client property is deemed to have provided consent to an inspection of a person, locker, vehicle, or any other personal effects. Our clients have the right to conduct unannounced searches of your personnel and property and any employee who refuses to cooperate with the searches shall be removed from our clients' property.

Any refusals to submit to a drug/alcohol screen will be treated as a positive test, resulting in immediate contract dismissal or disciplinary action, up to and employment termination. The subcontractor or employee refusing to submit to the test will be asked to sign a refusal document. If they refuse to sign the document, it will be noted and kept on file.

Drug and alcohol screening will be performed by an approved and qualified medical clinic with a medical review officer authorized to perform the tests. All results are treated with confidentiality. The switching or adulterating any urine, blood, or any other samples is a violation of this policy.

If another subcontractor or employee comes to management with concern regarding another subcontractor or employee in reference to alcohol or substance abuse, we will treat that with discretion and confidentiality. We will pursue investigation and decide accordingly whether a drug and or alcohol screen is the appropriate step to take.

All subcontractors and employees are subject to the policies explained above. This policy is to be posted in all facilities by the site supervisor.

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1.0 Purpose

The purpose of this Driver Handbook (the "Handbook") is to provide guidance to drivers who are responsible for operating Company vehicles and trailers in a safe manner.

2.0 Scope

This Handbook applies to all employees who operate a commercial motor vehicle as a function of their employment for the Company.

Violation of this Handbook and the policies contained herein may result in revocation or restriction of an employee's authorization to drive for the Company. Continued violations can lead to disciplinary actions, up to and including dismissal.

3.0 Definitions

3.1. Commercial Motor Vehicle ("CMV"): The Federal Motor Carrier Safety Administration ("FMCSA") defines a CMV as any self-propelled or towed motor vehicle used on a highway in interstate commerce to transport passengers or property when the vehicle:

- 1) Has a gross vehicle weight rating or gross combination weight rating of 4,536 kg (10,001 pounds) or more, whichever is greater; or
- 2) Is designed or used to transport more than 8 passengers (including the driver) for compensation; or
- 3) Is designed or used to transport more than 15 passengers, including the driver, and is not used to transport passengers for compensation; or
- 4) Is used in transporting material found by the Secretary of Transportation to be hazardous under 49 USC § 5103 and transported in a quantity requiring placarding under regulations prescribed by the Secretary under 49 CFR, subtitle B, chapter I, subchapter C. 49 CFR § 390.5.

3.2. Reportable Accident: This is an accident involved a CMV operating on a highway in interstate or intrastate commerce which results in:

- 1) A fatality.
- 2) Bodily injury to a person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident; or
- 3) One or more motor vehicles incurring disabling damage as a result of the accident, requiring the motor vehicle(s) to be transported away from the scene by a tow truck or other motor vehicle.

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4.0 Driver Safety and Compliance Standards

4.1. VEHICLE USE

Any driver of a CMV is required to:

- Possess and maintain a valid, current commercial driver's license ("CDL") issued from only one state or jurisdiction with specified endorsements.
- Possess and maintain a current medical examiner's certificate; and
- Observe the equipment's safe operating procedures at all times.

Drivers must not tamper with the tracking devices on Company vehicles that inform the Company of location, mileage and speed at all times. Tampering with vehicle tracking hardware will result in immediate termination and will affect a driver's ability to collect unemployment as a result.

All vehicles are equipped with E-Z Pass. The E-Z Pass transponder is never to leave the vehicle. Driver's should report "low balance" or other tollbooth warnings displayed to the office right away.

Any cash paid for tolls or fuel for the vehicle will be reimbursed. If a driver is paying for fuel using a Company gas card, those receipts must be turned in as well. It is the driver's responsibility to submit receipts for these items the same week they are purchased. All receipts must have the driver's name, employee ID number, vehicle number and job number for the day. Receipts must be submitted in a "RECEIPTS" envelope by Monday morning at 8:00 am. Receipts not submitted by then or without proper information will not be reimbursed that week.

4.2. DEPARTMENT OF TRANSPORTATION ("DOT") DRIVER COMPLIANCE

Pursuant to DOT requirements, all CMV drivers must meet the following minimum qualifications:

- Must be at least 23 years of age, unless a higher age is required by under this Handbook or other Company policies.
- Can read and speak English sufficiently to converse, understand traffic signs and signals, respond to official inquiries, and make entries on reports and records.
- Can, by reason of experience, training, or both, safely operate the CMV he or she drives.
- Is physically qualified to drive a motor vehicle in accordance with 49 CFR Subpart E — Physical Qualifications and Examinations.
- Has a currently valid CMV license issued by only one State or jurisdiction.
- Has prepared and furnished the Company with the list of convictions for the past 12 months or a certificate stating that there were no convictions pursuant to 49 CFR § 391.27.
- Is not disqualified to drive a CMV for loss of driving privileges, criminal or other offenses, violation of out-of-service orders, texting while driving a CMV, or violation of a restriction on using a hand-held mobile telephone while driving a CMV, pursuant to 49 CFR § 391.15.
- Has successfully completed a driver's road test and been issued a certificate in accordance with 49 CFR § 391.31 or has presented an operator's license or certificate of road test which the Company accepts as equivalent to a road test pursuant to 49 CFR § 391.33; and

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- Must comply with the following Motor Vehicle Record (“MVR”) requirements:
 - Have no more than 3 moving violations in the preceding 36 months;
 - Have no more than 2 moving violations in the preceding 12 months;
 - Have no serious or disqualifying traffic violations within the preceding 24 months which are defined as: excessive speeding as defined as more than 15 mph over the speed limit; reckless operation; improper or erratic lane change; failure to maintain assured clear distance; railroad crossing violation; hit and run/leaving the scene of an accident; driving under a suspended or revoked license; felony use of an automobile; or vehicular homicide.

4.3. REQUIRED DRIVER QUALITIES

The first duty of every driver is to drive safely. Our Company requires that our drivers:

- Drive defensively, doing everything expected of a professional driver to prevent accidents;
- Drive courteously, and be able to conduct themselves and operate equipment at all times in a manner that will reflect well upon the Company and the driver;
- Be physically and mentally prepared, alert, and able to anticipate the actions of pedestrians or other drivers;
- Apply appropriate incident prevention principles in day-to-day tasks; and
- Operate vehicles in accordance with all federal and state laws and regulations.

4.4. HAZARDOUS MATERIALS (“HAZMAT”)

If a driver is qualified to haul HAZMAT, the driver must ensure adherence to all the requirements outlined in 49 CFR Part 397 – Transportation of Hazardous Materials; Driving and Parking Rules, and 49 CFR Parts 171-180 – for hauling such cargo including but not limited to inspections, securement, driving, routing, and parking rules. Failure to comply with this Section may result in immediate termination.

4.5. PERMISSIONS FOR SPECIAL CIRCUMSTANCES

- Do not use the Company's vehicle for personal business unless it is approved in writing by the manager.
- Do not use a personal vehicle on Company business unless it is pre-approved by the respective manager. If the use of personal vehicles for business purposes is approved:
 - The vehicle's owner must provide a current certificate of insurance (“COI”) with specified limits of coverage.
 - The vehicle's owner will be responsible for all liability resulting from use of the vehicle.

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5.0. Driving Safely and Compliance Standards

The Company has developed safety rules with which all drivers must comply. These rules may be modified or additional driver rules may be created as the need is identified. Failure to comply with these rules may result in termination.

5.1. GENERAL REQUIREMENTS

- Wear the specified PPE, including a safety belt at all times while the vehicle is in operation;
- Be mindful of common distractions, such as eating or drinking, adjusting the vehicle's climate controls, or reaching for objects: anything that removes the driver's hands from the steering wheel, takes the driver's eyes off the road, or disrupts the driver's concentration can put the driver and others at risk.
- Take measures to manage your stress, such as proper diet, exercise, and sleep: this can result in better focus on the road.
- No passengers are allowed unless authorized has been given in writing by management.
- Allow for sufficient rest before beginning your trips and take breaks as frequently as possible along the way.
- Consume water and nutritious snacks; do not rely on sugar or caffeine to stay alert or awake.

5.2. MOBILE DEVICE USAGE

Talking or texting on a Company or personal mobile telephone while driving is forbidden. Except in the event of an emergency (when necessary to communicate with law enforcement officials or other emergency services) a driver who is operating a vehicle may only use a mobile communication device under the following circumstances:

- The mobile communication device is located where the driver who is operating the vehicle is able to initiate, answer, or terminate a call by touching a single button while in a seated driving position and properly restrained by a seatbelt; and
- The driver who is operating the vehicle uses a single earpiece, speakerphone function, voice-activated dialing, or other hands-free feature.

No driver who is operating a vehicle for an approved business purpose is permitted to:

- Send, view, or respond to any text message or e-mail (these activities include, but are not limited to, short message service, e-mailing, instant messaging, a command or request to access an internet page, or pressing more than a single button to initiate or terminate a voice communication);
- Access or view any internet site or mobile application;
- Enter data or information into a global positioning system (GPS) or navigation device; or

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- Use a radar detector, laser detector, or similar device (these devices are strictly prohibited, and drivers are to drive at a safe and reasonable speed or at the speed of traffic, but never in excess of the posted speed limit).

A copy of the Company's "Hang up and Drive" form which must be executed by each driver is attached to this Handbook in Appendix A.

5.3. DOT HOURS OF SERVICE REGULATIONS

- All drivers must maintain electronic logging or timecards in accordance with the Company's requirements and DOT requirements. It is the driver's responsibility to log all times accurately. The Company's policy is to "Log it like you drive it. Drive it legal." We recommend maintaining your daily driving log using JJ Keller's "Encompass" mobile application. This app is your provided Electronic Logging Device ("ELD"). The app must be accessible to you via your cell phone or from a Company-issued tablet. Either your smartphone or Company-issued tablet must be turned on and kept with you (and not left in the vehicle). Alternatively, a paper-based Driving Log Book can be provided to you if your cell phone or tablet is not working.
- The DOT Hours of Service Requirements generally apply to interstate operations of CMVs and restrict the hours that drivers can safely drive. The basic rules prescribe limits for consecutive hours Drivers may drive, mandate prescribed rest periods between shifts, and require each Driver to record their duty status for each 24-hour period using an ELD. 49 CFR Part 395.

5.4. STOPPING & STARTING VEHICLES

- Driver shall maintain control of vehicle keys at all times.
- Engines should be shut off during loading and unloading.
- Drivers will not let the engine idle unless there is a starting problem.
- Drivers will not jump from equipment or any platform, regardless of height. Use a three-point contact at all times while climbing into or out of the vehicle.
- Make sure that any surface you stop or park on is level, a safe distance from traffic, and able to support the weight of your vehicle.
- Make sure the vehicle is secured before getting out. Use dock plates and chocks at all times.

5.5. DEFENSIVE DRIVING

- No vehicles under the Company's authority shall exceed the posted speed limits. In addition, never drive a speed that is unsafe for existing driving conditions.
- When operating a heavy or fully-loaded vehicle, do not exceed 30 mph on severe grades. If

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operating a lighter or empty vehicle, you may use your discretion on grades so long as you maintain control of the vehicle at all times.

- Exercise caution when backing your vehicle up.
 - Before backing up, do a 360° walk-around your vehicle to determine it is safe to so.
 - When possible, do not rely solely on mirrors or backup cameras; turn around and look behind you.
 - In situations with poor visibility or oversized loads or if you feel any uncertainty, either use a spotter outside the vehicle to direct you or get out of the vehicle and assess the approach yourself.
- Only approach overhead objects such as bridges or cables if you are sure that your vehicle and load will safely clear them. Use a spotter if needed.
- Always be alert for and yield to pedestrians.

5.6. ROADSIDE STOPS

Only stop on road shoulders in the event of an emergency. If you must stop by the road:

- Choose the most level, straight, and visible area possible;
- Use your turn signal when leaving the road;
- Make every effort to completely clear your vehicle from travel lanes on the road; if it is not possible to do so, leave as much of the travel lane clear as possible;
- Once the vehicle is at a complete stop, activate your hazard signals and place other roadside emergency markers as needed (e.g., flares or reflective signs);
- Put on your safety vest before exiting the vehicle, and always assume that approaching vehicles do not see you;
- Call for assistance immediately and alert management of any needed issues;
- If it is necessary to stop on an incline, take precautions in addition to placing the vehicle in park or first gear and setting the parking brake, such as chocking the wheels;
- Stay with the vehicle if possible;
- If you need to leave the vehicle to get assistance, leave a note in a visible location inside the cab to alert other responders to your whereabouts; and
- If your tractor is operational but you need to leave your trailer, make sure it is properly supported on level, stable ground.

5.7. FUELING VEHICLES

- Follow all specified procedures for safe fueling of the equipment including review and training in the safety data sheet for the specific fuels.
- Remain in the immediate area when fueling vehicles, and be ready to respond quickly in the event of an automatic shutoff nozzle malfunction.

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5.8. COUPLING

- Make sure that the tractor and trailers are properly aligned prior to coupling.
- Avoid trying to force equipment into place, which can lead to equipment damage and personal injury.
- Assure that all guards and protective devices are in place prior to beginning the operation.
- Once the tractor has been backed into the trailer, get out and visually inspect the fifth wheel to confirm the following:
 - The trailer apron is resting snugly on the fifth wheel, not hovering above it;
 - The fifth wheel's jaws have closed around the kingpin and are secure; and
 - Attach air and electrical lines securely and make sure brakes and lights are functioning correctly.

5.9. CARGO & SECUREMENT

Improperly loaded or secured cargo can lead to cargo shifting or falling from vehicle, resulting in damaged equipment, traffic problems, injuries, or fatalities.

- Regardless of whether or not you load and secure the cargo yourself, you are responsible to inspect the cargo to assure that:
 - It is secured properly;
 - There are no overload or oversize issues;
 - It does not obscure your view in any way; and
 - It does not restrict access to emergency equipment.
- All cargo must be:
 - Within legal weight limits;
 - Positioned to prevent unstable conditions; and
 - Firmly immobilized or secured on or within a vehicle by structures of adequate strength and condition.
- Cargo and securement must be checked repeatedly.
 - Inspect the cargo and the securing devices prior to departure and as part of your pre-trip inspection.
 - In the first 50 miles of beginning the trip, re-check the cargo and securement.
 - Re-check the cargo and securing devices again every 3 hours or 150 miles, at each break, and as often as necessary during a trip to keep the load secure.

Securement structures include dunnage or dunnage bags, shoring bars, tie-downs, or a combination of these in accordance with the Company's rules and with the current FMCSA published cargo securement rules.

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6.0. Motor Vehicle Record Screening, Violations, and Incident Reporting Procedures

6.1. ACCIDENT REVIEWS

- All accidents in which a driver is involved will be reviewed by the respective manager and the safety committee to determine preventability.
- Drivers will be notified of the accident review results.
- Depending upon the results, points may be assigned to the driver which may require participation in the driver improvement course and re-qualification process.

6.2. DISCIPLINARY SYSTEM

Driving for the Company is a privilege which results in compensation for all authorized drivers regardless of whether or not they are operating the vehicle. Failure to comply with these simple rules will result in the loss of that privilege and therefore the additional income associated with it. Any disregard for these rules may result in termination.

Disciplinary actions for speeding violations are as follows. Three GPS over-the-speed-limit notifications will count towards an offense – for every notification, drivers will be notified in writing as follows:

- First Offense – Written reprimand.
- Second Offense – Written reprimand with four hours of unpaid remedial training.
- Third Offense – Written reprimand and loss of driving privileges and all associated benefits until driver completes an approved MVC defensive driving course (DDC). Training is to be paid for and completed by employee on personal time and driving privilege restoration will be at management's discretion.

All copies of signed written reprimands shall be kept in the employee's personnel file for reference purposes.

Driver's are responsible for operating the vehicle safely and legally. This includes parking properly, obeying traffic laws and wearing your seatbelt. Any tickets received for moving or personal violations are the responsibility of the person who operated or parked the vehicle. All violations, including those received while operating a personal vehicle must be reported to the office within two weeks of citation. This will enable us to determine driver's eligibility to operate a Company vehicle.

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6.3. DRIVER IMPROVEMENT COURSE & REQUALIFICATION

Drivers who receive a second or third offense written reprimand will be placed into a driver improvement course and re-qualification.

- Both the driver improvement course and requalification must be successfully completed within 30 days.
- To successfully complete the driver improvement course, drivers must be retrained in defensive driving and provide an essay on specific issues for which they had less than satisfactory safety behavior.
- Additionally, drivers must then be evaluated with a ride-along with their managers. These drivers must also be placed in a random ride-behind program to assure proper behaviors are maintained.

6.4. VEHICLE INCIDENT RESPONSE

Any incident involving a Company vehicle must be reported to the police and a supervisor immediately. Each vehicle has an "Accident Kit" inside that contains a disposable camera, a pen, and enough paper for witness statements, etc. Please gather as much information as possible at the time of the accident. Any other incidents involving a Company vehicle (scratches, dents, flat tires, etc.) should be reported to the office. If the accident kit is missing or has been used, you must notify the office so that a replacement can be arranged.

The post-collision procedures are minimum standards that all drivers should follow:

- Shut off the CMV and activate the CMV's emergency four-way warning flashers (if possible) and other warning devices (e.g., triangles, flares, etc.) where vehicles are in the roadway.
- To the extent possible, the driver should secure the scene of the collision, which includes assessing whether there are any other immediate hazards in the vicinity of the collision, such as a fire, a fuel spill, or traffic.
- If the CMV is drivable, assess whether it is safe to leave it where it is; if it is not safe to leave the CMV where it came to rest after the collision, the driver should (if possible) move it to the nearest safe location without leaving the scene, set the parking brake, and turn off the engine.
- Determine the location of where the collision occurred (e.g., highway number, street name, nearest mile marker, exit name or number, cross-street, landmarks, etc.).
- Attend to personal first aid as needed and check on all parties involved in the Collision to assess whether anyone is injured or needs medical attention.
- Call 9-1-1 to report the incident and ask for the appropriate level of help (e.g., medical, fire, police). If the driver cannot get to a phone, the driver should ask a reliable-appearing individual at the scene to notify the appropriate law enforcement agency.
- Immediately report the incident to your supervisor and follow any instructions.

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- Record the names and addresses of any other drivers, witnesses, or occupants of the other vehicles at the scene of the collision, including law enforcement or medical personnel.
- Record other pertinent information including: (i) the driver's license numbers of other drivers; (ii) the insurance company names and policy numbers of other vehicles; (iii) the license plates, makes, models, colors, and years of other vehicles; (iv) the date, time, and location of the collision; (v) the overall road and weather conditions at the time of the collision; (vi) take photographs of the scene of the collision, including the final resting place of each vehicle, physical damage sustained by the vehicles, any roadway markings from the vehicles, traffic control devices, road signs, etc.
- Do not discuss the collision with anyone at the scene except the responding law enforcement or if a Company representative is at the scene.
- To the extent possible, provide other parties involved in the collision with your name, address, driver's license number, and insurance information.

Drivers shall report the following incidents to his or her manager that do not involve the collision with another motor vehicle:

- Vandalism or theft;
- Damage to the vehicle;
- Injuries to the driver or a pedestrian;
- "Good Catches" (near miss events that could have resulted in a loss of property, injury, etc.); and
- Other problems or hazards encountered.

7.0. Vehicle Inspection and Maintenance

Each CMV has specified service and maintenance intervals determined by the vehicle manufacturer. Drivers must read, understand, and follow all manufacturer's preventive maintenance and inspection requirements. Further, the DOT requires drivers to systematically inspect, repair, and maintain all CMVs operating under its motor carrier operating authority. All parts and accessories must be in safe and proper operating condition at all times. These include those specified in 49 CFR § 393 and any additional parts and accessories which may affect the safe operation, including but not limited to, frame and frame assemblies, suspension systems, axles and attaching parts, wheels and rims, and steering systems. The items below detail relevant requirements, among others, for inspections, vehicle markings, and equipment and accessories for each CMV operating under the Company's motor carrier operating authority (49 CFR § 396).

7.1.GENERAL INSPECTION REQUIREMENTS

The DOT requires drivers to systematically inspect, repair, and maintain all CMVs operating under its motor carrier operating authority. All parts and accessories must be in safe and proper operating condition at all times. These include those specified in 49 CFR § 393 and any additional parts and accessories which may affect the safe

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operation, including but not limited to, frame and frame assemblies, suspension systems, axles and attaching parts, wheels and rims, and steering systems. The items below detail relevant requirements, among others, for inspections, vehicle markings, and equipment and accessories for each CMV operating under the Company's motor carrier operating authority. 49 CFR § 396.

7.2. ROADSIDE INSPECTIONS

A driver who receives a report of a vehicle inspection by Special Agents of the FMCSA, and state and/or local vehicle enforcement personnel certified by the Commercial Vehicle Safety Alliance ("CVSA") shall be recorded on the prescribed inspection report - The Driver Vehicle Examination Report (sometimes referred to as a Roadside Inspection Report) - shall promptly deliver the report to his or her. If the driver is not scheduled to return to a Company facility within twenty-four (24) hours, then it is necessary to fax or otherwise transmit the report to the Supervisor.

7.3. PRE- AND POST-TRIP INSPECTIONS

Drivers are to perform pre- and post-trip inspections of tractors and trailers to assure they are in safe operating condition. The pre-trip inspection includes checking the prior day's daily vehicle inspection report ("DVIR") to assure that recorded safety deficiencies have been repaired or addressed and performing a full inspection to assure that the truck and trailer remain in safe operating condition. The post-trip inspection requires a full inspection and the completion of a DVIR when safety deficiencies are found. After the day's inspections, the drivers must submit DVIRs to their managers. An example pre- and post-trip inspection is attached to this Handbook in Appendix B.

7.4. VEHICLE CLEANLINESS

The Company requires that drivers:

- Keep vehicles clean at all times, including mirrors and windows;
- Maintain a trash container in the vehicle;
- Make sure all emergency equipment, accident investigation packets, traffic control devices, spill containment equipment, and PPE is in place and in ready-to-use condition at all times; and
- Keep mirrors clean and adjusted prior to operation of the vehicle and continually throughout the shift. Report any issues associated with mirrors to prevent blind spots.

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8.0. Drug and Alcohol Policy

All policies from the Company's Drug and Alcohol Policy are applicable and incorporated by reference to this Handbook.

COMPANY DRIVER ACKNOWLEDGEMENTS

Please sign below and return this form to the office ASAP. We will return a copy to you for your reference and files.

I have read and understand the rules associated with being a Company driver. I accept the responsibility and compensation that is associated with operating a Company vehicle.

Signature

Printed Name

Approved By

Date

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Appendix A: Hang Up and Drive Form

I pledge to hang up and drive!

I have been presented with the data, the science, the policy and the consequences that can result from distracted driving. I understand that I'm at a much greater risk when I'm in a vehicle being driven by someone who is distracted.

I know that Groome cares for my well-being, the well-being of all its employees and the well-being of everyone else. As such, Groome driver policy is being changed to prohibit:

- All phone calls, even hands-free, while driving a company-owned or rented vehicle.
- All business-related phone calls when operating any vehicle.
- All calls made from a company-provided cell phone while operating any vehicle.

I understand that I may need to make change my approach to certain work-related tasks. I will participate in to helping solve operational challenges that arise from the shift in policy. I know that I can rely on Groome to help me make this transition.

I want to help make the roadways safer.

Print Name

Signature

Date

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Purpose

This program is written to follow local regulatory requirements and provide direction to managers, supervisors, and employees about their responsibilities regarding the safe operation of company-owned, leased, or rented vehicles.

Key Responsibilities

EHS Manager

- The designated EHS Manager is responsible for developing and maintaining the program and related procedures. These procedures are maintained in the EHS section of SharePoint.

Site Manager

- Responsible for the implementation and maintenance of the program for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local workplace vehicle safety program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.

Driver Related

This program applies to drivers or operators of any company owned, rented or leased vehicle.

Before operating any vehicle, the employee must be licensed, trained and qualified.

All vehicle operators must:

- Have a valid license, with the appropriate endorsements, for the type of vehicle operated.
- Be at least 21 Years of age.
- Have a complete and approved driver qualification file established.
- Comply with all applicable DOT requirements and regulations.
- Comply with all Company and Customer requirements and regulations.

Licenses

We work with two types of licenses: commercial license or CDL, and non-commercial license or operator's license. An operator's license is sometimes referred to as a class D or class O. The following describes each class of license and the type of vehicle covered by that class, with examples.

- CDL, class A
 - Combination vehicle, truck and trailer, and
 - Combined weight rating of 26,001 pounds or more, and
 - Weight rating of trailer is 10,000 pounds or more.

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- Example – A truck tractor towing a forty-foot flat trailer. A one-ton pickup towing an air pre-heater job trailer.
- CDL, class B
 - Single vehicle with a weight rating of 26,001 pounds or more, or
 - Such a vehicle towing a trailer with a weight rating of 10,000 pounds or less.
 - Example – A vacuum truck alone or a vacuum truck towing a pipe trailer.
- CDL, class C
 - Any vehicle or combination that is not covered by class A or B, but is:
 - Designed to carry at least 16 occupants.
 - Hauling material that requires placards.
 - Example – Van designed for at least 16 occupants, with or without a trailer. A one-ton pickup hauling enough hazardous material to require placards, with or without a trailer.
- Operator or class D or O
 - Any vehicle with a weight rating of 26,000 pounds or less
 - Any combination with a weight rating of 26,000 pounds or less including a trailer with a weight rating of 10,000 pounds or less.
 - Does not include a vehicle designed for at least 16 occupants.
 - Does not include a vehicle hauling enough hazardous material to require placards.

All vehicles must be of the correct size and weight and designed for the intended use. The vehicle shall be used for the intended purpose.

All above references to vehicle or combination weight rating should be interpreted to mean the gross weight rating the manufacturer has assigned to the vehicle, not the vehicle weight. Weight ratings should be stamped on the manufacturer's serial plate. The combined weight rating is obtained by adding the weight ratings of the towing and the towed units. The only instance where a weight rating is not used is when a trailer does not have a manufacturer's serial plate. In this instance, the actual weight of the trailer and the load thereon is used.

Certain situations or types of vehicles will also require endorsements to be added to the license.

Driver Qualification

All prospective drivers must be qualified to operate company owned, leased, or rented vehicles. Qualification of a commercial motor vehicle driver is described in the DOT Compliance Program. The process includes the following actions:

- Evaluation of valid license using Driving Record Evaluation as a guide.
- Creation of a complete and approved driver qualification file.
 - Application and other personal detail documents

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- Driving history investigation
- Employment history investigation
- Drug and alcohol screening data.
- Physical qualifications
- Driving test
- Record of training on Drug and Alcohol abuse and testing
- Record of training on hours of service and driver training.
- Signature for receipt of this policy.
- Annual review of Driving Record.

Qualification for other drivers is much the same as for commercial drivers. The process includes the following actions:

- Evaluation of valid license Driving Record Evaluation as a guide.
- Creation of a complete and approved driver qualification file. Several elements may be included in the driver qualification file, some are:
 - Application
 - Physical qualifications
 - Drug and alcohol screening data.
 - Copy of license
 - Employment history investigation
 - Driving test
 - Signature for receipt of this policy

Creation of the driver qualification file will begin with HR during the recruitment process. The completed file will be securely stored and maintained by the EHS Director. An annual review will be performed by the EHS Director.

Driving Record Evaluation

The review process includes consideration in four areas. They are:

- Type A violation: Single major violations that will result in immediate suspension.
- Type B violation: Vehicle accidents, regardless of fault.
- Type C violation: An accumulation of moving violations.
- Type D violation: Negative inspection reports, Out-Of-Service Orders and an accumulation of non-moving violations.

TYPE A VIOLATION

Conviction of any one of the following major violations will result in immediate suspension from driving any Company vehicle. Existing employees in a non-driving status or prospective employees with any of the following major

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violations in their five-year driving history shall not be considered for a driving position. Any driver excluded from coverage by our insurance carrier will be suspended from driving Company vehicles.

- Any alcohol or controlled substance violation (DWI/DUI/OWI/OUI, Refusing substance test, Illegal possession)
- Violation resulting in a fatality.
- Reckless disregard / reckless driving
- Homicide, assault or felony arising from the negligent operation of a vehicle.
- Hit & run, eluding a police officer.
- Any felony
- Drag racing.
- Driver license suspension
- Driving while license suspended

TYPE B VIOLATION

Includes all vehicle accidents regardless of fault, in the prior three-year history. In regard to a vehicle accident where the employee is clearly not at fault and documented undeniable proof exists, the Company may ignore this accident for driver evaluation purposes.

TYPE C VIOLATION

Includes all moving violations not classified as Type A or Type B, in the prior three-year history. Some examples follow:

- Speeding
- Improper or erratic lane changes
- Failure to yield.
- Following too closely
- Disobey traffic control device, red light, stop sign, etc.

TYPE D VIOLATION

Includes all non-moving violations (Illegal parking, vehicle defects, etc.) in the prior three-year history.

EVALUATION CRITERIA

The following criteria shall be used as guidance in determining and monitoring an employee's qualification to drive Company vehicles.

Termination or suspension of driving privilege:

- One or more Type A violations in preceding 60 months.

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- Two or more Type B violations in preceding 36 months.
- Three or more Type C violations in preceding 36 months.
- One Type B violation and two Type C violations in preceding 36 months.

PROBATION & RETRAINING

In the event that a driver's privileges have been terminated under this policy, he/she may be eligible for reinstatement to driving status, at the sole discretion of upper management, upon satisfactory completion of an acceptable remedial driver's training course. Any such reinstatement shall be conditional and probationary. Affected drivers must demonstrate the ability to operate vehicles without citation or incident of any nature for a period of at least one year from the date of reinstatement or until such time the affected driver's MVR is within the acceptable criteria. Any deviation from these standards will result in termination of driving privileges with immediate effect.

PROBATION

A Probationary period and retraining will begin in the instance of one or more of the following:

- One Type B violation in preceding 36 months.
- Two Type C violations in preceding 36 months.
- One Type C violation and two Type D violations in preceding 36 months.
- Three Type D violations in preceding 36 months.

RETRAINING

The intent of retraining is to educate the driver in the area of his/her failure as indicated by the type of violations incurred. For example, if a driver has received violations for logbook infractions, then the training should be focused on proper logging techniques and hours-of-service regulations. Similarly, the more egregious the cause, the more encompassing the retraining should be. Appropriate retraining may range in scope from utilizing Company policies and government regulations to contracting with third-party vendors. The following is a listing of items that might be used to accomplish retraining.

- 49 CFR Part 392 – Driving of Commercial Motor Vehicles
- 49 CFR Part 393 – Parts and Accessories Necessary for Safe Operation
- 49 CFR Part 395 – Hours of Service of Drivers
- 49 CFR Part 396 – Inspection, Repair and Maintenance
- Hours of Service Guidelines
- Commercial Vehicle Inspection and Maintenance
- Purchased educational material.
- Recognized defensive driving course.
- Guest instructors
- Third-party training

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All instances of Company intervention shall be completely documented, including extent of corrective action with description of cause, probationary period and retraining efforts. Documentation shall be maintained in the employee's driver qualification file. All instances will be reviewed by the EHS Department.

VIOLATION REPORTING

Drivers of Company vehicles must report license suspension and driving violations in a timely manner, regardless of the type of vehicle operated or whether the vehicle is Company owned, leased, or rented; or privately owned, leased, or rented.

- When a driver is notified that his/her license is suspended, revoked, cancelled or privilege to drive is otherwise denied, the Company must be notified, in writing, by the end of the next business day.
- When a driver receives a citation for any offense, the Company must be notified, in writing, by the end of the next business day.
- When a driver receives an inspection report from any regulating authority, the driver must immediately contact management and furnish the written report as soon as possible.
- When a driver receives an Out-Of-Service order, the driver must immediately contact management and furnish the written report as soon as possible.

Failure to report, as required above, will be addressed using the Disciplinary Program

The record of all Company drivers will be reviewed at least annually. All non-CDL drivers that are not DOT qualified will be reviewed using this policy. All non-CDL drivers that are DOT qualified will be reviewed using this policy and DOT regulations. All CDL drivers that are DOT qualified will be reviewed using this policy and DOT regulations. The disqualifying elements of this Company policy will be administered by Company management. Disqualifying elements of the DOT regulations will be administered by the Federal Motor Carrier Safety Administration and the driver's licensing state. The Company will observe and enforce disqualifications imposed by state and federal government agencies. The Company may address any driver/driving problem by using the Disciplinary Program.

Training

All drivers will be trained, at a minimum, on the applicable regulations of the Federal Motor Carrier Safety Administration, appropriate sections of the EHS Manual and the following general rules.

- Authorized drivers are not allowed to operate a company vehicle while under the influence of alcohol, cannabis, illegal drugs, or certain medications, prescriptions or over the counter medications that might impair their driving skills.
- Non-qualified or contract personnel are not permitted to operate Company vehicles.
- Drivers are responsible for the cleanliness and condition of their assigned vehicle.
- All drivers of a commercial vehicle must complete a pre-trip and post-trip inspection of their assigned vehicle and driver's logs.
- All non-commercial vehicles will be inspected and maintained in accordance with the Company's preventive maintenance program and manufacturer's recommendations.

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- As the operator of a company vehicle you:
 - And all passengers must use your safety restraint system.
 - Must be sure all required documents are in the vehicle.
 - Must comply with all federal, state and local rules of the road.
 - Must comply with the Company's Drug and Alcohol policies and procedures.
 - Must drive no faster than the weather and highway conditions allow, nor faster than the posted limit.
 - Must maintain a safe distance behind other vehicles.
 - Must signal well in advance of a turn, lane change or passing of another vehicle.
 - Are not permitted to have unauthorized passengers in or on any Company vehicle.
 - Must extinguish smoking materials and turn the ignition off when fueling.
 - Must never leave the fuel nozzle unattended.
 - May not use radar detectors.
- Backing a vehicle:
 - Eliminate backing as much as possible.
 - Position the vehicle so that it can be driven forward when next moved.
 - Before backing, always get out and visually inspect the area.
 - Assign a qualified company employee outside the vehicle to help guide.
 - Always back from the driver's side.
 - Sound the horn before backing if vehicle is not equipped with a back-up alarm.
 - Back slowly while checking both mirrors.
 - Back no farther than necessary.
- Properly secure cargo with straps or chains capable of withstanding the weight of the load.
- Safety chains must be used when towing any trailer except fifth wheel style.
- Emergency breakaway systems must be connected and functional when towing any trailer.
- All trailer coupling latches must be pinned in place.
- All accidents involving Company vehicles or equipment must be reported immediately.
- When parking a vehicle, the following rules apply:
 - Customer's property:
 - Park in designated area or so as not to interfere with normal traffic flow.
 - Set parking brake and chock wheels on commercial vehicles.
 - Place barrier tape, cones, or other required visibility items around working equipment.
 - Follow any other Customer specific rules.
 - Company property:
 - Park in designated area.
 - Set parking brake and chock wheels on commercial vehicles.
 - Remove and return keys to dispatch or other designated location.
 - Other areas (motels or restaurants).
 - Park in areas designated for the type of vehicle operated.
 - Secure vehicle from accidental movement.
 - Remove keys and lock vehicle.

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Distracted Driving Policy

An Employees' primary responsibility behind the wheel of company owned vehicle is to maintain safe handling, proper control of the vehicle, and ensure the safety of both the driver and passengers. **Any influence or behavior that could potentially detract from the driver's ability to perform those stated functions is strictly prohibited in company vehicles.** While there are many influences that have potential to distract a driver such as eating, drinking, or reaching for loose articles, by far the most critical influence is operating a handheld mobile communication device. In an effort to mitigate the fact that a driver is far more likely to become involved in a traffic collision due to this influence, the Federal Motor Carrier Safety Administration has established rules governing the use of these devices while operating a commercial motor vehicle in addition to multiple state agencies regulating their use in all motor vehicles.

FMCSA defines and prohibits the following actions while driving as "Distracted Driving"

- Reaching for your phone.
- Holding a handheld device such as a mobile phone.
- Texting (manually entering alphanumeric text into or reading a text from an electronic device)
- Reading
- Dialing

The Company has adopted the guidelines set forth in the FMCSA regulations and incorporate them in this policy. Company employees may only utilize mobile communication devices while driving company vehicles solely in a hands-free manner that does not require removing their hands from the steering wheel or diverts their attention from driving. It is strongly recommended that the driver locate a safe place and pull off the roadway before engaging in any telecommunications.

Vehicle Requirements

- All vehicles shall be fit for the purpose and shall be maintained in safe working order.
- Tires, including spares if full size, are to be of same type, profile, and tread pattern, except when the vehicle or tire Manufacturer recommends a different type for certain axles.
- Tire type and pattern are to be recommended by the vehicle or tire manufacturer for use on the vehicle in operation.
- Vehicles are to be fitted with a spare wheel and changing equipment to safely change a wheel, or a suitable alternative.
- Vehicles longer than 6 meters/20 feet or with restricted rear view (i.e. pickup trucks that are fully loaded) are to be fitted with an audible reversing alarm.
- All seats are to be fitted with headrests.
- All light duty vehicles (including buses) are to be equipped with adjustable left, right and central rear-view mirrors.
- Loads will be secure and will not exceed the manufacturer's specifications and legal limits for the vehicle.

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- All vehicles are to be equipped with a multipurpose fire extinguisher with a capacity of at least 0.9 kg/2 lb. The fire extinguisher will be securely mounted on a bracket and located so that it is easily accessible in an emergency without becoming a hazard in case of an incident.
- All light vehicles shall be equipped with a securely stowed first aid kit.
- All drivers of light vehicles will carry a reflective vest for use in case of emergency stops.
- All light duty vehicles carry a minimum of one collapsible hazard warning triangle.
- Rollover protection will be installed in any vehicle to address high-risk environments. The rollover protection engineered will conform to recognize regulatory standard and industry preferred practices.

Traffic Control

The Company will develop in writing, and implement, a traffic protection plan for its workers at a worksite if any of them may be exposed to a hazard from vehicular or pedestrian traffic that may endanger the safety of any worker. It shall include the following control measures:

- Effective means of traffic control shall be provided whenever the unregulated movement of vehicular traffic constitutes a hazard to workers.
- Traffic control will include barricades and cones as the primary control and, where required, signs, flagmen or other techniques and devices made necessary by the prevailing circumstances.
- Operations or equipment encroaching on the traveled way, shall be protected by barricades and cones as the primary control and where required other effective devices.
- The Company must train workers in the traffic control safe work procedures.
- The Company will ensure that before a worker is designated as a flag person, the worker is trained in the safe work procedures for the safe control of traffic operations and wears the appropriate high visibility outer clothing and/or equipment.
- If a worker at a project on a highway may be endangered by vehicular traffic unrelated to the project, the project will make use of as many measures as necessary to adequately protect the worker.
- A worker who is required to set up or remove traffic control measures on a roadway or a shoulder of a roadway will be a competent worker, will be equipped with the appropriate high visibility apparel, will not perform any other work while setting up or removing the measures and will be given adequate written and oral instructions in a language that he or she understands, with respect to setting up or removing the measures.

ATV Vehicles

If a The Company work site utilizes ATV vehicles, then the following shall apply:

- If the manufacturer has not set limits for operation of the ATV on sloping ground, 5% is the maximum allowable slope unless The Company has developed and implemented written safe work procedures appropriate for any steeper slope on which the equipment is to be used.
- The Company must ensure that each ATV operator is properly licensed and trained in the safe operation of the vehicle. The training program for an ATV operator must cover:

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- o The operator's pre-trip inspection.
 - o Use of personal protective apparel.
 - o Operating skills according to the ATV manufacturer's instructions.
 - o Basic mechanical requirements.
 - o Loading and unloading the vehicle if this is a job requirement.
- An ATV operator and any passenger on an ATV must wear approved eye and hearing protection as required by local regulatory requirements and the The Company PPE Program. An ATV operator and any passenger on an ATV must wear clothing suitable for the environmental conditions and when necessary to protect against the hazards presented at the worksite, suitable gloves and clothing which covers the ankles and legs and the arms to the wrists and appropriate footwear.
 - The Company requires that approved helmets shall be worn by the operator and passenger.
 - Loading and unloading of an ATV onto or off a carrier vehicle must be done in a safe manner. If ramps are used when loading or unloading an ATV they must be placed at a suitable angle, be sufficiently wide and have a surface finish which provides an adequate grip for the ATV's tires.

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Purpose and Goal

The Company is committed to protecting the safety, health and well-being of all employees and other individuals in our workplace. We recognize that alcohol misuse / abuse and drug use pose a significant threat to our goals. We have established a drug-free workplace program that balances our respect for individuals with the need to maintain an alcohol and drug-free environment. We encourage employees to voluntarily seek help with drug and alcohol problems.

COVERED WORKERS

This policy covers all Company employees including full-time employees, temporary employees, and part-time employees. Employees who are covered under Federal Motor Carrier Administration and Department of Transportation standards must comply with applicable Drug and Alcohol requirements under those standards and company policy.

APPLICABILITY

Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for the Company. Therefore, this policy applies during all working hours, whenever conducting business or representing the Company, while on call, paid standby, while on Company's property and at Company-sponsored events, such as, but not limited to, Company BBQ, volunteering events, training programs, etc.

Definitions

"Illegal Drug" means any of the following:

A drug that is:

- Not legally obtainable
- That is legally obtainable but has not been legally obtained
- A controlled substance

The term includes prescribed drugs not legally obtained, prescribed drugs not being used for prescribed purposes or prescribed drugs exceeding the recommended prescribed dosage.

"Drug free workplace" means sites for the performance of work at which employees are prohibited

from engaging in the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance in accordance with the requirements of the Federal Drug-Free Workplace Act of 1988.

Controlled substances are drugs or other substances that are controlled under the Controlled Substances Act (CSA). This act categorizes all substances which are regulated under federal law into "schedules," depending on how hazardous they are.

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"Misuse of alcohol" means any possession, consumption, or other use of an alcoholic beverage in violation of law, this policy or in any other manner not specifically permitted by Company.

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentences, or both, by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes, whether any such conviction is later expunged.

"Safety sensitive" means positions for which there is a high likelihood of causing serious injury or harm to self, other employees, customers, the public, or Company property; those positions for which the consequences of failure to perform duties in a safe and proper manner are likely to result in serious injury or harm.

PROHIBITED BEHAVIOR

All Company. employees are prohibited from the following when reporting for work, while on the job, on Company or customer premises or surrounding areas, Company-sponsored housing or in any vehicle used for Company business:

- The unlawful use, possession, transportation, manufacture, sale, dispensation or other distribution of an illegal or controlled substance or drug paraphernalia;
- The unauthorized use, possession, transportation, manufacture, sale, dispensation or other distribution of alcohol; and
- Being under the influence of alcohol or having a detectable amount of an illegal or controlled substance in the blood or urine.
- For the purpose of this policy, an employee is presumed to be under the influence of drugs if a urine test, blood test or other accepted testing procedure shows a forensically acceptable positive quantum of proof of drug usage.
- For the purpose of this policy, an employee is presumed to be under the influence of alcohol if a blood test or other scientifically acceptable testing procedure shows a blood / breath alcohol concentration (BACs) of 0.02.
- The use, possession, consumption, distribution, storage or be under the influence of any synthetic products that simulate the effect of bath salts, amphetamines, cocaine, marijuana (cannabinoid), or other illegal drugs.
- Prescription and over-the-counter drugs are not prohibited when taken in standard dosage and/or according to a physician's prescription. Any employee taking prescribed or over-the-counter medications will be responsible for consulting the prescribing physician and/or pharmacist to ascertain whether the medication may interfere with safe performance of his/her job. If the use of a medication could compromise the safety of the employee, fellow employees or the public, it is the employee's responsibility to use appropriate personnel procedures (e.g., call in sick, use leave, request change of duty, notify supervisor) to avoid unsafe workplace practices.

Prescription drugs and over-the-counter drugs are acceptable under the following circumstances:

- The employee has notified his or her supervisor prior the shift start with a written note from the prescribing doctor that clearly states the employee can work / perform a safety sensitive position. The note need not include the name of the drug or the reason the employee is taking

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the drug.

- The drug is used in the dose prescribed and within the limitations of the warnings on the bottle/insert.
- There is a 'current' prescription for the employee, when necessary.

Medical use marijuana conditions shall be treated as follow:

- Marijuana remains classified as a Schedule I substance under the Controlled Substances Act, where Schedule I substances are considered to have a high potential for dependency and not accepted medical use.
- Employees who fall under the DOT requirements must comply with the federal drug-testing laws. Medical marijuana is illegal under federal jurisdiction.

Any employee violating these prohibitions will be subject to disciplinary action up to and including termination.

NOTIFICATION OF CONVICTIONS

Any employee convicted under any criminal drug statute for a violation occurring while on the job, on Company or customer premises, or in any vehicle used for Company business must notify the Company no later than 5 days after such a conviction. A conviction includes any finding of guilt or plea of no contest and/or imposition of a fine, jail sentence, or other penalty.

SEARCHES

The Company reserves the right to conduct comprehensive searches of Company-controlled areas, vehicles, and Company personnel during work hours for any reason whatsoever. Entering the Company's property constitutes consent to searches and inspections. If an individual is suspected of violating the drug-free workplace policy, he or she may be asked to submit to a search or inspection at any time. Searches can be conducted of desks and work stations and vehicles and equipment.

Drug and Alcohol Testing

To ensure the accuracy and fairness of our testing program, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (SAMHSA) guidelines where applicable and will include a screening test, a confirmation test, the opportunity for a split sample, review by a Medical Review Officer, including the opportunity for employees who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result, and a documented chain of custody. All drug-testing information will be maintained in separate confidential records.

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Each employee, as a condition of employment, will be required to participate in pre-employment, reasonable suspicion, periodic, random, and post-accident testing. The Company may test for any or all of the following substances using the 10-panel procedure: Cocaine, Methamphetamines, Amphetamines, Opiates, THC (Marijuana), Barbiturates, Benzodiazepines, Methadone, Methaqualone, and Propoxyphene.

Pre-Employment

All new field employees will be required to pass a drug and alcohol screening within the first 30 days of employment. Office employees may be subject to the same policy.

Additional testing may be required by customers and regulatory agencies such as the U. S. Department of Transportation. In such cases, the more stringent standard shall prevail.

Reasonable Suspicion

The Company shall test its employees for drugs and alcohol when a supervisor, foreman and/or manager have a reasonable suspicion of drug or alcohol use. Reasonable suspicion will not be based on rumor, speculation, or poor information provided by other parties. Reasonable suspicion shall be documented, and referrals shall follow our procedures included in this policy. The procedures for reasonable suspicion drug and alcohol testing are found in Appendix A of this program.

Periodic Testing

Once every year, usually during the summer months, an accredited mobile health screening service provider will come on-site (our corporate office) as part of our health awareness program — among other things, all field employees will be tested using the 10-panel drug screen procedure.

Random Testing

Since all the positions at Company. are considered safety sensitive. For the purpose of this policy all Company employees are required to submit to drug testing on a random basis. Selection of employees for random testing will be conducted using a random number generator or other neutral selection process. When an employee is selected for random testing, both the employee and the employee's supervisor will be notified on the day the test is scheduled to occur.

Post-Accident Testing

All employees who are involved with, or may have contributed to, an incident that results in any property damage more than \$1,000 or an injury that requires treatment beyond onsite first aid, may be required to submit to a drug screen and alcohol test.

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Consequences

Any employee who tests positive will be immediately removed from duty. Employees who refuse to submit to a drug test or refuse to cooperate in the testing process in such a way that prevents completion of the test will be subject to the same consequences of a positive test. We will encourage such employee(s) to visit a substance abuse professional for assessment and recommendations, as required to successfully complete recommended rehabilitation including continuing care.

Such employee(s) may be re-hired through a Last Chance Agreement (see Appendix B) after successful completion of the rehabilitation treatment. In such cases, the employee must sign and abide by the terms set forth in the last chance agreement in Appendix B as a condition of continued employment. Employees under a probationary period will not in any way be considered under the Last Chance Agreement. The decision to re-hire the employee is at management's discretion.

New employees that test positive or refuse to submit to a drug test or refuse to cooperate in the testing process in such a way that prevents completion of the test during pre-employment testing will be removed from duty and terminated.

Policy Violation

Any person found in violation of this policy, or who refuses to submit to either controlled substance and alcohol abuse testing or search under the circumstances described above will be removed from the work area and be subject to disciplinary action which could include termination of employment.

Assistance

Abuse of alcohol and drugs is recognized as an illness responsive to treatment and rehabilitation that affects the Company as well as society and creates a need for guidelines regarding assistance. We recognize that employees suffering from alcohol or drug dependence can be treated. We encourage any employee to seek professional care and counseling prior to any violation of this policy.

- We encourage employees to seek help if they are concerned that they or their family members may have a drug and/or alcohol problem.
- Treatment for alcoholism and/or other drug use disorders may be covered by the employee benefit plan. However, the ultimate financial responsibility for recommended treatment belongs to the employee.
- Efforts may be made to assist the employee using available health care and community resources. However, this does not preclude, under this policy, the Company's right to administer discipline up to and including termination.

Accordingly, when it is determined that an employee is suffering from an alcohol or drug abuse problem, the individual is advised to utilize their existing health and welfare programs for treatment and rehabilitation.

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Shared Responsibility

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play. Employees are encouraged to:

- Be concerned about working in a safe environment.
- Report dangerous behavior to their supervisor.

It is the supervisor's responsibility to:

- Document negative changes and problems in performance.

Communication

Communicating our drug-free workplace policy to both supervisors and employees is critical to our success. To ensure all employees are aware of their role in supporting our drug-free workplace program:

- The policy will be reviewed in orientation sessions with new employees.
- All employees will receive an update of the policy annually via their email address and/or their paycheck.

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APPENDIX A

Guidance: Handling Employee Suspicious Behavior on the Job

As a supervisor and/or Foreman, you are not expected to diagnose substance abuse problems. Rather, you are responsible for seeing that all site activities are performed in the safest possible manner. Be aware that some of the signs and symptoms of alcohol or drug abuse are very similar to those that may arise from a medical condition or because of marital, family or financial problems.

If you become aware or suspicious of an alcohol or drug abuse situation, the following procedures can help you to deal with the problem. Do not let the affected employee create an unsafe situation for you, your team, facility personnel or themselves.

If you know *for certain* that an employee is having an alcohol or drug abuse issue (don't rely on hearsay), respect the employee's privacy by moving your conversation to a one-on-one location - the company truck or trailer can be a good place.

Assure the affected employee that his work hours for the day will be completely paid for and that you expect his cooperation on the issue.

- Clearly state that according to your observations of his work performance, appearance, behavior, or attitude, you are not comfortable letting him continue to work under your supervision.
- Follow through with explaining the company policy that, as his Supervisor/Foreman, you are liable and responsible for his safety and the rest of the team.
- Avoid becoming emotional during your conversation, so that the employee will not think you are unsure of your decision.
- Tell the employee to remain in the private place until you return to give further direction. Again, reassure him that he will be paid for the entire day if he remains cooperative.
- Call the office to notify the EH&S Manager or the management team. Be careful not to make the call to the office in the presence of the employee involved or any other employees. Make the whole procedure as private as practicable.

Whenever possible, depending on the site location, a member of our trained management staff will come to the job site to follow through with the company procedure and decide.

When a job site cannot reasonably be visited management, the Supervisor / Foreman will work closely with management to resolve the situation without incident. If you are unsure about how to handle any situation, stop what you're doing and call the office... we are here to help.

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APPENDIX B LAST CHANCE AGREEMENT

In lieu of terminating employment of an employee who tests positive for illegal substances, our company provides the employee a final opportunity to agree to comply with all company policies and practices.

_____ and the Company. agrees to the following:

The employee tested positive for an illegal substance, a serious violation of company policy. Instead of immediately terminating employment _____ will be suspended from work without pay for _____.

The employee agrees to abstain from the use of illegal substances. The employee has received another copy of the employers' drug and alcohol policy and agrees to comply with all provisions of this policy.

The employee will visit a substance abuse professional for assessment and recommendations, as required to successfully complete recommended rehabilitation including continuing care. The employee will schedule his/her first appointment no later than one (1) week from the date of this Agreement.

If employee is instructed by the substance abuse professional to seek medical advice, the employee will seek assistance from medical professionals regarding his/her use of illegal substances and will comply with all the medical professional's recommendations. Employee further agrees to sign the appropriate Medical Release Authorization to allow the Company. to receive information from the medical professional.

The employee agrees that all costs of medical consultation and treatment will be the responsibility of the employee and his/her medical insurance (as applicable). If absence from work is necessary as part of the treatment or rehabilitation, available accrued PTO and personal leave may be used to cover for treatment.

The employee agrees to unannounced periodic follow-up drug testing for a period of _____ from the date of this agreement.

The employee understands that Company. is an employment-at-will employer. The employee agrees to comply with all company policies, practices and procedures and understands that this agreement in no way prevents the employer from taking disciplinary action, including termination, for violations.

The employee accepts that this agreement is his/her last chance to remain employed at the Company while addressing his/her illegal substance abuse. Failure to comply fully with the terms of this agreement will result in immediate termination.

Employee: _____

Employee Printed Name	Signature	Date

Supervisor: _____

Supervisor Printed Name	Signature	Date

HR Representative: _____

HR Printed Name	Signature	Date

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Purpose

The purpose of the Electrical Safety program is to set forth procedures for the safe use of electrical equipment, tools, and appliances at the Company.

Scope

This program applies to all Company employees, temporary employees, and contractors. When work is performed on a non-owned or operated site, the operator's program will take precedence. However, this document covers Company employees and contractors and will be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected Personnel - Personnel who normally use and work with electrical equipment, tools, and appliances, but who do not make repairs or perform lock out/tag out procedures.

Appliances - Electrical devices not normally associated with commercial or industrial equipment such as air conditioners, computers, printers, copiers, coffee pots, microwave ovens, toasters, etc.

Circuit Breaker - A device designed to open and close a circuit by non-automatic means and to open the circuit automatically on a predetermined over current without injury to itself when properly applied within its rating.

Disconnecting Means - A device, or group of devices, or other means by which the conductors of a circuit can be disconnected from their source of supply.

Disconnecting Switch - A mechanical switching device used for isolating a circuit or equipment from a source of power.

Double Insulated Tool - Tools designed of non-conductive materials that do not require a grounded, three-wire plug.

Ground - Connected to earth or some conducting body that serves in place of the earth.

Grounded Conductor - A conductor used to connect equipment or the grounded circuit of a wiring system to a grounding electrode or electrodes.

Ground Fault Circuit Interrupter (GFCI) - A device whose function is to interrupt the electric circuit to the load when a fault current to ground exceeds some predetermined value that is less than that required to operate the over current protective device of the supply circuit. *Company will use GFCIs in lieu of an assured grounding program.*

Insulated - A conductor encased within material of composition and thickness that is recognized as electrical insulation.

Premises Wiring - That interior and exterior wiring, including power, lighting, control, and signal circuit wiring together with all of its associated hardware, fittings, and wiring devices, both permanently and temporarily installed,

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which extends from the load end of the service drop, or load end of the service lateral conductors to the outlet(s). Such wiring does not include wiring internal to appliances, fixtures, motors, controllers, motor control centers, and similar equipment.

Qualified Person - One that has been trained in the repair, construction and operation of electrical equipment and the hazards involved.

Strain Relief - A mechanical device that prevents force from being transmitted to the connections or terminals of a cable or extension cord.

Class I Locations - Are those in which flammable gases or vapors are or may be present in the air in quantities sufficient to produce explosive or ignitable mixtures.

Class 1 Division 1 - Is a location (a) in which hazardous concentrations of flammable gases or vapors may exist under normal operating conditions; or (b) in which hazardous concentrations of such gases or vapors may exist frequently because of repairs or maintenance operations or because of leakage; or (c) in which a breakdown or faulty operation or equipment or processes might release hazardous concentrations of flammable gases or vapors, and might also cause simultaneous failure of electrical equipment.

Class 1 Division 2 - Is a location (a) in which volatile flammable liquids or flammable gases are handled, processed, or used, but in which the hazardous liquid, vapors, or gases will normally be confined within closed containers or closed systems from which they can escape only in case of accidental rupture or breakdown of such containers or systems, or in an abnormal operation of equipment or (b) in which hazardous concentrations of gases or vapors are normally prevented by positive mechanical ventilation, and which might become hazardous through failure or abnormal operations of the ventilating equipment; or (c) that is adjacent to a Class 1, Division 1 location, and to which hazardous concentrations of gases or vapors might occasionally be communicated unless such communication is prevented by adequate positive-pressure ventilation from a source of clean air, and effective safeguards against ventilation failure are provided.

Class II locations - Class II locations are those that are hazardous because of the presence of combustible dust. Class II locations include the following:

Class II, Division 1 - A Class II, Division 1 location is a location (a) in which combustible dust is or may be in suspension in the air under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures; or (b) where mechanical failure or abnormal operation of machinery or equipment might cause such explosive or ignitable mixtures to be produced, and might also provide a source of ignition through simultaneous failure of electric equipment, operation of protection devices, or from other causes, or (c) in which combustible dusts of an electrically conductive nature may be present.

NOTE: This classification may include areas where metal dusts and powders are produced or processed, and other similar locations that contain dust producing machinery and equipment (except where the equipment is dust-tight or vented to the outside).

- These areas would have combustible dust in the air, under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures.
- Dusts containing magnesium or aluminum are particularly hazardous and the use of extreme caution is necessary to avoid ignition and explosion.

Class II, Division 2 - A Class II, Division 2 location is a location in which: (a) combustible dust will not normally be in suspension in the air in quantities sufficient to produce explosive or ignitable mixtures, and dust accumulations

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are normally insufficient to interfere with the normal operation of electrical equipment or other apparatus; or (b) dust may be in suspension in the air as a result of infrequent malfunctioning of handling or processing equipment, and dust accumulations resulting from there may be ignitable by abnormal operation or failure of electrical equipment or other apparatus.

NOTE: This classification includes locations where dangerous concentrations of suspended dust would not be likely but where dust accumulations might form on or in the vicinity of electric equipment. These areas may contain equipment from which appreciable quantities of dust would escape under abnormal operating conditions or be adjacent to a Class II Division 1 location, as described above, into which an explosive or ignitable concentration of dust may be put into suspension under abnormal operating conditions.

Responsibilities

MANAGERS/SUPERVISOR

The EHS Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees will be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

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Safe Work Practices

INSPECTIONS

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter will be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.
- Faulty equipment, tools, or appliances will be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

REPAIRS

- Only Qualified Personnel, who have been authorized by the department supervisor or manager, may make repairs to supply cords on electrical tools and to extension cords.
- The names of employees authorized to make repairs will be posted in the workplace.
- Only certified electricians will be allowed to make repairs to electrical equipment and wiring systems.
- The supervisor obtaining the services of a certified electrician is responsible to verify the electrician's credentials.
- Employees will not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.
- Employees will not wear conductive apparel such as rings, watches, jewelry, etc. (unless they are rendered non-conductive by covering, wrapping, or other insulating means) while working on or near open energized equipment this includes batteries on trucks, forklifts, phone backup systems or other such equipment.
- If employees are subject to handle long dimensional conductor objects (ducts or pipes), steps for safe work practices will be employed to ensure the safety of workers.

EXTENSION CORDS

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug and the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3-wire, grounded outlet, unless powering insulated tools.

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- Adapters that allow 3-wire, grounded prongs, connected to 2-wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - All extension cords will be plugged into one of the following:
 - A GFCI outlet.
 - A GFCI built into the cord.
 - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords will be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord will be removed from service and repaired or replaced.
- Extension cords will not be used on compressor skid to operate heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment will be hard wired per applicable electrical codes.

OUTLETS

- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

MULTIPLE OUTLET BOXES

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

DOUBLE INSULATED TOOLS

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a 3-wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

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SWITCHES, CIRCUIT BREAKERS, AND DISCONNECTS

- All electrical equipment and tools must have an on/off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labelled with the voltage rating.
- Each breaker within a breaker panel must be labelled for the service it provides.
- Disconnect switches providing power for individual equipment must be labelled accordingly.

LADDERS

- Only approved, non-conductive ladders may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.
- Wood ladders should not be painted, which can hide defects, except with clear lacquer.
- When using ladders, they will be free from any moisture, oils, and greases.

ENERGIZED AND OVERHEAD HIGH VOLTAGE POWER LINES & EQUIPMENT

- A minimum clearance of 20 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- The movement of mobile equipment underneath of near high voltage overhead lines shall be restricted and avoided if possible. A hazard assessment must be completed prior to operating any mobile equipment underneath or near high voltage overhead lines.
- When possible, power lines will be de-energized and grounded or other protective measures will be provided before work is started.
- Minimum approach distance to energized high power voltages lines for unqualified employees is 20 feet.
- Minimum approach distance for qualified employees will be followed per 29 CFR 1910.333(c)(3)(i) (Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current).

CONFINED OR ENCLOSED WORK SPACES

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee will isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary will be provided.

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ENCLOSURES, BREAKER PANELS, AND DISTRIBUTION ROOMS

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures will be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have "Danger: High Voltage – Authorized Personnel Only" posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (boxes, rags, cleaning fluids, etc.)

LOCK OUT/TAG OUT

- No work will be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been de-energized, the circuits energizing the parts will be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out will be treated as live parts.
- Per Company policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using Company's Control of Hazardous Energy – Lock Out/Tag Out Program. Lockouts are performed by the HSE Manager, Shop Foreman or Branch Manager. Designated employees in some branches may be trained by local management to lock out equipment. If live sources are to be worked on, it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.
- Authorized personnel will be trained in lock out/tag out procedures.
- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow Company's Control of Hazardous Energy – Lock out/Tag Out Program.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.
- A periodic inspection of any process requiring lockout / tagout shall be reviewed at least annually with each authorized and affected employee. This inspection aims to evaluate the skills and knowledge of each employee as it pertains to their lockout / tagout responsibilities, program validation and the retention of employee skills and knowledge received in previous training. The periodic inspection shall be documented with at least the following information:

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- o Date of inspection
- o Equipment locked out for inspection
- o Names of Authorized Employees audited
- o Names of Affected Employees associated with lockout / tagout
- o Name of inspector completing the periodic inspection audit

CONTRACTORS

- Only approved, certified, electrical contractors may perform construction and service work on Company or client property.
- It is the Managers/Supervisors responsibility to verify the contractor's certification.

FIRE EXTINGUISHERS

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water-type extinguishers will not be located closer than 50 feet from electrical equipment.

ELECTRIC SHOCK-CPR:

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

ELECTRIC WELDERS

- A disconnecting means will be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.
- A switch or circuit breaker will be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

EQUIPMENT GROUNDING

- All gas compressors, air compressors, separators, vessels, etc. will be grounded by means of using a lug

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- and ground strap, nominal in size to a ½" bolt or larger, attached to a ground rod six feet or longer.
- Equipment bonding jumpers will be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100°F or less will have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

ASSURED GROUNDING

OSHA requires that employers will use either ground fault circuit interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

- GISG will use GFCI's in lieu of an assured grounding program.

GROUND FAULT CIRCUIT INTERRUPTERS

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, will have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords will use a GFCI.
- Additionally, approved GFCI's will be used for 240-Volt circuits in the same service as described above.
- GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

Training

All regular full time and temporary employees will be trained in Electrical Safety utilizing the Company Electrical Safety Training course or an approved equivalent.

Employees who face a risk of electric shock, but who are not qualified persons, will be trained and familiar with electrically related safety practices.

Employee will be trained in safety related work practices that pertain to their respective job assignments. Employees will be trained on clearance distances.

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Safe work practices will be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

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PURPOSE

Each Company location shall have a written Emergency Action Plan, appropriate to the hazards of the workplace, to respond to an emergency that may require rescue or evacuation.

Each Emergency Action Plan shall be prepared to reflect all known probable emergency conditions which may arise from within the workplace and from adjacent workplaces, the minimum of which will include fire or other emergencies.

An emergency action plan must be in writing, kept in the workplace and available to employees for review. However, if a site has 10 or fewer employees the plan may be made orally to employees.

EMERGENCY RESPONSE PLANNING, ISSUING AND ANNUAL REVIEW GUIDELINES

Emergency Procedures shall be issued and discussed with all new/transferred personnel upon arrival for assignment.

Emergency Action Plans shall be established, implemented, reviewed, maintained, and updated annually in conjunction with:

- Client emergency services department requirements.
- Company safety staff and management.
- The requirement to ensure the plan is up to date to reflect current circumstances at the workplace.

The plan is to be reviewed before the job and when conditions warrant and should be used for routine and non- routine emergencies as well as changes in operation, and products or services which warrant new emergencies situations.

Additionally, a review of the emergency action plan should occur with employees:

- When the plan is developed or the employee is assigned initially to a job.
- When the employee's responsibilities under the plan change.
- When the plan is changed.

EVACUATION PROCEDURES PLANNING

Procedures for emergency evacuation shall include type of evacuation and exit route assignments. The individual site evacuation procedure shall be appropriate to the risk and must be developed and implemented to:

- Notify staff, including the first aid attendant, of the nature and location of the emergency.

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- Evacuate employees safely.
- Check and confirm the safe evacuation of all employees.
- Notify the fire department or other emergency responders.
- Notify adjacent workplaces or residences which may be affected if the risk of exposure to a substance extends beyond the workplace. Notification of the public must be in conformity with the requirements of other jurisdictions, including provincial and municipal agencies.

LIST OF POTENTIAL EMERGENCIES

Each location shall conduct a risk assessment for hazards posed by potential hazardous substances from accidental release, fire or other such emergencies that could cause an evacuation or rescue and list the potential emergencies for Company operations. Procedures for each of these potential emergencies shall be contained within the Emergency Action Plan. Examples include:

- Fire
- Gas Leaks/Chemical Spills
- Bomb Threats
- Medical Emergencies
- Explosion
- Workplace Violence

Guidance Procedures for Potential Emergencies

Fire

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if available.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt, get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Gas Leaks/Chemical Spills - Upon smelling or noticing a gas leak or unusual vapors, or a chemical spill:

- Pull fire alarm (if available) or sound warning and evacuate the premises via the nearest exit.
- Proceed to the Emergency Assembly Area.
- Contact local emergency response personnel by phone or radio.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

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If employees are required to control a release of a hazardous substance, to perform cleanup of a spill, or to carry out testing before re-entry, Company shall provide:

- Adequate written safe work procedures and documented training.
- Appropriate personal protective equipment which is readily available to employees and is adequately maintained.
- Material or equipment necessary for the control and disposal of the hazardous substance.

Bomb Threats

- If a threat is received by phone, mail or other means, get as much information as possible.
- If the threat is received by phone, try to keep the person on the line for as long as possible. Do not hang up the phone, even after the call has been terminated.
- Contact local emergency response personnel by phone or radio.
- If a suspicious device is identified, evacuate the immediate area and notify local emergency response personnel.

Medical Emergencies

- Call for assistance by phone or radio. Give the exact location and details of the medical emergency.
- If qualified, provide basic first aid, and keep the person comfortable. Do not move the person. Do not leave him/her unattended.

Arrange for emergency medical transportation based on the medical planning portion of the site's Emergency Action Plan.

Explosions

Get down on the floor, take shelter under tables or desks, and protect your face and head against flying glass and debris.

Once it is safe to do so, evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.

Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Workplace Violence

Notify security immediately by phone or radio and report the occurrence. Do NOT attempt to physically intervene. Protect yourself first at all costs.

EMERGENCY RESPONSE EQUIPMENT

Listing of Types of Emergency Equipment

Each site Emergency Action Plan shall identify, list the locations of and provide operational procedures for types of emergency

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equipment. For off-site locations, available emergency equipment should be identified and reviewed with workers prior to commencing work activities. Examples include:

- o Living areas with an audible alarm and a fire hose cabinet.
- o Emergency lighting, exit doors, dampers and fire stop flaps.
- o First aid kits located throughout the facility and in vehicles.
- o Portable fire extinguishers being located throughout the facility and clearly marked.
- o Only authorized and trained personnel will operate emergency equipment.

Inspection & Maintenance Records

Maintenance records must be kept, including but not limited to the name of manufacturer, the type of equipment, the date put into service, when and for what purpose the equipment has been used, the date of the last inspection and name of the inspecting person, any damage suffered, and the date and nature of any maintenance on emergency response equipment.

Ropes and associated equipment must be inspected visually and physically by qualified employees after each use for rescue, evacuation or training purposes.

The Company designated representative will perform and maintain the Emergency Inspection Checklist Form on a monthly basis. The checklist shall be maintained for retention in active files for two years and in on site archives for seven years.

MEDIA RESPONSE PLAN

Company employees must not be interviewed by anyone unless the HR Department has given prior approval. In most cases the HR Department will have an attorney present for such interviews.

Note: If after Company personnel have received approval for an interview from the HR Department and another party's attorney appears unannounced, you should politely adjourn the interview until the Company HR Department can be contacted. Personnel must not give any work-related interviews, affidavits, written or recorded statements, or depositions without the express approval from the Groome HR Department.

In the case of interviews of Company employees by non-attorneys, (law enforcement, government officials, media, etc) you must inform the HR Department before the interview. If the interview is taped or videotaped, you must request a copy of the tape. If the interview is reduced to writing, you must ask for a copy of any notes or statements taken. This procedure is to avoid information being misrepresented.

All media requests should be referred to the Company Chief Operating Officer. Unless requested to do so by the HR Department, other company personnel are not to give interviews or make statements to the media. Management prefers that families of personnel involved in an incident receive initial notification from a Company representative and not the media.

TRAINING

Company shall ensure training for Emergency Action Plan is delivered, documented and prepares the staff and facility for

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emergency conditions. Company will designate and train employees to assist in a safe and orderly evacuation of other employees. Requirements include:

All employees must be given adequate instruction in the fire prevention and emergency evacuation procedures applicable to their workplace.

The designated site representative shall provide the Emergency Action Plan orientation to all new/transferred personnel before they begin work.

All personnel shall receive a review/update orientation at least annually, or whenever any new/revised information is to be provided.

The Emergency Action Plan Orientation Check List shall be completed after orientation and the record maintained in the individual's training records.

Company management shall ensure that contractors/consultants working in areas under the supervision of Company also receive the Emergency Action Plan orientation upon arrival to the area.

Employees expected to perform duties under the Emergency Action Plan will be trained prior to assuming their roles. This will include simulated rescue or evacuation exercises and regular retraining appropriate to the type of rescue or evacuation being provided and training records must be kept.

A list of trained staff responders shall be posted and maintained indicating their name, response function, their work location and what type of equipment they have been trained for.

LOCATION AND USE OF EMERGENCY FACILITIES

Company shall ensure each Emergency Action Plan lists the location and how to use emergency facilities for each work site. For off-site locations, outside services that can aid in the event of an emergency should be identified and reviewed with workers prior to commencing work activities. A list shall be posted in a conspicuous area showing local emergency facilities and how to contact. Examples include:

- Client Emergency Response Department (Initial Responder for All Emergencies If Applicable)
- Local Police, Local Hospital, Poison Center (Poison Response), etc.

FIRE PROTECTION & RESPONSE

Company shall ensure each Emergency Action Plan provides fire protection and response planning within each site Emergency Action Plan and is utilized during all phases of work. As a minimum, all shall include the following:

Protection

Smoking is not permitted except in designated 'SMOKING' areas.

Facilities shall be designed and maintained in accordance with local fire code and regulations.

Portable fire extinguishers shall be stationed, inspected and maintained in accordance with local fire code and regulations. Company personnel shall be trained in their use.

Flammable and combustible liquids shall be properly stored.

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Employees shall report all fire safety issues to their immediate supervisor.

Facilities shall be inspected by use of the Groome Industrial Service Group Emergency Inspection Checklist.

Response

In the event of a fire, personnel working in the facility will adhere to the following procedure for their work area:

Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if applicable.

If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt, get out.

Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area. Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Roads are designated as fire lanes. Vehicles can stop there for unloading, but no parking will be allowed.

ALARM & EMERGENCY COMMUNICATION

Each Emergency Action Plan for Company shall contain methods to address alarms and communications in case of an emergency. For off-site locations, the method of emergency notification should be identified and reviewed with workers prior to commencing work activities.

Alarm System

Each work location must have and maintain a system to alert employees of emergencies. The alarm system shall be distinctive and recognizable as a signal to evacuate the work area or perform actions designated under the emergency action plan. For sites with 10 or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding the alarm provided all employees can hear the alarm. Each Emergency Response plan will describe how to activate an alarm and what to do after either activating or hearing an alarm.

Personnel responding to any alarm shall avoid complacency. Every alarm should be treated as an actual incident until proven otherwise. Treating and responding to alarms as a routine happening can result in injuries, fatalities, and destruction of property.

Communications

Company responders and security use telephones, cell phones and radios in conjunction with emergency response.

RESCUE AND EVACUATION PROCEDURES

Procedures for Rescue and Medical Services

Each site Emergency Action Plan shall address who performs rescue services when required. It is the position of Company that all rescue and medical duties are performed by client emergency responders or local governmental responders when on their

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location. For off-site locations, evacuation procedures and methods of rescue shall be identified and reviewed with workers prior to commencing work activities.

At least one member of a rescue team must be a first aid attendant trained to immobilize an injured employee.

Effective communications must be maintained between the employees engaged in rescue or evacuation and support persons.

Procedure for Evacuation

Preparation for Evacuation

Each site Emergency Action Plan shall contain a procedure for evacuation if required.

The Company designated Emergency Coordinator will maintain an active list of all Groome Industrial Service Group and contract emergency responders.

Critical Plant Operations Personnel

Staff designated to remain in the facility to shut down or supervise critical operations or equipment will be specifically trained and authorized by management to perform their duties before any evacuation may occur.

Evacuation Drills

Evacuation drills shall be conducted at least annually. Before conducting an evacuation drill a pre-drill assessment of the evacuation routes and assembly points shall be conducted. The pre-drill assessment is intended to verify that all egress components (stairs, doors, etc.) are in proper order and that occupants can use them safely.

Coordination Within a Facility

Emergency training and drills should also be coordinated within a Company facility so that key staff are involved in the planning process and are aware of their responsibilities in an emergency as well as during the drill.

Facility management also needs to be informed of the potential for the interruption in productivity and business operations. Alternatives for the continuity of critical operations need to be considered.

Emergency Evacuation Notification and Routes

In the event of an emergency occurring within or affecting the work site, the Emergency Coordinator makes the following decisions and ensures the appropriate key steps are taken:

- Advise all personnel of the emergency.
 - Activate the emergency notification sequence to alert the appropriate responders and initiate emergency notification within the building.
 - Evacuate all persons to the identified assembly area and account for everyone including visitors and clients.
- All personnel will proceed to the primary safe area immediately located at the identified emergency assembly area for their location.
- A copy of escape routes shall be posted in all offices, at all alarm stations and at all exits.

Sweep Check by Company Designated Responders

- Company trained responders will establish a pattern that will permit covering the area in the shortest time, with a minimum of backtracking.
- When the evacuation alarm rings, stop work immediately, and conduct a sweep of the area. Ask everyone to leave the

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premises immediately and proceed to the identified emergency assembly area for their location.

If you encounter smoke or flame, leave that section immediately, finish your sweep and evacuate the building by activating fire alarm pull stations. Remember, if in doubt, get out.

If anyone refuses to leave, note their name and location, and advise the client emergency services personnel.

Meet the client emergency services personnel and advise them of your sweep or an area of smoke or flame that you were unable to check. Assist with head count and evacuation if required.

Ensure that everyone stays at the emergency assembly area until the Emergency Coordinator has given an all clear to re-enter the building.

In the event of inclement weather, the client will make arrangements to have buses either as temporary shelter or to transport personnel to another location.

Evacuation or Drill Evaluation

Following an evacuation or drill a response review shall be conducted and documented by the Company Emergency Coordinator and lessons learned share with the appropriate responders and staff using the Groome Industrial Service Group Evacuation Report.

EMERGENCY RESPONSE PROGRAM MANAGEMENT

The Company site manager will have the overall accountability for administering the Emergency Action Plan. This is the person who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

For the purpose of this Emergency Action Plan guidance the Emergency Coordinator will be designated by the Company site manager. His/her alternate will be the Groome Industrial Service Group Site Safety Supervisor or otherwise designated by the site manager.

Employees performing rescue or evacuation must wear personal protective clothing and equipment appropriate to the hazards likely to be encountered.

Duties

Company Emergency Coordinator

The Groome Industrial Service Group Emergency Coordinator ensures that:

- o Evacuation drills are conducted on an annual basis.
- o Inspections of facilities are performed monthly.
- o All necessary repairs of components for evacuation paths are completed.
- o Plans for the modification of any part of an evacuation path are reviewed.
- o An up-to-date list of Fire Wardens is maintained.
- o Radios and reflective vests and other response equipment are available.

During an evacuation or evacuation exercise, the Company Emergency Coordinator:

Coordinates activities in accordance with either local authorities or the client Security and ERT as required. Coordinates Fire Wardens and informs them the nature of the emergency via handheld radios.

Following an evacuation or evacuation exercise, the Company Emergency Coordinator:

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- o Notifies Fire Wardens that it is safe to re-enter the building.
- o Prepares a report following an evacuation (actual or drill).
- o Reports to management for follow up or corrective actions.

Company Site Safety Supervisor

Assist the Company Emergency Coordinator when requested.

Fire Wardens

Be equipped with radios and reflective vests. The equipment is to be handed into the Company Emergency Coordinator and re-issued to the next oncoming Fire Warden for the designated area.

Be familiar with exits and muster stations for their responsible area.

Direct residents safely out of the building to the designated muster station or to an alternate location.

Sweep their affected area, ensuring that the alarms are properly functioning and that residents evacuate safely.

In order to account for all employees after evacuation, the fire wardens or designated personnel shall complete a head count and reconcile the evacuees with the attendance or daily housing report at the assigned muster station or alternate location.

Radio unaccounted for personnel to Security.

Notify personnel that they may re-enter the building when permission has been given by the appropriate authorities.

Residents, Contractors & Visitors

All employees, users, contractors and visitors will follow the instructions of the Fire Wardens, Security, ERT, Safety Personnel, managers and supervisors when asked to evacuate the building.

Know the two safest and most direct evacuation routes from their work area(s). Know the designated evacuation assembly point for the building.

Records

- Keep the original in your Emergency Response folder and monitor to ensure all action items completed as soon as possible. Report delays to senior management.
- Copies shall be distributed in accordance with the Company Site Emergency Action Plan.

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Emergency Inspection Checklist

Department:	Location:	Date of Inspection:
Inspected by:	Title:	Ext:

<u>This form is to be used monthly.</u>	N/A	Yes	No
EGRESS			
Is every means of egress arranged and clearly marked, so that the way to safety is always unmistakable?			
Are exit signs lit?			
Are there sufficient exits for the prompt escape of all employees in case of fire or other emergencies?			
Are doors that aren't exits that could be mistaken as one, clearly marked "Not an Exit"?			
Do exit doors swing out?			
Are means of egress at least 28 inches at any point and adequate width for the number of people?			
Are egresses always kept clear of obstructions and materials?			
Is there proper lighting for emergency exiting? (i.e. during a power failure)			
Are at least two exits by separate ways of travel available for each occupant?			
Is the minimum width of any exit way no less than 28 inches?			
Are furnishings and decorations so placed that they will not obstruct the exits, the access thereto, or the egress there from, or the visibility thereof?			
Are explosive and highly flammable furnishings or decorations prohibited?			
EMERGENCIES/EVACUATION			
Are evacuation maps posted in readily accessible places?			

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Do employees know where their muster point is located?			
Do employees know area hazards, the nearest exit and alternate routes of escape?			
Do employees know the preferred means of reporting emergencies?			
Do employees know the site emergency number(s)?			
Is the site emergency number posted on or by the phone?			
Do employees know what signal indicates evacuation?			
Can all personnel perceive the employee alarm?			

<u>This form is to be used monthly.</u>	N/A	Yes	No
Have employees with special assistance needs been addressed?			
Employees questioned to know where the emergency shut off is for the natural gas?			
FIRE PROTECTION			
Are fire hydrants accessible?			
Are fire hydrants inspected yearly and records maintained to show the date?			
Are control and operating valves locked open or electronically supervised?			
Are fire hoses maintained and periodically tested?			
Are combustible materials kept away from ignition sources?			
Are standpipe and hose system components visually inspected quarterly?			
Is the accumulation of flammable and combustible materials controlled so they do not contribute to fire emergency?			
Are products, supplies, merchandise, etc. not piled within 18" of sprinkler heads			
No combustibles within three feet of Hot Water Tank, Space Heaters and/or Electrical panels?			
All Compressed Gas Cylinders tied or chained to eliminate tipping?			
DETECTION AND ALARM SYSTEMS			
Are detection systems installed and maintained?			
Are all trouble alarms and fire signals investigated?			
Do detection/alarm systems shut down or reverse HVAC systems for smoke control?			
Do detection/alarm systems close smoke or fire doors?			
Do detection/alarm systems activate local alarms?			
Are alarm and PA systems periodically tested?			

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PORTABLE FIRE EXTINGUISHERS			
Does everyone know where the nearest fire extinguisher is stored?			
Has the area fire extinguisher been maintenance tested within the last year and tagged to show the date?			
Are fire extinguishers accessible and the proper type for the fire hazard?			
Are employees trained in how to use fire extinguishers?			
Is there a fire extinguisher mounted within 75 ft of any point in an area?			
Are the extinguishers clean and well cared for?			

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This form is to be used monthly.

	N/A	Yes	No
Is the seal and lock pin in place?			
Clear access to extinguishers? Not blocked?			
Is the extinguisher location plainly marked, to be visible at a distance?			
Is the extinguisher class marked on the extinguisher?			
FIRST AID / MEDICAL SUPPLIES			
Are first aid supplies stocked, clean, accessible, and sanitary?			
Are there eye/body wash facilities near injurious corrosive materials?			
Is a person or persons adequately trained to render first aid available in the near proximity to the workplace?			
Are AEDs present and operators trained?			
Condition of First Aid Kits Acceptable?			
Are employees/subcontractors familiar with the incident/accident reporting process?			
Do employees/subcontractors know where accident/incident forms are located?			

Date of last inspection of sprinkler system (required yearly) _____

Comment/Actions:

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Evacuation Report

This form is to be used to record all emergency evacuations (including drills).

Building Details

Building Name _____ Number of Floors (including ground) _____
Designated Muster Station _____ Person Completing Form _____

Evacuation Details

Evacuation Date/Time: _____/_____
Evacuation Drill Yes ☐ No ☐

Trigger for Evacuation: Fire Alarm Activated ____ Drill ____ ERT ____ Security ____

Emergency Situation: _____

Condition: Staff Only ____ All Occupants ____ After Hours ____ Unoccupied ____ Weather _____

Number of Evacuees _____ Elapsed Time to Evacuate _____ minutes

Evacuation was orderly with no panic? Yes ☐ No ☐
Mobility-impaired persons present (sight, hearing, physical, etc.)? Yes ☐ No ☐
The majority of evacuees went to the mustering points. Yes ☐ No ☐
Were the building occupants notified of this drill? Not a drill ☐ Yes ☐ No ☐

Emergency Control Organization

Emergency Coordinator _____ Deputy Emergency Coordinator _____

Emergency Coordinators were stationed at the proper emergency control point? Yes ☐ No ☐

All Fire Wardens reported to the Emergency Coordinator? Yes ☐ No ☐

If not, who did not report in? _____

All Fire Wardens were identifiable (vests, hard hats, flashlights)? Yes ☐ No ☐

Control of external building exits achieved. Yes ☐ No ☐

Did the Fire Wardens perform their duties correctly? Yes ☐ No ☐

Evacuation maps and emergency procedure posters are up to date? Yes ☐ No ☐

Building Fire & Emergency Equipment

Was the evacuation signal audible throughout the building? Yes ☐ No ☐

Automatic closing fire doors closed when the fire alarm activated? Yes ☐ No ☐

Card access doors automatically released when the fire alarm activated? Yes ☐ No ☐

☐ ☐

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Fire doors and emergency exits unobstructed?

YesNo

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Emergency Response Members

Client: Maintenance ☐ Security ☐ Company Emergency Coordinator ☐ HSE ☐
Emergency Response Team: Fire Brigade ☐ Ambulance ☐ Police ☐ Other: _____

Company Action Sheet

Issue(s)	Action(s) Required	By Who	By When	Sign Off/Date

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Emergency Action Plan Orientation Check List

Employee Name _____

Department _____

Hire/Transfer Date _____

Orientation Date _____

- ☐ Emergency Procedures
- ☐ Evacuation route(s) from assigned work area
- ☐ Evacuation from an unfamiliar area
- ☐ Location of Emergency Assembly Areas
- ☐ Receiving and following instructions during an emergency
- ☐ ALL CLEAR and re-entry procedure
- ☐ Reporting hazards and/or substandard conditions
- ☐ Advising anyone who may require assistance during an emergency evacuation
- ☐ Location of Emergency Equipment (i.e. Fire Extinguishers, etc.)

Employee Signature: _____

Orientation Conducted by: _____

Job Position/Title: _____

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Sample Emergency Action Plan Core Requirements

POTENTIAL EMERGENCIES (BASED ON HAZARD ASSESSMENT)	The following are identified potential emergencies: • Fire • List others	
EMERGENCY PROCEDURES	In the event of a fire occurring within or affecting the work site, the Emergency Coordinator (or deputy) makes the following decisions and ensures the appropriate key steps are taken: • advise all personnel • pull the fire alarm to alert the nearest fire station and initiate all fire alarms within the building • evacuate all persons to a safe point in the assembly area and account for everyone including visitors and clients	
LOCATION OF EMERGENCY EQUIPMENT	Emergency equipment is located at: • Fire Alarm – List • Fire Extinguisher – List • Fire Hose - List	
WORKERS TRAINED IN THE USE OF EMERGENCY EQUIPMENT	(1) _____ (2) _____ (3) _____ (4) _____	
EMERGENCY RESPONSE TRAINING REQUIREMENTS	Type of Training • Use of fire extinguishers • Practice fire drills	Frequency • Orientation and annually • At the call of site management
LOCATION AND USE OF EMERGENCY FACILITIES	The nearest emergency services are located at: • List facilities	

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FIRE PROTECTION REQUIREMENTS	List all site fire protection requirements.
ALARM AND EMERGENCY COMMUNICATION REQUIREMENTS	- Pulling the fire alarm automatically alerts the fire department and initiates an alarm within the building - The fire alarm signal is audible.
FIRST AID	First aid supplies are located at: - List First Aiders are: - List all names Transportation for ill or injured workers is by company vehicle. The contact number is 411.
PROCEDURES FOR RESCUE AND EVACUATION	In case of fire: - Advise all personnel - Pull the fire alarm - Evacuate all persons to a safe point in the staff parking lot and account for everyone including visitors and clients - Assist ill or injured workers to evacuate the building - Provide first aid to injured workers if required - Call emergency response personnel to arrange for transportation of ill or injured workers to the nearest health care facility if required.
DESIGNATED RESCUE AND EVACUATION WORKERS	The following workers are trained in rescue and evacuation (or describe client rescue organization): (1) _____ (2) _____ (3) _____ (4) _____

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Completed on: _____
Signed: _____

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Purpose

The purpose of this program is to establish procedures for affixing appropriate lockout/tagout equipment to energy isolating devices and to otherwise disable machines or equipment to prevent unexpected energization, start up or release of stored energy to prevent injury or incident.

Scope

This program covers the servicing and maintenance of machines and equipment where the unexpected energization or startup of the machine or equipment, or the release of stored energy could cause an incident. This program establishes minimum performance requirements for the control of such hazardous energy. When work is performed on an owned or operated site, the operator's program shall take precedence; however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program does not exist or is less stringent.

The provisions of this program apply when there is a possibility of injury due to the unexpected energization, start up or release of stored energy while constructing, installing, setting up, adjusting, inspecting, modifying, maintaining, or servicing fixed machinery. Stored energy in an electro/mechanical system can be found in rotating flywheels, weights and counterweights, hydraulic and pneumatic pressure, thermal and chemical energy, springs, and unbalanced loads.

This program does not apply to:

- Work on cord and plug connected electric equipment for which exposure to the hazards of unexpected energization or startup of the equipment is controlled by unplugging the equipment from the energy source and by the plug being under the exclusive control of the employee performing the servicing or maintenance.
- Hot tap operations provided:
 - o continuity of service is essential.
 - o shut down of the system is impractical.
 - o documented procedures are followed, and special equipment is used which will provide proven effective protection for employees.

Applicable OSHA Standards: 29 CFR 1910.147, The Control of Hazardous Energy (Lockout/Tagout) 29 CFR 1910.333, Selection and Use of Work Practices

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Definitions

Affected employee: an employee whose job requires him/her to operate or use a machine or equipment on which servicing, or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

Authorized employee: a person who locks out or tags out machines or equipment to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing service or maintenance covered under 29 CFR 1910.147, *The Control of Hazardous Energy (Lockout/Tagout)*.

Note: An authorized employee is authorized to service only machines and equipment with which they are familiar by training and/or experience.

Capable of being locked out: an energy isolating device is capable of being locked out if it has a hasp or other means of attachment to which, or through which, a lock can be affixed, or it has a locking mechanism built into it. Other energy isolating devices are capable of being locked out if lockout can be achieved without the need to dismantle, rebuild, or replace the energy isolating device or permanently alter its energy control capability.

Energized: connected to an energy source or containing residual or stored energy.

Energy isolating device: a mechanical device that physically prevents the transmission or release of energy, including but not limited to the following: a manually operated electrical circuit breaker; a disconnect switch; a manually operated switch by which the conductors of a circuit can be disconnected from all ungrounded supply conductors, and, in addition, no pole can be operated independently; a line valve; a block; and any similar device used to block or isolate energy. Push buttons, selector switches and other control circuit type devices are not energy isolating devices.

Energy source: any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.

Fixed equipment: equipment fastened in place or connected by permanent wiring methods.

Hot tap: a procedure used in the repair, maintenance and service activities which involves welding on a piece of equipment (pipelines, vessels, or tanks) under pressure in order to install connections or appurtenances. It is commonly used to replace or add sections of pipeline without the interruption of service for air, gas, water, steam, and petrochemical distribution systems.

Lockout: the placement of a lockout device on an energy isolating device, in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Lockout device: a device that utilizes a positive means such as a lock, either key or combination type, to hold an energy isolating device in a safe position and prevent the energizing of a machine or equipment.

Included are blank flanges and bolted slip blinds.

Normal production operations: the utilization of a machine or equipment to perform its intended production

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function.

Other employees: those employees whose work operations are or may be in an area where energy control procedures may be utilized.

Servicing and/or maintenance: workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment. These activities include lubrication, cleaning or unjamming of machines or equipment, and adjusting or tool changes where the employee may be exposed to the unexpected energization or startup of equipment or release of hazardous energy.

Setting up: any work performed to prepare a machine or equipment to perform its normal production operation.

Tagout: the placement of a tagout device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout device: a prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Key Responsibilities

Managers and Supervisors

- Responsible to control and enforce this plan and to see that all their employees and contractors that are affected by lockout/tagout procedures, have the knowledge and understanding required for safe application, usage, and removal of all energy controls and devices.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Employees who are affected by this program are required to attend training on an annual basis.
- Are required to follow the provisions of this program.

Procedure

The general procedures for lockout, tagout, or lockout and tagout are quite similar. Below are instructions which apply to all control of hazardous energy procedures. Exceptions and specific requirements for lockout without tagout; tagout without lockout; and lockout used in conjunction with tagout are noted in their own subchapters.

Note: Throughout this section, lockout/tagout refers to lockout without tagout; tagout without lockout; and lockout used in conjunction with tagout.

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Effective hazardous energy control procedures will protect employees during machine and equipment servicing and maintenance where the unexpected energization, start up or release of stored energy could occur and cause injury. Further, effective hazardous energy control procedures will protect employees when working near or on exposed deenergized electrical conductors and parts of electrical equipment. Hazards being guarded against include, but are not limited to: being cut, struck, caught, crushed, thrown, mangled, and/or shocked by live electrical circuits caused by the unexpected release of hazardous energy. One (1) piece of machinery can have more than one (1) real or potential source of hazardous energy that must be guarded against.

These procedures for the control of hazardous energy will ensure that machines and equipment are isolated properly from hazardous or potentially hazardous energy sources during servicing and maintenance and properly protected from reenergization as required by 29 CFR 1910.147.

While any employee is exposed to contact with parts of fixed electrical equipment or circuits which have been deenergized, the circuits energizing the parts will be locked out and/or tagged in accordance with the requirements of 29 CFR 1910.333 (b)(2).

PREPARATION FOR SHUTDOWN: Prior to lockout/tagout, all energy isolating devices must be located which apply to the specific machine in question. There may be more than one energy source. While electrical is most common, other sources could be hydraulic, pneumatic, chemical, thermal, rotational, spring, etc. All must be isolated. The Energy Source Evaluation Form and the Control Procedures Form must be completed prior to isolation. These forms must be completed by an authorized employee. Once completed, it is recommended that these evaluations remain on file for future use. Any changes in design or energy hazard will require an update of these forms. Not only the energy source hazard, but its magnitude must be recorded on the Energy Source Evaluation Form.

Example: Energy Source: Pneumatic. Magnitude: 125 p.s.i. Before an Authorized or affected employee turns off the piece of equipment, the authorized employee must have knowledge of the type and magnitude of the energy to be controlled and the methods or means to control the energy. Refer to the Control Procedures Form for specific energy control procedures.

MACHINE OR EQUIPMENT SHUTDOWN: Before lockout/tagout controls are applied, all affected employees will be notified and given the reasons for the lockout/tagout. If a machine or equipment is operating, it will be shut down by normal stopping procedures by either the affected or authorized employee.

LOCKOUT/TAGOUT DEVICE APPLICATION: Authorized employees will lockout/tagout the energy isolating devices with assigned individual locks. Locks or other lockout/tagout devices will be color coded red, white, and black and be further identified with our company name. Locks and other lockout/tagout devices will be used for no other purpose. Lockout/tagout devices will indicate the identity [name] of the authorized employee applying the device.

Lockout/tagout devices will be durable and capable of withstanding the environment to which they are exposed for the

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maximum period that exposure is expected. They shall be standardized in color [red, white, & black] and be substantial enough to prevent their removal without the use of excessive force or unusual techniques such as bolt cutters or other metal cutting tools. Key or combination locks are acceptable. Tagout device attachments shall be non-reusable, attachable by hand, self-locking, and non-releasable with a minimum unlocking strength of no less than 50 pounds. The tagout attachment will have the general design and basic characteristics of, at a minimum, a one-piece, all environmentally tolerant nylon cable tie.

Lockout/tagout devices will be applied so that they will hold the energy isolating devices in a "Neutral" or "Off" position. Protective materials and hardware shall be provided for isolating, securing, or blocking of machines or equipment from energy sources. These protective materials and hardware include, but are not limited to, locks, tag chains, wedges, key blocks, adapter pins, self-locking fasteners, etc.

RELEASE OF STORED ENERGY: All stored energy will be blocked or dissipated. Types of stored energy include flywheels, springs, hydraulic or pneumatic systems, etc. Should there be a possibility of re-accumulation of stored energy, verification of isolation must be continued until servicing is complete.

VERIFICATION OF ISOLATION: prior to starting work on machines or equipment that have been locked out and after ensuring that no personnel are exposed to the release of hazardous energy, the authorized employee shall operate the normal operating controls to verify that the machine or equipment has been deenergized and that it will not operate.

After the above test, the operating controls will be returned to the "NEUTRAL" or "OFF" position. At this point, the machine/equipment is now locked out. The work may proceed.

RELEASE FROM LOCKOUT/TAGOUT: Before the lockout/tagout devices are removed and energy is restored to the machine or equipment, the following procedures will be implemented to ensure the following:

The work area will be inspected to ensure that nonessential items have been removed and to ensure that the machine or equipment components are operationally intact.

The work area will be checked to ensure that all employees have been safely positioned or removed.

After the lockout/tagout devices have been removed and before the machine or equipment is started, affected employees will be notified that the lockout/tagout devices have been removed.

Each lockout/tagout device must be removed by the authorized employee who applied it.

Note: The one exception to the above is when the authorized employee who applied the lockout/tagout

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device is not available to remove it.

That device may be removed under the direction of the competent person provided that the below specific procedures are followed:

- Verification by the competent person that the authorized employee who applied the lockout/tagout device is not within the facility.
- All reasonable efforts will be made to contact the authorized employee to inform him/her that his/her lockout/tagout device has been removed.
- Ensuring that the Authorized Employee has been informed of the above before resuming work.
- The person who removes the device must be an authorized employee.
- Each type of control of hazardous energy procedure shall be documented using the Energy Source Evaluation Form and the Control Procedures Form except when all the below listed conditions exist:
 - The machine or equipment has no potential for stored or residual energy or re-accumulation of stored energy after shutting down which could endanger employees; and
 - The machine or equipment has a single energy source which can be readily identified and isolated; and
 - The isolation and locking out of that energy source will completely deenergize and deactivate the machine or equipment; and
 - The machine or equipment is isolated from that energy source and locked out during servicing and maintenance; and
 - A single lockout device is under the exclusive control of the authorized employee performing the servicing and maintenance; and
 - The servicing and maintenance do not create hazards for other employees; and
 - No accidents have occurred involving the unexpected activation or re-energization of the machine or equipment during servicing or maintenance.
 - The above exceptions apply to documentation only. Whether using lockout, tagout, or lockout and tagout, the general procedures are the same.

DEVICE SELECTING CRITERIA FOR NON-HAZARDOUS ENERGY

A lock, color coded with either paint or tape and **identifiable with the name of the employee who applied it**, shall be placed on each energy isolating device where feasible. Lockout is the primary means of non-electrical hazardous energy isolation and, where possible, will always be used in lieu of tagout. In the event a machine or piece of equipment will not accept a lock on its energy isolating device(s), it will be modified to do so whenever it is replaced, renovated, or undergoes a major repair.

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There are occasions where lockout cannot be accomplished and in those instances, tagout alone may be used as long as it provides full employee protection as explained below:

A tag may be used without a lock if a lock cannot be physically applied. This procedure must be supplemented with at least one additional safety measure providing a level of safety equivalent to that obtained by the use of a lock.

Examples of additional safety measures include, but are not limited to the:

- removal of an isolating circuit element.
- blocking of a controlling switch.
- opening of an extra disconnecting device.

Note: A tag may be used without a lock if it can be demonstrated that tagging procedures will provide a level of safety equivalent to that obtained by the use of a lock. This demonstration must be documented. This is an allowable, but not preferred, option.

All affected persons must be fully aware of the fact that tags used in tagout procedures are essentially a warning device affixed to energy isolating devices. Unlike locks, tags do not physically restrain. Tags will:

- be capable of withstanding the environment to which they have been exposed for the maximum period of time that exposure is expected.
- be constructed and printed so that exposure to weather conditions or wet and damp locations will not cause the tag to deteriorate or the message on the tag to become illegible.
- be standardized in at least one (1) of the following:
 - o color.
 - o shape.
 - o size.
- be standardized in print and format.
- in their method of attachment, be substantial enough to prevent inadvertent or accidental removal. Tagout device attachment methods and means shall be of a non-reusable type, attachable by hand, self-locking, and non-releasable with a minimum strength of no less than 50 pounds and have the general design and basic characteristics of being at least equivalent to a one-piece, all-environment-tolerant nylon cable tie.
- indicate the identity of the employee applying the tag.
- warn against the hazardous conditions if the machine or equipment is energized and shall include a legend such as the following: Do Not Start; Do Not Open; Do Not Close; Do Not Operate, etc.

CONTROL OF ELECTRICAL HAZARDOUS ENERGY ON FIXED EQUIPMENT

Electrical hazards associated with fixed equipment present a special hazard class and, in each case, a determination must be made whether lockout, tagout, or lockout used in conjunction with tagout is to be utilized.

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The guidelines for this determination are found in 29 CFR 1910.333. 29 CFR 1910.333 makes no mention of maintenance or servicing. Its provisions apply to any possible exposure to contact with fixed electrical equipment or circuits which have been deenergized. Live parts that operate at less than 50 volts to ground need not be deenergized if there will be no increased exposure to electrical burns or to explosion due to electric arcs. Fixed equipment is defined as: "equipment fastened in place or connected by permanent wiring methods."

Before circuits and/or equipment are deenergized, safe procedures will be determined before the fact. At a minimum:

- the circuits and equipment to be deenergized will be disconnected from all electric energy sources. Control circuit devices, such as push buttons, selector switches, and interlocks, may not be used as the sole means for deenergizing circuits or equipment. Interlocks for electric equipment may not be used as a substitute for lockout and tagging procedures.
- stored electric energy which might endanger personnel shall be released. Capacitors shall be discharged and high capacitance elements shall be short-circuited and grounded if the stored electric energy might endanger personnel. Be aware of the shock potential of capacitors and associated equipment. If they are handled in meeting this requirement (discharging), they shall be treated as energized until they have been totally discharged.
- stored non-electrical energy in devices that could reenergize electric circuit parts shall be blocked or relieved to the extent that the circuit parts could not be accidentally energized by the device.

DEVICE SELECTION CRITERIA FOR ELECTRICAL HAZARDOUS ENERGY

Note: When dealing with safety related work practices to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, a **Qualified Person** is defined as one who: "is permitted to work on or near exposed energized parts" and who, at a minimum, has been trained in and is familiar with:

- the skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment, and
- the skills and techniques necessary to determine the nominal voltage of exposed live parts, and
- the clearance distances specified in §1910.333(c) and the corresponding voltages to which the qualified person will be exposed.

A lock and tag shall be placed on each disconnecting means used to

de-energize circuits & equipment on which work is to be performed except:

- A tag may be used without a lock if it can demonstrate that tagging procedures will provide a level of safety equivalent to that obtained by the use of a lock. This demonstration must be documented. This is an allowable, but not preferred, option. A tag may also be used without a

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lock if a lock cannot be physically applied. Under either of the above two circumstances that a tag is used without a lock, the procedures must be supplemented with at least one additional safety measure that provides a level of safety equivalent to that obtained by the use of a lock. Examples of additional safety measures include:

- o the removal of an isolating circuit element.
 - o the blocking of a controlling switch.
 - o the opening of an extra disconnecting device.
- A lock may be used without a tag if, and only if:
 - o only one circuit or piece of equipment is being deenergized, and
 - o the lockout period does not extend beyond the work shift, and
 - o employees exposed to the hazards associated with reenergizing the circuit are familiar with this procedure -- utilizing a lock without a tag.

After electrical hazards are locked out, tagged out, or locked and tagged out, a Qualified Person must verify de-energization before work can proceed on deenergized equipment. Verification by the Qualified Person will include:

- Operation of the equipment operating controls or otherwise verify that the equipment cannot be restarted.
- Using test equipment to test the circuit elements and electrical parts of equipment to which employees will be exposed and verifying that the circuit elements and equipment parts are deenergized.
- Using test equipment to determine if any energized condition exists as a result of inadvertently induced voltage or unrelated voltage back feed even though specific parts of the circuit have been de-energized and presumed to be safe.

Note: If the circuit to be tested is over 600 volts, the test equipment shall be checked for proper operation immediately before and immediately after this test.

REENERGIZING ELECTRICAL EQUIPMENT

The process of reenergizing electrical equipment, even temporarily, must be accomplished as noted below in the order listed:

- A Qualified Person shall conduct tests and visual inspections, as necessary, to verify that all tools, electrical jumpers, shorts, grounds, and other such devices have been removed, so that the circuit and equipment can be safely energized.
- Employees exposed to the hazards associated with reenergizing the circuit or equipment shall be warned to stay clear of circuits and equipment.
- Each lock and tag will be removed by the authorized employee (who must also be a Qualified Person when dealing with electrical hazards).

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- If the person who applied the lock or tag is absent from the workplace, the competent person may designate another Qualified Person to remove the lock and/or tag provided that:
 - o it is assured that the Authorized Person who applied the lock or tag is not available at the workplace, and
 - o it is assured that the Authorized Person who applied the lock and/or tag is aware that the lock and/or tag has been removed before he/she resumes work at the workplace.
- A visual determination shall be accomplished to ensure all employees are clear of the circuits energized.

SPECIAL CONSIDERATIONS

Whether using lockout, tagout, or lockout and tagout procedures, the below special considerations apply.

There may be special circumstances where, during a lockout procedure, a machine or equipment must be temporarily removed from the energy isolating device and the machine or equipment energized to test or position the machine or equipment or components thereof. The below procedures will be followed to accomplish this task:

- The machine or equipment will be cleared of tools and nonessential items and, if it is to be operated, all components will be operationally intact.
- The work area will be checked to ensure that all employees have been safely positioned or removed.
- The standard release from lockout procedures will be implemented.
- The machine or equipment will be energized and testing or positioning will proceed.
- After testing or positioning, deenergize all systems and reapply the energy control device following standard procedures.

GROUP LOCKOUT AND/OR TAGOUT PROCEDURES

In the event that servicing or maintenance is performed by more than one group (craft, trade, department, for example) the following shall be implemented to **ensure that the group of employees are afforded a level of protection equal to that provided by a personal lockout or tagout device:**

- One person will be designated as Group Leader and that person will have overall responsibility for a set number of employees working under his/her control.
- The Group Leader will have exclusive control of a Master Group Lockout and/or Group Tagout device.
- The Group Leader will ascertain the exposure status of individual group members with regard to the lockout and/or tagout of the machine or equipment.
- Each authorized employee within the group shall affix his personal lockout/tagout device to a group lockout box or comparable device before beginning work and shall remove his/her personal lockout/ tagout device upon completion of work.
- If there is more than one group of personnel working a machine or piece of equipment, an employee

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shall be designated to coordinate and take responsibility for all the individual groups.

SHIFT AND/OR PERSONNEL CHANGES

In the event that Energy Control Procedures must extend into the next shift or if there are individual or group personnel changes, the procedures listed below will be implemented in the order listed:

- If the energy isolation device will accept two lockout/tagout devices:
 - o The authorized employee coming on duty will place his personalized lockout/tagout device in place, and
 - o After the above step has been completed, the employee going off duty will remove his lockout/tagout device.
- If the energy isolation device will not accept two lockout/tagout devices, both the incoming and outgoing authorized employees will:
 - o Ensure that all affected employees are aware that a lockout/tagout change is about to take place, then
 - o Ensure that the area is clear of tools and affected employees, then
 - o The outgoing authorized employee will remove his lockout/tagout devices and immediately the incoming authorized employee will install his lockout/tagout devices, and
 - o The incoming authorized employee will inform the affected employees that the change has been completed.

Following the above procedure will ensure the energy isolating device was never disturbed and that complete control of hazardous energy was maintained. The above procedure provides for continuing protection for both incoming and outgoing employees from the potential hazards of the unexpected release of hazardous energy and an orderly transfer of lockout/tagout responsibilities.

PERIODIC INSPECTIONS

The EHS Specialist/Manager will conduct periodic inspections of this Control of Hazardous Energy Program at least annually to ensure that the procedures and requirements of 29 CFR 1910.147 are being followed. The information gleaned from the periodic inspection will be used to correct any deviations or inadequacies identified.

These inspections will be documented and certification will be prepared to identify the machine or equipment on which an energy control procedure was utilized, the date of the inspection, the employees included in the inspection, and the name of the person performing the inspection.

It should be noted that all periodic inspections shall be conducted by a competent person designated by the EHS Specialist/Manager other than the person who actually used the energy control procedure being inspected.

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Training

Control of Hazardous Energy training will be documented giving the name of the trainer, the name of the trainee, and the date. Authorized employees must be familiar with this program and will receive adequate training in the following areas: recognition of all applicable hazardous energy sources, types and magnitude of energy sources, methods and means necessary for energy isolation and control, and changes to our program.

All affected employees will be instructed in the purpose and use of the energy control procedures. Additionally, training will be provided for any other employee whose work operations are or may be in an area where energy control procedures are being utilized. Training will include tagout systems and the limitations of a tag (tags are warning devices and do not provide physical restraint). Tags should not be removed without authorization and tags are never to be ignored or defeated in any way.

Retraining will be conducted when a periodic inspection reveals inadequacy in an authorized employee's knowledge; there has been a deviation from established policy or procedure; or our procedures are changed.

Additionally, retraining will be given when there is a change in job assignments, machines, energy control procedures or a new hazard is introduced.

All training and retraining will be documented, signed and certified.

All training will be interactive with applicable standards readily accessible.

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Energy Isolation (LO/TO) Permit

OME
No.

General Information	
Project/Customer Name:	Job #:
Project/Customer Name	Job #:
Date	
Description of Work	
List of Equipment Out of Service	
Means and methods to achieve proper energy isolation (e.g. double block/bleed, tag only, etc.)	
Authorized Employee	Authorized Employee Signature
Checklist	
Field Risk Assessment (JSA) for this work active/complete?	If no, why?
Equipment properly locked out?	If no, why?
Is the proper equipment locked out?	If no, why?

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Energy Isolation (LO/TO) Permit

No.

"Danger - Do Not Operate Tag" installed and properly completed?	If no, why?
List of isolation points completed on the Lockout Plan?	If no, why?
Are keys under proper control?	If no, why?
Was equipment tried and verified to be de-energized?	If no, why?
Procedure discrepancies reviewed with affected personnel?	If no, why?
Exposed electrical parts tested, if applicable?	If no, why?
LO/TO Sign On	
LO/TO Sign Off	
Customer or Plant Contact Acknowledgment	
Customer or Plant Contact Available?	If no, explain
Customer or Plant Contact Name	
Customer Close Out Comments:	
Groome Close Out Comments:	

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Purpose

Sustainability is a new way of thinking about an age-old concern: ensuring that our children and grandchildren inherit a tomorrow that is at least as good as today, preferably better. Sustainability is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. We want to make sure that the way we live our lives is sustainable - that it can continue and keep improving for a long time.

Environmental Sustainability Mission Statement

The Company wants to be the leader in environmental sustainability within our industry and through a focused effort to become more aware of the effects our business practices, workers, business partners, subcontractors and vendors have on the environment.

Environmental Sustainability Initiatives

The Company cares about the environment and we are doing our part to make Company sustainable for future generations. We realize the process of becoming more "Green" is one that continuously evolves and by initiating our program we will make a positive difference to the environment, step by step.

All initiatives taken at each work site will be reported to the Company.

MEASURES IN PLACE FOR ENERGY CONSERVATION

Energy conservation measures should be used whenever possible. This can include shutting down equipment when it's not in use, use of energy efficient light bulbs, using new energy efficient technology, using equipment with the ENERGY STAR mark, etc. This can also include the reduction in the use of generators and using more local electrical supply, etc

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MEASURES IN PLACE FOR WATER CONSERVATION

Each Company work site will develop measures to be in place for water conservation. Water conservation measures should be used whenever possible. This can include repair on any equipment leaking water, use of a broom instead of a hose for cleaning purposes, upgrade equipment efficiency, educate employees, etc.

EFFICIENT USE OF VEHICLES AND EQUIPMENT TO MINIMIZE THE IMPACT TO THE ENVIRONMENT

The Company will make efficient use of vehicles and equipment to minimize the impact to the environment. Vehicles and equipment should be kept in good condition with up-to-date preventative maintenance, should not be left idling unnecessarily, should use alternative fuels when possible, etc. The most efficient vehicles and equipment should be used when possible.

MINIMIZING ENVIRONMENTAL IMPACTS ON THE LOCAL HABITAT WHEN ACTIVITIES MAY AFFECT THEM

The Company will always work towards minimizing environmental impacts on the local habitat when activities may affect them. When activities may affect the local animal or plant population or habitat, a plan shall be in place to minimize any environmental impact to them. The plan is to be reviewed and approved by the site manager prior to work beginning. Adherence to any client specific requirements shall also be followed.

EFFICIENT USE OF MATERIALS IN ORDER TO MINIMIZE WASTE

Efficiency

We must make efficient use of materials in order to minimize waste. An efficient material management system should be used to reduce the impact on the environment by limiting the amount of materials that are used, left over as waste, or transported.

Purchasing Products with Minimal Impact on the Environment When Available

The Company will emphasize purchasing products with minimal impact on the environment when available. Company should take into consideration the impact a product has on the environment before purchasing. Preference should be given to products that minimally impact the environment, made of recycled, renewable material, energy-efficient, etc. Local purchasing will also reduce the amount of emissions and fuel used as compared to purchasing involving shipment from more distant locations.

Recycling

Each Company work site will develop measures to be in place for recycling. Besides recycling paper, cardboard, fluids, tires and plastics at our facilities we also want to recycle used engine oil, treat or recycle solvents, etc.

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MEASURES IN PLACE FOR LIMITING GREENHOUSE GAS EMISSIONS

Each Company work site should develop a program for limiting greenhouse gases. The program should address implementing procedures to protect the climate. This includes limiting the amount of greenhouse gases by use of low-emission technologies, driving less or carpooling, and use of renewable energy.

Site managers are responsible to take steps to help reduce greenhouse gas emissions, fuel consumption, decrease wasted expenditures in fuel and maintenance and improve efficiency.

Employee Awareness

All Company workers will be made aware of our sustainability efforts and asked for their input for additional methods to protect the environment while we conduct our work.

Purpose

The purpose of this program is to provide fall protection procedures to prevent injury to employees while performing work assignments at elevated levels.

QUALIFICATIONS OF THE PERSON OR POSITION THAT PREPARES FALL PROTECTION PLANS

Any preparation or changes to this Fall Protection Program must be approved by the Safety Manager, who is designated the Qualified Person to prepare plans for specified work sites. This is based on training received in fall protection equipment, planning and has demonstrated skills and knowledge in the preparation of fall programs, plans and the hazards involved.

Scope

Guardrails, safety nets, or personal fall arrest systems shall be used where feasible. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

"Anchorage" means a secure point of attachment for lifelines, lanyards or deceleration devices.

"Body belt (safety belt)" means a strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

"Body harness" means straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest and shoulders with means for attaching it to other components of a personal fall arrest system.

"Buckle" means any device for holding the body belt or body harness closed around the employee's body.

"Carabineer" - see Snaphook

"Connector" means a device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabineer, or it may be an integral component of part of the system (such as a buckle or D-ring sewn into a body belt or body harness, or a snap-hook spliced or sewn to a lanyard or self-retracting lanyard).

"Deceleration device" means any mechanism, such as a rope grab, rip-stitch lanyard, specially-woven lanyard, tearing or deforming lanyards, automatic self-retracting lifelines/lanyards, etc., which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

"Deceleration distance" means the additional vertical distance a falling employee travels, excluding lifeline elongation and free fall distance, before stopping, from the point at which the deceleration device begins to

operate. It is measured as the distance between the location of an employee's body belt or body harness attachment point at the moment of activation (at the onset of fall arrest forces) of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.

"Equivalent" means alternative designs, materials, or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

"Failure" means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

"Free fall" means the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

"Free fall distance" means the vertical displacement of the fall arrest attachment point on the employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

"Guardrail system" means a barrier erected to prevent employees from falling to lower levels.

"Infeasible" means that it is impossible to perform the inspection work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

"Lanyard" means a flexible line of rope, wire rope, or strap which generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline, or anchorage.

"Leading edge" means the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

"Lifeline" means a component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline), and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

"Lower levels" means those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

"Personal fall arrest system" means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these.

"Positioning device system" means a body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

"Rope grab" means a deceleration device which travels on a lifeline and automatically, by friction, engages the lifeline and locks so as to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

"Safety Nets" shall be provided when workplaces are higher than 25 feet above ground or water surfaces or other surfaces where the use of ladders, scaffolds, catch platforms, temporary floors, safety lines or safety belts are impractical.

Nets shall extend 8 feet beyond the edge of the work surface where employees are exposed and shall be installed as close under the work surface as practical but in no case more than 25 feet below the work surface. Nets shall be positioned in a manner to prevent the user from coming into contact with below surfaces or structures. Proper clearance positioning of nets shall be determined by impact load testing. Work procedures shall not begin until nets are in place and have been properly tested.

New nets shall meet accepted performance standards of 17,500 foot pounds minimum impact resistance as determined and certified by the manufacturers and shall bear a label of proof test. Edge ropes shall provide a minimum breaking strength of 5000 pounds.

"Self-retracting lifeline/lanyard" means a deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under slight tension during normal employee movement, and which, after onset of a fall, automatically locks the drum and arrests the fall.

"Snaphook" means a connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types: (1) The locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or (2) The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. As of January 1, 1998, the use of a non-locking snaphook as part of personal fall arrest systems and positioning device systems is prohibited.

"Unprotected sides and edges" means any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches (1.0 m) high.

"Walking/working surface" means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

"Work area" means that portion of a walking/working surface where job duties are being performed.

DRAWING OF COMPONENTS



Figure A

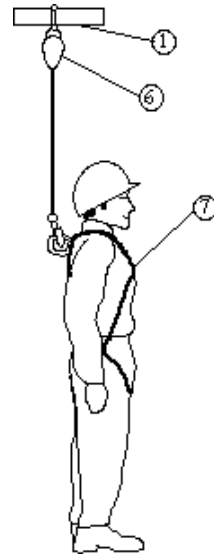


Figure B

1. Tie-off Point
2. Lifeline
3. Rope Grab
4. Shock Absorbing Lanyard
5. Cross-Arm Strap
6. Retractable Lifeline
7. Full-Body Harness
8. Restraining Belt
9. Restraining Lanyard
10. Carabineer

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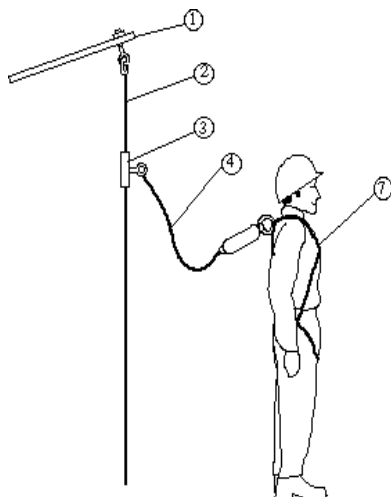


Figure C

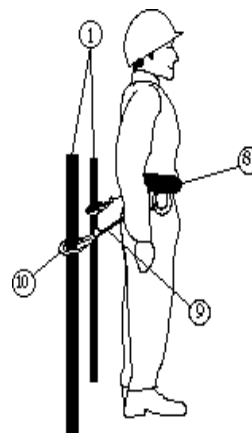


Figure D

Responsibilities

OPERATIONS MANAGER

It is the responsibility of the Operations Manager (designated competent person) to implement this Fall Protection Program. Continual observational safety checks of work operations and the enforcement of the safety policy and procedures shall be regularly enforced. All jobs shall be pre-planned prior to the start of work.

SUPERVISOR

- Supervisors shall make exposure determinations and shall discuss with their employees the extent to which scaffolds, ladders or vehicle mounted work platforms can be used.
- Ensure that fall protection equipment is available and in safe working condition.
- Provide emergency rescue in the event of a fall. Pre-plan the job to ensure that employees have been properly trained in the use, limitations, inspections and rescue procedures and that training records are on file.

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EMPLOYEES

- Understand the potential hazards of working at elevated levels as well as gaining access to and from the work location.
- Understand the use and limitations of such equipment.
- Pre-plan the job with his/her supervisor to agree that the job can be done safely.
- Inspect such equipment before each use and report defective equipment immediately to their supervisor.

Procedure

WHEN FALL PROTECTION MUST BE PROVIDED FOR EMPLOYEES

Fall protection must be provided when Groome/Expro employees work at heights of **four (4) feet** or greater.

Fall protection is required whenever employees are potentially exposed to fall hazards from heights that exceed the applicable regulatory thresholds. Fall protection includes guard rails, safety nets, personal fall arrest systems and other accepted forms of fall protection.

FALL PROTECTION EQUIPMENT

Company only utilizes fall protection equipment that meets the requirement of OSHA, ANSI, or ASTM where required.

The following are minimum standards for Company employee personal fall protection systems:

- All D-rings must be a minimum of 2¼ inches (inside diameter).
- All snap hooks shall not allow pressure to be applied to the gate in the opening direction.
- No pelican hooks on lanyards should be used as a primary connection.
- Connectors shall be drop forged, pressed or formed steel, or made of equivalent materials.
- Connectors shall have a corrosion-resistant finish, and all surfaces and edges shall be smooth to prevent damage to interfacing parts of the system.
- D-rings and snap hooks shall have a minimum tensile strength of 5,000 pounds.
- D-rings and snap hooks shall be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.
- Snap hooks shall be sized to be compatible with the member to which they are connected to prevent unintentional disengagement of the snap hook. Only a locking type snap hook designed and used to prevent disengagement of the snap hook by the contact of the snap hook keeper by the connected member shall be used.
- Horizontal lifelines shall be designed, installed, and used, under the supervision of a qualified person,

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as part of a complete personal fall arrest system, which maintains a safety factor of at least two.

- Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds. Where vertical lifelines are used, each employee shall be attached to a separate lifeline.
- Lifelines shall be protected against being cut or abraded.
- Self-retracting lifelines and lanyards which automatically limit free fall distance to 2 feet or less shall be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Self-retracting lifelines and lanyards which do not limit free fall distance to 2 feet or less, rip stitch lanyards, and tearing and deforming lanyards shall be capable of sustaining a minimum tensile load of 5,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per employee attached, or shall be designed, installed, and used as part of a complete personal fall arrest system which maintains a safety factor of at least two and under the supervision of a qualified person.
- Systems used by an employee having a combined person and tool weight in excess of 310 pounds shall be modified to provide proper protection for such heavier loads.
- The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level, or above the wearer's head, except when climbing.
- Body harnesses and components shall be used only for employee protection and not to hoist materials.
- Provide for prompt rescue of employees in the event of a fall or assure that employees are able to rescue themselves.
- Personal fall arrest systems shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.
- Personal fall arrest systems shall not be attached to guardrail systems, nor shall they be attached to hoists unless prior approval is obtained from a competent person.
- If and when a personal fall arrest system is used at hoist areas, it shall be rigged to allow the movement of the employee only as far as the edge of the walking/working surface.

REMOVING PERSONAL FALL ARREST SYSTEMS FROM SERVICE WHEN SUBJECTED TO IMPACT LOAD

Personal fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection until inspected and determined by a competent person to be undamaged and suitable for reuse.

PROTECTION FROM FALLING OBJECTS

When employees are required to work in the near vicinity of others working with materials, tools, or equipment at elevated levels, Barricades around the immediate area of the overhead work shall be erected to prohibit employees from entering the barricaded area.

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Employees performing work at elevated levels shall keep tools, materials, and equipment away from the edge to keep potential objects from falling over the side. Where practical, tools, etc. shall be secured with rope, wire, etc. to keep them from falling.

STORAGE

A dedicated storage area shall be provided for the storage of fall protection equipment and all components. The storage area shall keep the equipment clean, dry, and free from oils, chemicals, paints, and excessive heat.

INSPECTIONS

Fall protection equipment shall be inspected before each use for wear, damage, other deterioration, or other defects.

ELEVATED PERSONNEL PLATFORMS

Work performed, regardless of the nature of the work, from personnel platforms raised by forklifts, cranes, scissor lifts, etc., shall require the use of a full body harness and shall be connected to the platform.

PROMPT RESCUE OF AN EMPLOYEE IN THE EVENT OF A FALL

COMPANY requires the prompt rescue of employees who have fallen or shall assure that employees can perform self-rescue.

The pre-planning stage prior to the beginning of each elevated work assignment shall be evaluated by the supervisor to provide rescue of employees involved in a fall.

FALL PROTECTION PLAN

This option is available only to employees engaged in leading edge work who can demonstrate that it is infeasible, or it creates a greater hazard to use conventional fall protection equipment. The fall protection plan shall conform to the following provisions:

- The fall protection plan shall be prepared by a qualified supervisor and developed specifically for the site where the leading-edge work is being performed.
- The fall protection plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety net systems) are infeasible or why their use would create a greater hazard.
- The fall protection plan shall identify each location where conventional fall Protection methods cannot be used.
- These locations shall then be classified as controlled access zones.

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REQUIREMENTS FOR THE USE OF CONTROLLED ACCESS ZONES

Where other methods of fall protection are not utilized, those areas must be designated as controlled access zones and a safety monitoring system used.

In reference to controlled access zones, a competent person must be designated to identify fall hazards, warn employees unaware of fall hazards or performing in an unsafe manner, be on the same working surface and within visual sight, close enough for verbal communication and not be assigned other duties that might interfere with the monitor's ability to perform the monitor's designated duties.

Company is required to identify a competent person to serve as a safety monitor and include the following requirements at a minimum:

- The safety monitor shall be competent to recognize fall hazards;
- The safety monitor shall warn the employee when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner;
- The safety monitor shall be on the same walking/working surface and within visual sighting distance of the employee being monitored;
- The safety monitor shall be close enough to communicate orally with the employee; and;
- The safety monitor shall not have other responsibilities which could take the monitor's attention from the monitoring function.

Mechanical equipment must not be used or stored in areas where safety monitoring systems are being used to monitor employees engaged in roofing operations on low-slope roofs.

No employee, other than an employee engaged in roofing work [on low-sloped roofs] or an employee covered by a fall protection plan, shall be allowed in an area where an employee is being protected by a safety monitoring system.

Each employee working in a controlled access zone shall be directed to comply promptly with fall hazard warnings from safety monitors.

The control line shall be connected on each side to a guardrail system or wall.

- Control lines shall consist of ropes, wires, tapes, or equivalent materials.
- Each line shall be flagged or otherwise clearly marked at not more than 6-foot (1.8 m) intervals with high-visibility material.
- Each line shall be rigged and supported in such a way that its lowest point (including sag) is not less than 39 inches (1 m) from the walking/working surface and its highest point is not more than 45 inches (1.3 m).
- Each line shall have a minimum breaking strength of 200 pounds.

USE OF A SAFETY MONITORING SYSTEM

Company will designate a competent person to monitor the safety of other employees and ensure that the safety monitor complies with the fall protection plan.

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PROCESS USED TO CONDUCT ACCIDENT AND SERIOUS INCIDENT INVESTIGATIONS

This plan requires Company to investigate accidents and serious incidents and develop and implement corrective actions.

Company will utilize its Incident Investigation and Reporting system that requires:

- Obtain medical aid first for any injured person.
- Freeze the scene as much as possible for investigation purposes.
- Have appropriate witness provide written statements and check all involved equipment.
- Review all permits or other documents involved in the incident.
- The Safety Manager will create a review of the incident to determine if the fall protection plan needs to be changed and shall implement those changes to prevent similar types of incidents.

Training

Company requires training to be conducted and documented for affected employees on the recognition and mitigation of fall hazards and that retraining must occur when there are deficiencies in training, changes in the work place, or changes in the equipment used, or fall protection systems that render previous training moot.

Company requires it shall provide training for each affected employee who has the potential to be exposed to fall hazards. The provided training shall enable each affected employee to recognize the hazards related to falls and the procedures affected employees must use to mitigate those hazards.

Retraining must occur when there are deficiencies in training, when changes occur that effect work practices, when changes in equipment are made, or when fall protection systems used render the previous training moot.

The conducted training must be documented and retained. Documentation must include at a minimum, the participants, dates of training, and signatures of the instructors conducting the training.

Training records shall be retained in the corporate office.

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Purpose

To ensure our employees recognize the effect of fatigue as related to their safety on the job and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations. When Company employees are working in locations that have more stringent standards, The Company will comply with those standards. This procedure is intended to provide the minimum expectations across all Company locations.

Scope

This program applies to all Company projects and operations.

Policy

The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:

- Employees must be in a fit state to undertake work
- Employees must be fit to complete work
- Employees must take minimum periods of rest to safely perform their work

These principles will be managed through:

- The appropriate planning of work tasks, including driving, vehicle and equipment maintenance, loading and unloading and other job-related duties and processes
- Providing appropriate equipment to help reduce stress and fatigue
- Regular medical checkups and monitoring of health issues as required by legislation
- The provision of appropriate sleeping accommodations where required
- Ongoing training and awareness of employee health and fatigue issues

Key Responsibilities

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COMPANY MANAGEMENT

- Management accepts responsibility for the implementation of this fatigue management policy.

SITE MANAGER

- Responsible for the implementation and maintenance of this program for their site and ensuring all assets are made available for compliance with the program.

EMPLOYEES

- Employees must present in a fit state free from alcohol and drugs.
- Employees must not chronically use over the counter or prescription drugs to increase mental alertness.
- Employees are prohibited from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off.
- Workers shall report tiredness/fatigue to supervisor and, supervisor shall take appropriate action to assist the worker.
- Employees must report fatigue/tiredness and lack of mental acuity to supervisor. Supervisors must take appropriate actions to prevent loss.
- Employees need to be rested prior to starting work.
- Employees need to monitor their own performance and take regular periods of rest to avoid continuing work when tired.

Work Hour Limitations

Company has set the following work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and to increase mental fitness.

1. Every Employee shall have necessary work breaks to avoid fatigue. These scheduled breaks will apply to both driving and on-site hours. The following shall be a minimum:
 - 15 minutes each 2.5 hours
 - 30 minutes after 5 Hours
 - 30 minutes after 10 Hours
2. No Workers shall be required to work more than:
 - 12 hours per day
 - 13 continuous days
3. Unfamiliar or irregular work should be avoided.

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Equipment and Evaluation

The Company will provide equipment such as anti-fatigue mats for standing, lift-assist devices for repetitive lifting and other ergonomic devices as deemed appropriate, chairs for workers to sit periodically and will provide periodic rest breaks for personnel. Company will also periodically evaluate and improve work tasks to control fatigue.

Training

The Company is committed to ensuring that all employees are competent to perform their tasks including:

- Fatigue management and health issues.
- The Company will provide initial and annual training on how to recognize fatigue, how to control fatigue through appropriate work and personal habits and reporting of fatigue to supervision.

A record of individual fatigues training and competency will be maintained.

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Purpose

The purpose of this program is to provide fire extinguisher procedures to ensure equipment is operable and employees have the knowledge to safely operate in case of a fire incident.

Scope

This program shall apply to all Company employees, and to all Company locations.

Responsibilities

The EHS Manager is responsible for developing procedures for the use and care of fire extinguishers and for developing a training program for the proper use of these devices. The Manager is responsible for implementing fire extinguisher training at his location. Foremen Supervisors are responsible for enforcing the provisions of this section of the safety manual. All employees are responsible for following these provisions.

Procedure

SELECTION AND DISTRIBUTION

Portable fire extinguishers shall be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of the hazard which would affect their use. Fire extinguishers used by this company are for four classes of fires:

- Class A Fire Extinguisher. Use on ordinary combustibles or fibrous material, such as wood, paper, cloth, rubber and some plastics. Travel distance for employees to any extinguisher is 75 feet (22.9 m) or less.
- Class B Fire Extinguishers. Use on flammable or combustible liquids such as gasoline, kerosene, paint, paint thinners and propane. Travel distance from the Class B hazard area to any extinguisher is 50 feet (15.2 m) or less.
- Class C Fire Extinguishers. Use on energized electrical equipment, such as appliances, switches, panel boxes and power tools. Travel distance from the Class C hazard area to any extinguishing agent is 50 feet (15.2 m) or less.
- Class D Fire Extinguishers. Use on combustible metals, such as magnesium, titanium, potassium and sodium. Travel distance from the combustible metal working area to any extinguishing agent is

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75 feet (22.9 m) or less.

LABELING OF FIRE EXTINGUISHERS

Fire extinguishers are to be mounted in easily accessible locations that are indicated by a sign that reads "Fire Extinguisher". Fire extinguishers are to be located so that no employee will ever be more than 75 feet from an extinguisher. No equipment, boxes or product may be placed (even temporarily) in the way of a fire extinguisher. Each fire extinguisher will be assigned a unique number.

MAINTENANCE

All fire extinguishers weighting less than 40 pounds should be mounted so that the top is not more than five feet above the ground, but no lower than 4 inches above the floor. No fire extinguisher should ever be mounted less than less than 4 inches above the floor. All fire extinguishers shall be maintained as follows:

- Numbered to identify their proper location
- Fully charged and in operable condition
- Clean and free of defects
- Readily accessible at all times

INSPECTION, MAINTENANCE AND TESTING

All fire extinguishers are to be visually inspected by Company employees monthly. All fire extinguishers are to receive an annual maintenance check by certified personnel from a fire extinguisher dealer. Fire extinguishers are to be inspected and re-charged by certified personnel after any use.

Any fire extinguisher that shows a loss of pressure during the monthly inspection will be inspected and re-charged by certified personnel. Completed fire extinguisher inspection logs will be maintained in the safety files and become a part of the safety records. They are to be maintained for 5 years.

USE

In the event of a fire, one employee will get the nearest fire extinguisher and use it to attempt to put the fire out. All other employees in the immediate area will prepare to evacuate if needed. All other employees in the building need to be advised that a fire is in progress.

The employee attempting to extinguish the fire will break the safety seal on the handle and pull the pin. He will then aim his extinguisher at the base of the fire and discharge it with a sweeping motion from side to side; continuing until the fire is out or the extinguisher is emptied.

Remember that a standard fire extinguisher will be emptied in about 10 to 15 seconds. If the fire is not out when the extinguisher has been completely discharged, the employees must evacuate the area.

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TRAINING AND EDUCATION

The purpose of this section is to establish training procedures which are necessary for the proper use and understanding of a fire extinguisher and incipient stage fire fighting. Training will occur prior to initial assignment and at least annually thereafter.

On even numbered years, this training will be conducted by a member of the local fire department (where possible) and will include "live fire" hands-on use of the extinguisher. On odd number years, this training will be conducted by the EHS Specialist/Manager and will include a demonstration of the use of a fire extinguisher, without actually discharging the unit.

New employees will be given the odd number year training upon hire.

Initial Training Outline

- General principles of a fire
- Hazards employed with an incipient stage fire(s)
- When to "back off" (evacuate) of an incipient stage fire(s)
- General fire principles of a fire extinguisher
- Hazards employed with the use a fire extinguisher
- Use of a fire extinguisher

Retraining

Retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary. Retraining shall be provided for all authorized and affected employees whenever there is:

- An annual basis or
- A change in job assignment or
- Company has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of fire extinguishers or fire prevention procedures.

Training Documentation

- All training will be documented and each employee's understanding will be subject to a "hands-on" test.
- Documentation will consist of, as a minimum, the employee's name, the trainer's name, the date of the training, and an outline of training provided.

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Purpose

The purpose of this program is to establish the minimum first aid supplies, equipment, and actions to properly respond to injuries.

Scope

This program is applicable to all Company employees while engaged in work at Company facilities and/or facilities operated by others.

Responsibilities

- It is the responsibility of the site manager to ensure that first aid kits are provided and maintained.
- All employees are responsible for using first aid materials in a safe and responsible manner.
- The EHS Manager/Specialist is responsible for corresponding with the Red Cross or an equivalent training provider to keep employee training levels current.

Requirements

PLANNING

The site manager will:

- Ensure that a minimum of one employee, with a valid certificate, shall be present to render first aid at all times work is being performed if medical assistance is not available within 3-4 minutes.
- Ensure that provisions shall have been made prior to commencement of a project for prompt medical attention, including transportation, in case of serious injury.
- Ensure adequate first aid supplies and equipment are easily accessible when required.
- Ensure that when an infirmary, clinic, or hospital is not in proximity that first aid providers will be made available and trained to render first aid. The Company will provide a person or persons available and adequately trained to render first aid when an infirmary, clinic, or hospital is not in near proximity.

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PERSON(S) RESPONSIBLE FOR TRAINING AND RENDERING FIRST AID

All minor first aid is to be self-rendered. Because of the risks presented by certain bloodborne pathogens, no one is allowed to tend the minor injuries of another.

First aid providers must be trained and certified through a reputable agency such as the American Red Cross or equivalent and that the training be documented. The Company first aid providers be a person or persons who have a valid certificate in first-aid training from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence.

Employees authorized to render first aid will always observe universal precautions. (Universal Precautions means that the aid giver treats all bodily fluids as if they were contaminated).

POSTING EMERGENCY PHONE NUMBERS AT JOB SITE

In areas where 911 is not available, the telephone numbers of the physicians, hospitals, or ambulances shall be conspicuously posted.

All Company authorized first responders shall have a cell phone as a means of communications; otherwise handheld radios or telephones shall be used as a means of communication.

AVAILABILITY OF FIRST AID SUPPLIES

First aid supplies must be readily available and easily accessible when required.

HOW FIRST AID ITEMS ARE STORED AND CHECKED

First aid kits shall be placed in a weatherproof container with individual sealed packages of each type of item and shall be checked by Company before being sent out on each job and at least weekly on each job to ensure that the expended items are replaced.

See Minimum First Aid Contents Table.

First aid supplies and kits must be supplied and inspected to ensure that there are adequate supplies and for construction and other activities that inspections occur before being sent to job sites and at least on a weekly basis.

EYEWASH EQUIPMENT

When the eyes or body of any person may be exposed to corrosive materials emergency eyewash equipment must be available.

Company is to provide suitable facilities for eye washing when employees may be exposed to corrosive materials that are or could be injurious to the body or eyes of workers.

An assessment of the material or materials used shall be performed to determine the type flushing/drenching equipment required. At client job sites, portable or temporary stations must be established prior to the use of corrosive materials.

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GETTING INJURED PERSONS TO A PHYSICIAN OR HOSPITAL

Services must be available to transport injured employees to a physician or hospital. The Company is to provide equipment for prompt transportation for injured Company employees to a physician or hospital or provide a communication system for contacting necessary ambulance services.

Transportation needs must be preplanned prior to an incident requiring such service.

Training

Volunteers or selected employees are trained by the American Red Cross or equivalent in CPR and first aid. Each of these trained and certified employees shall be equipped with protective gloves and other required paraphernalia.

MINIMUM FIRST AID CONTENTS TABLE

Basic Fill Contents for Type I, II and III Kits

Item & Minimum Size or Volume	Minimum Quantity
Absorbent Compress, 32 sq. In. (No side smaller than 4")	1
Adhesive Bandages, 1" x 3"	16
Adhesive Tape, 5 yd.	1
Antiseptic, .5g application	10
Burn Treatment, .5g application	6
Medical Exam Gloves	2 pr.
Sterile Pads, 3" x 3"	4
Tourniquet	1
Triangular bandage, 40" x 40" x 56"	1

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Purpose

To establish our expectations for an employee's fitness for duty.

Scope

This program applies to all Company projects and operations.

Requirements

It is the goal of the Company to provide a safe workplace for all employees. To accomplish this goal we have adopted the following fitness for duty policy requirements:

- Pre-employment physicals should be included in the hiring process and also when changing into certain job functions and different environments. Such physicals should be based on the employee's expected job duties.
- Employees must receive training specific to their assigned task. Examples might be welding, instrumentation, scaffold building, equipment operator qualifications, etc. All training is to be documented.
- Procedures must include and be implemented for drug and alcohol testing as prescribed by DOT or the host client facilities.
- Safe work procedures must be in place prior to work beginning. Examples might include, hot work permitting, confined space, lockout tagout, process safety management, electrical safety, operator safety.
- Employees must report all medications they are taking. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor.
- Employee's activities and behaviors will be monitored to determine if employee should be removed from the work site if their ability to perform their duties safely is questioned.
- Employees must be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers.

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FOREIGN MATERIAL EXCLUSION			Revision No.	3
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Purpose

The Company is required to participate as a contract employer in the foreign material exclusion program. The Company has no facilities with such requirements, however, has a duty to ensure Company or its contractors are aware of the procedure to control introduction of foreign material into critical plant systems and components in order to minimize the potential for damage to equipment, increase equipment reliability, and reduce equipment downtime.

Key Responsibilities

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her regions are required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Procedure

OBTAIN PERMISSION TO WORK IN ADVANCE

Prior to performing work within foreign material exclusion zone, permission must be obtained from the owner client FME Coordinator to make final determination to the FME requirements for Contractor work. If required, complete a client work permit prior to beginning work. Company shall provide copies of all FME records at the completion of work.

RESPONSIBILITY

Company employees working at FME work zones shall participate in all basics concepts or fundamentals of an FME program as directed by client:

- Cleanliness : A housekeeping mentality and equipment made from easily cleanable material are key in many FME jobs.
- Equipment Inspection: It's important that the equipment used in FME programs is inspected with the proper frequency.
- Prevention: Making it impossible for a mistake to occur is the best way to prevent an incident.

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- **Retrievability:** How easy something is to retrieve can sometimes determine if it's suitable for use in protected areas.
- **Visibility:** If it's easy to see, it's easy to locate and retrieve, or more importantly, faster to retrieve.
- **Asset Tracking:** A good tracking program is essential in detecting and learning from loss of prevention controls.
- **Human Element:** They can be minimized through workplace culture and proper management techniques.

Procedure

The Company FME program addresses common challenges and provides ways that our employees can control them through common FME application such as:

- Barrier creation
- Parts and equipment storage
- Tools lanyard
- Inspection and retrieval
- Welding debris control
- Promoting FME

Training

Awareness training describing responsibilities and roles in preventing entry of foreign material into a system or component shall be provided to all applicable employees. Assessments shall be used to determine whether the employees have the knowledge and have demonstrated skills to safely perform their work assignments.

Retraining and testing shall be required for unsatisfactory/unsafe performance of job assignments.

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FORKLIFTS- POWERED INDUSTRIAL TRUCKS			Revision No.	3
			Next Revision Date:	8/01/2025
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Purpose

The purpose of this program is to establish requirements for the safe operation and use of Powered Industrial Trucks commonly referred to as “forklifts.”

Scope

This program applies to all Company employees who operate a Powered Industrial Truck in the scope of their job duties and assignments. When work is performed on a non-owned or operated site, the operator’s program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator’s program doesn’t exist or is less stringent. NOTE: Only trained and certified operators, including supervisors, are allowed to operate forklifts and industrial trucks. The Company shall certify all authorized employees regarding competency on all types of equipment.

Definitions

Authorized Employee – A person, at least 18 years of age and who has completed the company’s required safety training for the safe operations of forklifts.

Forklift (Powered Industrial Truck) – Any mechanical device used for the movement of supplies, material or finished a product that is powered by an electric motor or an internal combustion engine to include Class 7 rough- terrain forklifts also referred to as “telehandlers.”

Key Responsibilities

MANAGER/SUPERVISOR

- Shall ensure that each powered forklift operator is competent to operate a forklift safely, as demonstrated by the successful completion of the training and evaluation program.

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- Shall ensure that all forklifts are inspected before each shift and all repairs are made before the forklift is operated.

EMPLOYEES

- Shall be current on applicable training.
- Operate forklift in accordance to the forklift standards and manufacture requirements.
- Inspect forklift at the start of shift, and remove from service if defects are found until they are corrected.
- Operate forklift in a safe manner.

Procedure

GENERAL

All approved forklifts shall have a manufactures identification plate attached showing all specifications of the forklift and that the forklift is accepted by a nationally recognized testing laboratory.

Modifications and additions, that affect capacity and safe operation, shall not be performed without manufacturer's prior written approval. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed reflect the modification or addition.

If the forklift is equipped with front-end attachments other than factory installed attachments, the supervisor shall ensure that the forklift is marked to identify the attachments and show the approximate weight of the forklift and attachment combination at maximum elevation with load laterally centered.

The operator shall see that all nameplates and markings are in place and are maintained in a legible condition.

All forklifts shall be equipped with safety seat belts. All forklifts shall be equipped with a horn, backup alarm, beacon light, headlights and taillight.

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SAFETY GUARDS

Forklifts shall be fitted with an overhead rollover cage, as per manufactures specifications.

If the type of load presents a hazard to the operator, the forklift shall be equipped with a vertical load backrest extension, as per manufactures specifications.

Operations

Inspection of Forklifts

- Operators shall complete a documented inspection before each shift using the Go Canvas "Forklift Inspection" form app. (An example form is included in Appendix A of this document).
- Defects when found shall be immediately reported to the supervisor and corrected before operating the forklift.

Maintenance of Forklifts

- Only authorized personnel shall perform maintenance and make repairs.
- Those repairs to the fuel and ignition systems of forklifts, which involve fire hazards, shall be conducted only in locations designated for such repairs.
- Forklifts in need of repairs to the electrical system shall have the battery disconnected prior to such repairs.
- Only parts equivalent with those used in the original design shall replace all parts of any forklift requiring replacement parts.
- Forklifts shall not be altered so that the relative positions of the various parts are different from what they were when originally received from the manufacturer, nor shall they be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts.
- Additional counter weighting of fork trucks shall not be done unless approved by the truck manufacturer.
- Forklifts shall be inspected before being placed in service, and shall not be placed in service if the inspection shows any condition adversely affecting the safety of the forklift.
- Operators must ensure the vehicle is safe prior to operating.
- When the temperature of any part of any forklift is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the forklift shall be removed from service and not returned to service until the cause for such overheating has been eliminated.
- Forklifts shall be kept in a clean condition, free of lint, excess oil, and grease.
- Noncombustible agents, where at all possible, shall be used for cleaning trucks.

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- Low flash point (below 100 degrees F.) solvents shall not be used.
- High flash point (at or above 100 degrees F.) solvents may be used if precautions regarding toxicity, ventilation, and fire hazard are mitigated with the agent or solvent used.

Safe Work Practices

- All operators shall wear a safety seat belt when operating a forklift.
- Forklifts shall not be driven up to anyone standing in front of a bench or other fixed object.
- No person shall be allowed to stand or pass under the elevated portion of any forklift, whether loaded or empty.
- Unauthorized personnel shall not be permitted to operate forklifts.
- No riders or passengers are permitted.
- It is prohibited for arms or legs to be placed between the uprights of the mast or outside the running lines of the forklift.
- When a forklift is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, and brakes set.
- Wheels shall be blocked if the forklift is parked on an incline.
- A forklift is unattended when the operator is 25 ft. or more away from the vehicle, which remains in view, or whenever the operator leaves the forklift and it is not in view.
- When the operator of a forklift is dismounted and within 25 ft. of the forklift still in view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement.
- A safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock, or platform or freight car.
- Forklifts shall not be used for opening or closing freight doors.
- Brakes shall be set and wheel blocks shall be in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading.
- Fixed jacks may be necessary to support a semi trailer during loading or unloading when the trailer is not coupled to a tractor.
- The flooring of trucks, trailers, and railroad cars shall be checked for breaks and weakness before they are driven onto.
- There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
- An overhead guard (cages) shall be used as protection against falling objects.
- An overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., representative of the job application, but not to withstand the impact of a falling capacity load.
- Fire aisles, access to stairways, and fire equipment shall be kept clear.
- If at any time a forklift is found to be in need of repair, defective, or in any way unsafe, the forklift shall be taken out of service until it has been restored to safe operating condition.

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- Fuel tanks shall not be filled while the engine is running.
- Spillage of oil or fuel shall be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.
- When fueling with Liquefied Petroleum Gas (LPG), precautions and handling requirements set forth in the "Safe Handling of LPG" program shall be followed.
- No forklift shall be operated with a leak in the fuel system.
- Open flames shall not be used for checking electrolyte level in storage batteries or gasoline level in fuel tanks.

Traveling

- The operator shall slow down and sound the horn at cross isles and other locations where vision is obstructed.
- If the load being carried obstructs forward view, the operator shall be required to travel with the load trailing.
- The operator shall be required to look in the direction of, and keep a clear view of the path of travel.
- Grades shall be ascended or descended slowly.
- When ascending or descending grades in excess of 10 percent, loaded forklifts shall be driven with the load upgrade.
- On all grades the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.
- Under all travel conditions the forklift shall be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay are prohibited.
- The operator shall slow down for wet and slippery floors.
- Dock board or bridge plates shall be properly secured before they are driven over.
- Dock board or bridge plates shall be driven over carefully and slowly and their rated capacity never exceeded.
- While negotiating turns, speed shall be reduced to a safe level by means of turning the hand steering wheel in a smooth, sweeping motion.
- Except when maneuvering at a very low speed, the hand steering wheel shall be turned at a moderate, even rate.

Loading

- Only stable or safely arranged loads shall be handled.
- Caution shall be exercised when handling off-center loads, which cannot be centered.

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- Only loads within the rated capacity of the forklift shall be handled.
- Forklifts equipped with attachments shall be operated as partially loaded forklifts when not handling a load.
- A load engaging means shall be placed under the load as far as possible; the mast shall be carefully tilted backward to stabilize the load.
- Extreme care shall be used when tilting the load forward or backward, particularly when high tiering.
- Tilting forward with load engaging means elevated shall be prohibited except to pick up a load.
- An elevated load shall not be tilted forward except when the load is in a deposit position over a rack or stack.
- When stacking or tiering, only enough backward tilt to stabilize the load shall be used.
- Operator must verify trailer chocks, supports, and dock plates are secured prior to loading/unloading.

Training

Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee) and evaluation of the operator's performance in the workplace.

All operator training and evaluation shall be conducted by authorized persons who have the knowledge, documented training, and experience to train powered industrial truck operators and evaluate their competence.

Selected employees who have been trained shall receive refresher training and be evaluated, at a minimum, every three years.

Training shall include the following topics, except in topics for locations where they are not applicable to safe operation of the truck due to type of equipment or facility conditions.

1. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate,
2. Differences between the truck and the automobile,
3. Truck controls and instrumentation: where they are located, what they do, and how they work,
4. Engine or motor operation,
5. Steering and maneuvering,
6. Visibility (including restrictions due to loading),
7. Fork and attachment adaptation, operation, and use limitations,
8. Vehicle capacity,
9. Vehicle stability,

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10. Any vehicle inspection and maintenance that the operator will be required to perform,
11. Refueling and/or charging and recharging of batteries,
12. Operating limitations,
13. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate,
14. Surface conditions where the vehicle will be operated,
15. Composition of loads to be carried and load stability,
16. Load manipulation, stacking, and unshackling,
17. Pedestrian traffic in areas where the vehicle will be operated,
18. Narrow aisles and other restricted places where the vehicle will be operated,
19. Hazardous (classified) locations where the vehicle will be operated,
20. Ramps and other sloped surfaces that could affect the vehicle's stability,
21. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust,
22. Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation, and
23. The requirements of CFR 1910.178 (Powered Industrial Trucks).

Retraining is required when employee performs the equipment in an unsafe manner, there is an incident or a different vehicle type is put in service or changes in conditions.

CERTIFICATION

The trainer shall certify in writing that each operator has been trained and evaluated as required.

The certification shall include the name of the operator, the date of the training, the date of the evaluation and the identity of the person(s) performing the training and/or evaluation.

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Purpose

It is the intention of the Company to provide gas hazards training and detection equipment that meets or exceeds all federal standards. This program is associated with our Respiratory Protection Program.

Scope

This program applies to all Company projects and operations.

This program supplements the Company Respiratory Protection Program that is in place in accordance with 29CFR 1910.134.

Procedure

GAS HAZARDS EQUIPMENT

- Each employee shall use a portable gas monitor as required in all high gas or potentially high hazard areas.
- The gas monitor must be calibrated prior to use per manufacturer's recommendations and contain a current calibration sticker on the monitor providing the date of last calibration.
- Bump test are required to be completed at the beginning of each day the monitor is in use per the requesting Owner Client and manufacturer's guidelines to ensure the monitor is functioning correctly.

OWNER CLIENT CONTINGENCY PLANS AWARENESS

- Company shall insure all employees are aware of the Owner Client's contingency plan provisions including evacuation routes and alarms. Company employees shall participate in emergency evacuation drills and practice rescue procedures.

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Use, Maintenance and Care of Gas Monitors

- Only utilize monitors issued by either Company or made available by the Owner Client - no personal monitors are allowed.
- Have the gas monitor on the outside of all clothing.
- Check the calibration date prior to bump testing. If the calibration date is expired turn the unit in immediately and do not use.
- Bump test each shift prior to using the monitor.
- Monitors are sensitive equipment - avoid physical damage and immediately report any monitor that does not appear to be performing as expected.

Training

All affected employees will receive gas hazards awareness training before their initial assignment and annually thereafter. This shall be in conjunction with the Company Respiratory Protection training. Training shall address, as a minimum:

- Locations of alarm stations
- Gas Monitoring Equipment- Portable and Fixed Detection
- Gas Alarms
- Gas Hazards - Characteristics of gases, to include oxygen deficiency, oxygen or nitrogen enrichment, carbon monoxide and hydrogen sulfide
- Any plant or department specific gases of concern
- Signs and symptoms of overexposure
- Personnel Rescue Procedures
- Use and care of Self-Contained Breathing Apparatus (SCBA) - includes donning and emergency procedures (if applicable)
- Evacuation Procedures
- Staging Areas – Primary and Secondary

Gas Hazard Awareness training shall be documented and available for review.

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Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of Company facilities as related to the indicated general safety requirements that apply.

This program applies to all employees of the Company, temporary employees and any contractors working for the Company. When work is performed on a non-owned or operated site, the operator's program shall take precedence. However, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

MANAGEMENT COMMITMENT

At the Company we place a high value on the safety of our employees. We are committed to providing a safe workplace for all our employees and to support our commitment, this program is developed for accident and injury prevention. The implementation will involve all employees with management leadership support in identifying and eliminating hazards that may develop during our work process.

In our safety program's simplest interpretation, no task is too important that an employee may violate safety rules or take a risk of injury/illness to get a task done. Everyone is responsible for safety in this organization. Therefore, through this program and continuous evaluation, our ultimate goal and objective is to create a culture whereby our attitude will show a true reflection of collective safety efforts.

Management is committed to devoting the necessary resources for employee training as well as complete employee involvement through selective representative in safety committee. Job hazard analysis will be conducted on every job to identify, eliminate and reduce residual risk to barest minimum levels. However, we will make adequate plans for foreseeable emergencies.

Key Responsibilities

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EHS MANAGER

- The designated EHS Manager is responsible for developing and maintaining the General Safety Requirements program. These procedures are kept in the designated safety manager's office.

SITE MANAGER

- Responsible for the implementation and maintenance of the plan for their site and ensuring all assets are made available for compliance with the plan.

EMPLOYEES

- All shall be familiar with this procedure and the local workplace General Safety Requirements program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.
- Shall use the safeguards, safety appliances and personal protective equipment while following all safe work practices and procedures for the workplace.

Competency and Training

Workers shall be competent to operate equipment and perform job tasks. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision. Work that may endanger a worker must be completed by a worker who is competent to do the work or by a worker who is working under the direct supervision of a worker who is competent to do the work. All workers must be trained in procedures until they are competent. Company shall permit only trained or experienced workers to operate equipment and machinery.

Training must include: procedures to be taken in the event of a fire or other emergency, the location of first aid facilities, identification of prohibited or restricted areas, precautions to be taken for the protection of the worker from physical, chemical or biological hazards, any procedures, plans, policies and programs that Company is required to develop and any other matters that are necessary to ensure the health and safety of the worker while the worker is at work.

Company shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

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Inspections

The Company shall ensure that frequent and regular inspections of the workplace, jobsites, material, equipment and of work processes and procedures by a competent person be used to identify any risk to the safety or health of any person at the workplace.

The Company shall ensure that every dangerous occurrence is investigated as soon as is reasonably possible.

The Company must ensure that if a risk is identified, we will correct any unsafe condition as soon as is reasonably practicable and, in the interim, take immediate steps to protect the safety and health of any person who may be at risk.

General Facility Requirements

HOUSEKEEPING

Each work site shall be kept clean and free from material or equipment that could cause workers to slip or trip. A floor or other surface used by any worker shall be kept free of obstructions, hazards and accumulations of refuse, snow or ice.

Company requires that a worksite is sanitary and kept as clean as is reasonably practicable.

A reasonable supply of potable drinking water shall be kept readily accessible at a project for the use of workers.

SAFE EQUIPMENT MAINTENANCE

Company has a duty to ensure our work site maintenance, systems of work and working environments ensure, as far as is reasonably practicable, the health, safety and welfare at work of the our workers.

We must and shall ensure that all equipment is maintained at intervals that are sufficient to ensure the safe functioning of the equipment. All equipment is to be maintained, safe to perform adequate strength for its purpose and free from obvious defects. Damaged and faulty equipment reporting procedures must be in place.

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Where a defect is found in equipment, Groome Industrial Service Group will ensure that steps are taken immediately to protect the health and safety of any worker who may be at risk until the defect is corrected and the defect is corrected by a competent person as soon as is reasonably practicable.

Any machinery, tool, material, or equipment which is not in compliance with any applicable OSHA requirement is prohibited. The machine, tool, material or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

Any worker who knows or has reason to believe that equipment under the worker's control is not in a safe condition shall immediately report the condition of the equipment to Company and repair the equipment if the worker is authorized and competent to do so.

Company prohibits and will not require or permit compressed air to be directed towards a worker for the purpose of cleaning clothing or personal protective equipment used by that worker, or for any other purpose if the use of compressed air may cause dispersion into the air of contaminants that may be harmful to workers.

Whenever workers are present at a worksite, Company will provide lighting that is sufficient to protect the health and safety of workers and suitable for the work to be done at the worksite.

No worker is allowed to smoke in an enclosed place of employment, worksite or work-related area except in an area designated for smoking.

Impairment

No person shall enter or remain at any workplace of employment while the person's behavior or ability to work is affected by alcohol, intoxicating beverages, drugs or other substance so as to create a nuisance or if his or her abilities are impaired so as to endanger any person, or to create an undue risk to workers, endanger the person or anyone else.

Improper Conduct

All workers shall engage in proper activity or behavior. Improper behavior that might create or constitute a hazard to any person is not acceptable. Improper activity or behavior includes horseplay, scuffling, fighting, practical jokes, and unnecessary running or jumping.

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Industrial Hygiene

Where a worker is exposed to a potential hazard of injury to the eye due to contact with a biological or chemical substance, an eyewash fountain shall be provided.

A worker who may be exposed to a biological, chemical or physical agent that may endanger the worker's safety or health shall be trained to use the precautions and procedures to be followed in the handling, use and storage of the agent, in the proper use and care of required personal protective equipment, and in the proper use of emergency measures and procedures.

No food, drink or tobacco shall be taken into, left or consumed in any room, area or place where any substance that is poisonous by ingestion is exposed.

Protective clothing or other safety device that has been worn next to the skin shall be cleaned and disinfected prior to being worn by another worker.

Workers who handle or use corrosive, poisonous or other substances likely to endanger their health shall be provided with washing facilities with clean water, soap and individual towels.

Thermal Stress

A worker must not be exposed to levels that exceed those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. Clothing corrections must be applied in accordance with the heat stress and strain section of the ACGIH Standard.

If a worker is or may be exposed, Company must conduct a heat stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable to the local provincial or territorial agency and develop and implement a heat stress exposure control plan.

If a worker is or may be exposed, Company must implement engineering controls to reduce the exposure of workers

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to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. If the above action is not practicable, the employer must reduce the exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard by providing administrative controls including a work-rest cycle, or personal protective equipment if the equipment provides protection equally effective as administrative controls.

If a worker is or may be exposed, the employer must provide and maintain an adequate supply of cool potable water close to the work area for the use of a heat-exposed worker.

If a worker shows signs or reports symptoms of heat stress or strain, the worker must be removed from the hot environment and treated by an appropriate first aid attendant, if available, or by a physician.

If a worker is or may be exposed to the conditions specified below, Company, the employer, must conduct a cold stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable and develop and implement a cold exposure control plan.

- Thermal conditions that could cause cold stress or injury,
- Thermal conditions that could cause a worker's core body temperature to fall below 36°C (96.8°F), or
- Thermal conditions that are below the levels classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard.

If a worker is or may be exposed, Company must implement effective engineering controls to reduce the exposure hazard to levels above those classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard. If the above action is not practicable, Company must reduce the exposure hazard by providing effective administrative controls or personal protective equipment if the equipment provides protection equally effective as administrative controls.

A worker who is or may be exposed must wear adequate insulating clothing and personal protective equipment. If work takes place outdoors in snow or ice covered terrain where excessive ultraviolet light, glare or blowing ice crystals present a risk of injury to the eyes, workers must wear eye protection appropriate to the hazards.

If a worker exposed to cold shows signs or reports symptoms of cold stress or injury, the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician

Purpose

The purpose of this waste management strategy was developed to provide guidance and requirements necessary for efficient, effective and compliant waste management during construction and operations.

Scope

This procedure applies to all Company employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Procedure

The Company EHS Manager or other designated person in his or her absence is accountable for managing waste and disposition of wastes generated at the work site.

SITE-SPECIFIC WASTE MANAGEMENT PROCEDURES

Employees shall be informed as to waste management procedures specific to each job. COMPANY will inform affected employees of site-specific waste management procedures prior to their initial assignment and upon any changes in the site-specific waste management plan.

WASTE ESTIMATION

Production wastes, trash, scraps, and solid wastes, and non-hazardous wastes be taken into consideration prior to work commencing. The Company will estimate the waste products such as production wastes, trash, scraps, solid wastes, and non-hazardous wastes that we will generate so as to adequately prepare for the amount of waste removal containers and so logistics for removal can be properly assessed.

Each site will utilize the following for planning of dumpster scheduling and total non-hazardous dry waste material. These figures do not include neither recycling nor waste minimization efforts and reflect no use of an incinerator. Dumpster figures are based on a 40 yard container and can be modified if another size is used by changing the table below.

SAMPLE ONLY - SOLID WASTE						
	Number of Employees	10	25	35	50	100
<u>Total Estimated Square Feet of Waste</u> (@ 0.675 cu ft per person daily)						
	Daily	7	17	24	34	68
	Weekly	47	118	165	236	473
	Monthly (4.33 wks)	205	511	716	1,023	2,046
	Annual	2,455	6,138	8,593	12,276	24,551
<u>Total Estimated Weight of Waste</u> (@ 4lb per person daily)						
	Daily	40	100	140	200	400
	Weekly	280	700	980	1,400	2,800
	Monthly (4.33 wks)	1,212	3,031	4,243	6,062	12,124
	Annual	14,549	36,372	50,921	72,744	145,488
<u>Number of Total Dumpster Fills</u> 40 yard dumpster 7x8x22 = 1,232 square feet						
	Daily	0.0	0.0	0.0	0.0	0.1
	Weekly	0.0	0.1	0.1	0.2	0.4
	Monthly (4.33 wks)	0.2	0.4	0.6	0.8	1.7
	Annual	2.0	5.0	7.0	10.0	19.9

The Company must coordinate with the project site or owner to ensure proper disposal of wastes or scrap materials. The Company must ensure the owner client is aware of whether wastes and scrap materials will be taken off site by the Company or will be disposed of on the owner client's site.

HAZARDOUS WASTE SEGREGATION

- Do not mix waste streams
- Only place waste in the designated container, satellite accumulation area (SAA), recyclable accumulation area (RAA), universal waste accumulation area (UWAA) or designated dumpster.

RECYCLING

Waste should be recycled when possible. The Company should encourage proper segregation of waste materials to ensure opportunities for reuse or recycling. Employees must properly segregate wastes for the purpose of recycling when possible and practicable.

Proper Segregation of Waste Materials. The Company will provide for the proper segregation of waste materials to aid in reuse or recycling efforts when possible and practicable.

The collection of recycled material will reduce the total load on the environment. Bins of sufficient size must be lined with a plastic bag and clearly labeled for use. Posters from COMPANY will be posted throughout the work site to encourage recycling. Collection bins will also be placed in administrative areas will follow the following color guiding:

- Blue - Paper
- Green - Aluminum cans
- Yellow - Plastic

WASTE HANDLING MATRIX

Each work site will develop a Waste Handling Matrix (sample shown) that will:

- Address safe practices related to the immediate storage and handling of waste, scrap or leftover material.
- The handling, organization and storage of waste and scrap materials to minimize potential impact to the environment. Waste materials shall be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities receptacles must be covered to prevent dispersion of waste materials and to control the potential for runoff.

Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Aerosol Can Contents	Equipment Repair Shop	Puncturing of aerosol cans	Hazardous	SAA is self-contained in the equipment repair shop	Ship to assigned site for recycling or disposal	Read warnings before use of unit.
Aerosol Can Puncturing Unit Filter	Equipment Repair Shop	Filter Changes	Hazardous	Place in designated labeled container	Ship to assigned site for recycling or disposal	Change filter every 3 months

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Aerosol Cans	Various Locations	Painting, lubricants, cleaning	Non-Hazardous if aerosol can is punctured and drained	Place punctured aerosol can in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster from client.	See "Scrap Metal" for waste stream management
Ash	Smart Ash Unit	Incineration of acceptable waste	Non Hazardous	Dispose of Immediately	Place in the Burnable Waste Dumpster	Gloves Goggles
Automotive and Heavy Equipment Parts-Used	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in RAA	Returned to vendors for recycling	Starters, Alternators, Pumps, Transmissions
Batteries (Alkaline)	Various Locations	Battery Failures	Universal Waste	Place in the UWAA	"D" cell and below are acceptable in the Non-Burnable Waste Dumpster	Ship to designated site for recycling or disposal
Batteries (Lead Acid)	Equipment Repair Shop and Fab Shop	Battery Failures	Universal Waste	No storage allowed. Containment boxes are labeled and available in the shops.	Lead acid batteries are returned to the Vendor upon removal	Ship to designated site for recycling
Batteries (NiCad)	Various Locations	Battery Failures	Universal Waste	UWAA in the equipment repair shop.	Ship to assigned site for recycling or disposal	Cell phones, radios
Butane Torch Bottle	Various Locations	Mechanic activities	Excluded Hazardous if recycled	Place drained Butane Torch Bottles in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster	Prosolv Butane Bottle processor I
Cardboard/Office Paper	Parts Department & Offices	Shipping Boxes & Office Activities	Non-Hazardous	Place in RAA	Place on pallet in RAA and band for shipment to assigned site for recycling.	
Computers Discarded	Parts Department & Offices	Replacement	Non-Hazardous	Place in RAA	Ship to assigned site for recycling or disposal	

Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Diesel Filters-Used	Equipment Repair Shop and Fab Shop	Filter Changes	Non-Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Diesel Rags	Various Locations	Mechanic activities	Non-Hazardous	Oily waste rag in clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Drained Diesel	Equipment Repair and Fab Shop	Draining diesel fuel and filters	Non-Hazardous when burned as off-Spec fuel	Place in "used oil" tank in the equipment repair shop and fab shop.	Burned for energy recovery in clean burn multi-oil heating system.	
Empty Paint Cans	Various Locations	Painting activities	Non-Hazardous	No storage allowed	Ship to assigned site for recycling or disposal	Paint cans must be RCRA empty.
Fluorescent Light Ballast	Various Locations	Failure	Non-Hazardous unless they contain PCB's or DEHP	None	Place in Non-Burnable Dumpster	Ballast will say on the label if it contains PCB's
Fluorescent Light Bulbs	Shops, Office Areas	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA in the shop area	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Glass	Various Locations	Replacement	Non-Hazardous	None	Place in Non-Burnable Dumpster	Ensure glass containers are empty.
Glycol Rags	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Minimize use of absorbent rags
Glycol-Used	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	RAA - self-contained tank on recycling unit	Recycled in glycol recycling unit	Recycling unit stored in shop
Grinding Wheels	Equipment Repair Shop and Fab Shop	Grinding activities	Non-Hazardous	None	Place in Non-Burnable Dumpster	

Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Hoses & Belts	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in Non-Burnable Dumpster	Place in Non-Burnable Dumpster	Drain all fluids from hoses
Metal Shavings/Cuttings	Equipment Repair Shop and Fab Shop	Fabricating activities	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Ship to assigned site for recycling or disposal	Ensure there are no free flowing cutting fluids present before disposal.
Oil Filters-Used	Equipment Repair Shop and Fab Shop	Oil filter changes	Excluded Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Oil-Used	Equipment Repair Shop, Fab Shop, Service Trucks	Draining oil and filters	Excluded Hazardous if burned for energy recovery	Receiving sumps are located in the Equipment Repair Shop and Fab Shop	Burned for energy recovery in clean burn multi-oil heating system.	Keep lids on receiving sumps at all times. DO NOT PUT SOLVENTS INTO USED OIL
Oily Waste (rags, absorbents)	Various Locations	Mechanic activities, equipment drips and leaks	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Collected daily. See "Ash" for management and disposal
Paint Waste (rags, rollers, brushes, etc.)	Various Locations	Painting activities	Determine on per occurrence basis. Use MSDS or testing	If hazardous, store in the assigned area. If non-hazardous, no storage is required.	If hazardous, ship to assigned site for disposal. If non-hazardous, place in burnable waste dumpster.	Need to review MSDS, do analytical test, or use generator knowledge to make waste determinations.
Parts Cleaner Rags	Equipment Repair Shop	Cleaning parts	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Scrap Metal	Various Locations	Fabrication activities & house cleaning	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Ship to assigned site for recycling or disposal	Eye Protection Gloves

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Sodium Vapor/ Metal Halide Light Bulbs	Various Locations	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA.	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Tires	Various Locations	Replacement	Non-Hazardous	None	Ship to assigned site for recycling or disposal	
Toner Cartridges	Offices	Copiers, printers, fax machines	Non-Hazardous	Placed in original container in RAA	Ship to assigned site for recycling or disposal	Verify toner is expended before disposal.
Water Scrubber Filter & Absorbents	Equipment Repair Shop and Fab Shop	Filtering sump water in shops	Non-Hazardous	None	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Welding Rods	Various Locations	Welding activities	Excluded Hazardous	Placed in recycle metal dumpster or metal only RAA's	Ship to assigned site for recycling or disposal	See "Scrap Metal" for waste stream management
Wood Waste	Various Locations	Various activities and shipping pallets	Non-Hazardous	Store on the far back corner of the pad or in the dump truck box if available.	Ship to assigned site for recycling or disposal	Pallets are refurbished and recycled when possible

PROPER HANDLING AND STORAGE OF WASTE AND SCRAP MATERIALS GENERATED ON THE JOB REQUIREMENTS

Employees properly handle waste, scrap, and left-over materials properly. Affected employees will properly store and handle waste, scrap, and left-over materials so as to reduce the potential for a spill or negative impacts to the environment. Receptacles placed outdoors must be covered to prevent the dispersion of waste materials and to limit the potential for run-off.

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PPE

For each site waste management plan the Company shall determine a PPE matrix that includes gloves, hand protection, eye and face protection and/or other necessary PPE.

Training

Training be conducted for all employees who will be handling waste materials. All affected employees will be trained on the proper handling, storage, and disposal of wastes. There are two levels of waste training, non- hazardous waste and hazardous waste. Hazardous waste training must follow regulatory based criteria.

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Purpose

The purpose of this program is to provide established requirements for the safe operation of hand and power tools and other portable tools, including proper guarding. All hand and power tools shall be maintained in a safe condition.

This program applies to all Company employees who use hand and power tools.

Scope

This program is applicable to all Company employees while engaged in work at Company facilities and/or facilities operated by others.

Responsibilities

Any tool which is not in compliance with any applicable requirement of this plan is prohibited and shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

MANAGERS/SUPERVISORS

- Ensure that all employees using portable tools have been trained and fully understand the operations and maintenance procedures of such tools, including their proper use.
- Provide and train employees with all additional PPE that may be needed for the safe operation of portable tools.

EMPLOYEES

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- Shall ensure they have and properly use the correct tool for each task.
- Shall follow manufacturer's safety and operating instructions before using.

Requirements

GENERAL

All tools, regardless of ownership, shall be of an approved type and maintained in good condition.

- Tools are subject to inspection at any time.
- All employees have the authority and responsibility to condemn unsafe tools, regardless of ownership.

Unsafe tools shall be tagged with a "DO NOT USE OR OPERATE" tag to prevent their use.

Employees shall always use the proper tool for the job to be performed. Makeshift and substitute tools shall not be used.

Hammers with metal handles, screwdrivers with metal continuing through the handle, and metallic measuring tapes shall not be used on or near energized electrical circuit or equipment.

Tools shall not be thrown from place to place or from person to person; tools that must be raised or lowered from one elevation to another shall be placed in tool bags/buckets firmly attached to hand lines.

Tools shall never be placed unsecured on elevated places.

Impact tools such as chisels, punches, and drift pins that become mushroomed or cracked shall be dressed, repaired, or replaced before further use.

Chisels, drills, punches, ground rods, and pipes shall be held with suitable holders or tongs (not with the hands) while being struck by another employee.

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Shims shall not be used to make a wrench fit.

Wrenches with sprung or damaged jaws shall not be used.

Tools shall be used only for the purposes for which they have been approved.

Tools with sharp edges shall be stored and handled so that they will not cause injury or damage. They shall not be carried in pockets unless suitable protectors are in use to protect the edge.

Wooden handles that are loose, cracked, or splintered shall be replaced. The handle shall not be taped or lashed with wire.

Tools shall not be left lying around where they may cause a person to trip or stumble.

When working on or above open grating, a canvas or other suitable covering shall be used to cover the grating to prevent tools or parts from dropping to a lower level where others are present or the danger area shall be barricaded or guarded.

The insulation on hand tools shall not be depended upon to protect users from high voltage shock (except approved live line tools).

PORTABLE ELECTRIC TOOLS

The non-current carrying metal parts of portable electric tools such as drills, saws, and grinders shall be effectively grounded when connected to a power source unless:

- The tool is an approved double-insulated type, or
- The tool is connected to the power supply by means of an isolating transformer or other isolated power supply.

All powered tools shall be examined prior to use to ensure general serviceability and the presence of all applicable safety devices.

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Powered tools shall be used only within their design and shall be operated in accordance with manufacturer's instructions. The use of electric cords for hoisting or lowering tools shall not be permitted.

All tools shall be kept in good repair and shall be disconnected from the power source while repairs or adjustments are being made.

Electrical tools shall not be used where there is hazard of flammable vapors, gases, or dusts without a valid Hotwork Permit.

Ground fault circuit interrupters or use of an Assured Grounding Program shall be used with portable electric tools. This does not apply to equipment run off of portable or truck mounted generators at 5kw or less that are isolated from ground or to equipment ran directly off of secondaries.

PNEUMATIC TOOLS

Pneumatic tools shall never be pointed at another person.

Pneumatic power tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.

Safety clips or retainers shall be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled.

Compressed air shall not be used for cleaning purposes, except where reduced to less than 30 psi and then only with effective chip guarding and personal protective equipment.

Compressed air shall not be used to blow dust or dirt from clothing.

The manufacturers' stated safe operating pressure for hoses, pipes, valves, filters, and other fitting shall not be exceeded.

The use of hoses for hoisting or lowering tools shall not be permitted.

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Before making adjustments or changing air tools, unless equipped with quick-change connectors, the air shall be shut off at the air supply valve ahead of the hose. The hose shall be bled at the tool before breaking the connection.

Compressed air tools, while under pressure, must not be left unattended.

All connections to air tools shall be made secure before turning on air pressure. Air at the tool shall not be turned on until the tool is properly controlled.

All couplings and clamps on pressurized air hose shall be bridged (pinned) with suitable fasteners.

Hose and hose connections used for conducting compressed air to utilization equipment shall be designed for the pressure and service to which they are subjected.

Use only approved end-fitting clamps (screw type heater hose clamps are not acceptable). While blowing down hose, do not point it toward people.

Power tools are to be operated only by competent persons who have been trained in their proper use. Conductive hose should not be used near energized equipment.

Foot protection shall be worn while operating paving breakers, tampers, rotary drills, clay spades, and similar impactor-type tools or at other times when instructed by supervision.

All pneumatically driven nailers, staplers, and other similar equipment provided with automatic fastener feed, which operate at more than 100 psi pressure at the tool shall have a safety device on the muzzle to prevent the tool from ejecting fasteners, unless the muzzle is in contact with the work surface.

Airless spray guns of the type which atomize paints and fluids at high pressures (1,000 pounds or more per square inch) shall be equipped with automatic or visible manual safety devices which will prevent pulling of the trigger to prevent release of the paint or fluid until the safety device is manually released.

In lieu of the above, a diffuser nut (which will prevent high pressure), high velocity release (while the nozzle tip is removed), plus a nozzle tip guard (which will prevent the tip from coming into contact with the operator), or other equivalent protection, shall be provided.

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POWDER ACTUATED TOOLS (TOOLS ACTUATED BY AN EXPLOSIVE CHARGE)

Only those employees who have been certified in their use shall operate these tools. Explosive

charges shall be carried and transported in approved containers.

Operators and assistants using these tools shall be protected by means of eye, face, and hearing protection.

Tools shall be maintained in good condition and serviced regularly by qualified persons. The material upon which these tools are to be used shall be examined before work is started to determine its suitability and to eliminate the possibility of hazards to the operator and others.

Prior to use, the operator shall ensure that the protective shield is properly attached to the tool.

Before using a tool, the operator shall inspect it to determine to his satisfaction that it is clean, that all moving parts operate freely, all guards and safety devices are in place, and that the barrel is free from obstructions.

Before using tools, the operator shall read and become familiar with the manufacturer's operating guidelines and procedures.

When a tool develops a defect during use, the operator shall immediately cease to use it, until it is properly repaired in accordance with the manufacturer's specifications.

Tools shall not be loaded until just prior to the intended firing time, nor shall an unattended tool be left loaded. Empty tools are not to be pointed at any workmen.

In case of a misfire, the operator shall hold the tool in the operating position for at least 30 seconds. He shall then try to operate the tool a second time. He shall wait another 30 seconds, holding the tool in the operating position; then he shall proceed to remove the explosive load in strict accordance with the manufacturer's instructions.

A tool shall never be left unattended in a place where it would be available to unauthorized persons.

Fasteners shall not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface

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hardened steel, glass block, live rock, face brick, or hollow tile.

Driving into materials easily penetrated shall be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.

Tools shall not be used in an explosive or flammable atmosphere.

HYDRAULIC POWER TOOLS

The fluid used in hydraulic powered tools shall be fire-resistant fluids approved under Schedule 30 of the U.S. Bureau of Mines, Department of the Interior, and shall retain its operating characteristics at the most extreme temperatures to which it will be exposed.

The manufacturer's safe operating pressures for hoses, valves, pipes, filters, and other fittings shall not be exceeded.

All hydraulic tools, which are used on or around energized lines or equipment, shall use non-conducting hoses having adequate strength for the normal operating pressures.

HYDRAULIC JACKS

Loading and Marking

- The operator shall make sure that the jack used has a rating sufficient to lift and sustain the load.
- The rated load shall be legibly and permanently marked in a prominent location on the jack by casting, stamping, or other suitable means.

Operation and Maintenance

- In the absence of a firm foundation, the base of the jack shall be blocked. If there is a possibility of slippage of the cap, a block shall be placed in between the cap and the load.
- The operator shall watch the stop indicator, which shall be kept clean, in order to determine the limit of travel. The indicated limit shall not be overrun.
- After the load has been raised, it shall be cribbed, blocked, or otherwise secured at once.
- Hydraulic jacks exposed to freezing temperatures shall be supplied with adequate antifreeze liquid.
- All jacks shall be properly lubricated at regular intervals.

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Each jack shall be thoroughly inspected before each use. Jacks, which are in unsafe condition, shall be tagged accordingly, and shall not be used until repairs are made.

ABRASIVE BLAST CLEANING NOZZLES

The blast cleaning nozzles shall be equipped with an operating valve, which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.

FUEL POWERED TOOLS

All fuel-powered tools shall be stopped while being refueled, serviced, or maintained, and fuel shall be transported, handled, and stored in accordance with the Flammable and Combustible Liquids Program.

When fuel powered tools are used in enclosed spaces, the applicable requirements for concentrations of toxic gases and use of personal protective equipment, shall be adhered to.

GUARDING PORTABLE TOOLS

Guards shall be in place and operable at all times while the tool is in use. The guard may not be manipulated in such a way that will compromise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in ANSI B15.1.

Portable Circular Saws

- All portable, power-driven circular saws having a blade diameter greater than 2 in. shall be equipped with guards above and below the base plate or shoe.
- The upper guard shall cover the saw to the depth of the teeth, except for the minimum arc required to permit the base to be tilted for bevel cuts.
- The lower guard shall cover the saw to the depth of the teeth, except for the minimum arc required to allow proper retraction and contact with the work.
- When the tool is withdrawn from the work, the lower guard shall automatically and instantly return to covering position.
- All cracked saw blades shall be removed from service.

Switches and Controls

- All hand held powered tools, circular saws, drills, tappers, fastener drivers, horizontal or vertical angle grinders, etc., shall be with a constant pressure switch or control, and may not have a lock-on control.

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- All hand-held powered circular saws having a blade diameter greater than 2 inches, electric, hydraulic or pneumatic chain saws, and percussion tools without positive accessory holding means shall be equipped with a constant pressure switch or control that will shut off the power when the pressure is released. All hand-held gasoline powered chain saws shall be equipped with a constant pressure throttle control that will shut off the power to the saw chain when the pressure is released.
- The operating control on hand-held power tools shall be so located as to minimize the possibility of its accidental operation, if such accidental operation would constitute a hazard to employees.
- Grounding of portable electric powered tools shall meet the electrical requirements that can be found in the Electrical Safety Program. All electric power tools shall be equipped with a three-prong plug.

PORTABLE ABRASIVE WHEELS

Safety Guards Exceptions

- Wheels used for internal work while within the work being ground.
- Mounted wheels used in portable operations 2 inches and smaller in diameter.
- Types 16, 17, 18, 18R, and 19 cones, plugs, and threaded hole pot balls where the work offers protection.
- Guards shall be made of steel or other material with adequate strength.
- A safety guard shall cover the spindle end, nut and flange projections. The safety guard shall be mounted so as to maintain proper alignment with the wheel and the strength of the fastenings shall exceed the strength of the guard.
- Exception: Safety guards on all operations where the work provides a suitable measure of protection to the operator may be so constructed that the spindle end, nut and outer flange are exposed. Where the nature of the work is such as to entirely cover the side of the wheel, the side covers of the guard may be omitted.
- Exception: The spindle end, nut, and outer flange may be exposed on portable machines designed for, and used with, types 6, 11, 27, and 28 abrasive wheels, cutting off wheels, and tuck-pointing wheels.

Mounting and Inspection of Abrasive Wheels

- Immediately before mounting, all wheels shall be closely inspected and a ring test performed, to make sure they have not been damaged in transit, storage, or otherwise.
- Ring test – “tap” wheels about 45 degrees each side of the vertical centerline and about 1 or 2 inches from the periphery; then rotate the wheel 45 degrees and repeat the test; a sound and undamaged wheel will give a clear metallic tone - If cracked, there will be a dead sound and not a clear “ring.”
- The spindle speed of the machine shall be checked before mounting of the wheel to be certain that it does not exceed the maximum operating speed marked on the wheel.
- Grinding wheels shall fit freely on the spindle and remain free under all grinding conditions.
- A controlled clearance between the wheel hole and the machine spindle (or wheel sleeves or adaptors) is essential to avoid excessive pressure from mounting and spindle expansion.

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- The machine spindle shall be made to nominal (standard) size plus zero minus .002 inch, and the wheel hole shall be made suitably oversized to assure safety clearance under the conditions of operating heat and pressure.
- All contact surfaces of wheels, blotters, and flanges shall be flat and free of foreign matter.
- When a bushing is used in the wheel hole, it shall not exceed the width of the wheel and shall not contact the flanges.

PORTABLE GRINDERS

Special "revolving cup guards" which mount behind the wheel and turn with it shall be used. They shall be made of steel or other material with adequate strength and shall enclose the wheel sides upward from the back for one- third of the wheel thickness. It is necessary to maintain clearance between the wheel side and the guard. The clearance shall not exceed one-sixteenth inch.

Vertical portable grinders, also known as right angle grinders, shall have a maximum exposure angle of 180 degrees and the guard shall be located between the operator and the wheel during use. Adjustment of the guard shall ensure that pieces of an accidentally broken wheel will be deflected away from the operator.

Other Portable Grinders

The maximum angular exposure of the grinding wheel periphery and sides for safety guards used on other portable grinding machines shall not exceed 180 degrees and the top half of the wheel shall be enclosed at all times.

PERSONAL PROTECTIVE EQUIPMENT

Employees using hand and power tools exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists, vapors or gases shall be provided with the particular PPE necessary to protect them from the hazard.

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Purpose

The purpose of this program is to ensure that the hazards of all chemicals and substances are evaluated and the information concerning their hazards is communicated to employees, including emergency response organizations, state and federal agencies, other employers and contractors, as necessary. In 2012, OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012.

The Company is firmly committed to providing each of its employees a safe and healthy work environment. It is recognized that workers may use chemicals or substances that have potentially hazardous properties. When using these substances, workers must be aware of the identity, toxicity or hazardous properties of a chemical or substance, since an informed employee is more likely to be a safe employee. In accordance with 29 CFR 1910.1200, "The Hazard Communication Standard", the following written Hazard Communication Program has been established at the Company.

Scope

This program is applicable to all Company employees who may be exposed to hazardous chemicals. When work is performed on a non-owned or operated site, the operator's program shall take precedence. However, this document covers Company employees and contractors and shall be used on owned premises or when an operator's program doesn't exist or is less stringent.

Definitions

Chemical - any element, chemical compound, or mixture of elements and/or compounds.

Chemical Inventory List - a list of chemicals used at this facility, or by personnel that report to this facility.

Electronic Access – using electronic media (telephone, fax, internet, etc.) to obtain Safety Data Sheets or health information.

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Facility - an establishment at one geographical location containing one or more work areas.

Hazardous Chemical - any chemical that is a physical hazard, a health hazard, or has a Permissible Exposure Limit established for it.

Hazardous Substance - see Hazardous Chemical.

Hazard Communication Program Coordinator - the person who has overall responsibility at a facility for that facility's Hazard Communication Program.

Health Hazard - a substance for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic adverse health effects may occur in exposed employees.

IDLH - immediately dangerous to life and health.

Immediate Use - the chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Jobsite - an area remote from a Company facility where hazardous chemicals are stored or used and employees are present for the purpose of Company business.

(SDS) Safety Data Sheet - a written or printed document containing chemical hazard and safe handling information, prepared in accordance with the OSHA Occupational Safety & Health Standards, Section 1910.1200, paragraph (g).

(NFPA) National Fire Protection Association Labeling - a common industry labeling method developed by the National Fire Protection Association to identify the hazards associated with a particular chemical.

(PEL) Permissible Exposure Limit - the maximum eight-hour time weighted average of any airborne contaminant to which an employee may be exposed.

Readily Available - when an employee has access during the course of his/her normal work shift.

Substance - see Chemical.

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(TLV) Threshold Limit Value - the airborne concentration of a substance that represents conditions under which it is believed that nearly all normal workers may be repeatedly exposed day after day without adverse effects.

Work Area - a room or defined space in a facility where hazardous chemicals are stored or used and where one or more employees are present.

Workplace - see Facility.

Workplace Chemical List - see Facility Chemical List.

Responsibilities

A written hazard communication program shall be developed, implemented and maintained at each Company workplace. The program shall describe how labels, other forms of warning and safety data sheets shall be communicated to employees.

The EHS Specialist/Manager is responsible for developing and implementing the Hazard Communications Program. EHS Specialist/Manager are responsible for maintaining Safety Data Sheets and the Chemical Inventory List for their locations. The EHS Specialist/Manager reviews the SDS files and Chemical Inventory List at each location at least annually to ensure that they are complete and up to date.

Employees are responsible for following the requirements in the Hazard Communication Program, to use proper personal protective equipment, to report containers without labels immediately and to not deface any label.

Any employee who transfers any material from one container to another is responsible for labeling the new container with all required information.

All employees are responsible for learning the requirements of this section and for applying them to their daily work routine.

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Requirements

INTRODUCTION

This Hazard Communication Program was prepared for use by the Company to explain how Company meets the requirements of the federal Occupational Safety and Health Administration's Hazard Communication Standard (29 CFR 1910.1200). It spells out how Company will inventory chemicals stored and used, obtain and use safety data sheets, maintain labels on chemical substances, and train employees about the hazards of chemicals they are likely to encounter on the job.

Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- In addition to the program, other information required as part of our hazard communication effort is available to workers upon request.
- Asking to see this information is an employee's right.
- Using this information is part of our shared commitment to a safe, healthy workplace.

LIST OF HAZARDOUS CHEMICALS

The Company maintains a listing of all known hazardous chemicals known to be present, used at, or by this facility by using the identity that is referenced on the safety data sheet (SDS). This identity is often a common name, such as the product or trade name (e.g., Lime-A-Way).

The Chemical Inventory List is updated as necessary and at least annually by the Hazard Communication Program Coordinator or their designee.

The facility Chemical Inventory List must be available for review upon request.

SAFETY DATA SHEETS

Chemical manufacturers are responsible for developing SDS's. The Company shall have an SDS for each chemical used with the exception of consumer products.

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Safety Data Sheets, for chemicals used in this facility or by personnel reporting to this facility, shall be maintained, readily accessible in each work area and be made available, upon request, to employees, their designated representatives and regulatory officials in accordance with the requirements of 29 CFR 1910.1020(e).

Safety Data Sheets are filed alphabetically, by material classification, both online and/or in the SDS Book. A Chemical Inventory List is provided in the front of the SDS Book, listing all SDS' contained therein. This inventory serves as the index of the SDS Book. The SDS Book shall be displayed in a prominent location in the work area where it is accessible to all employees.

SDS Track – Online SDS Portal

Groome/Expro utilizes USI's "SDS Track®" online portal system to provide ease and accessibility of SDSs for all employees. Groome/Expro employees have access to SDS Track upon being hired and by going to:

<https://portal.succeedms.com>

Upon accessing this website, they enter the following: Company

ID: 304208

Username: (the first letter of their first name followed by their last name – e.g. jsmith. If their last name has less than five letters, a "1" is added to the end of their username – e.g. treid1).

Password: Groome22!

Appendix A of this procedure provides a poster that is to be posted in all common work areas at all Groome/Expro locations.

A copy of an SDS request form is located in the first section of the SDS Book. An employee may use a copy of this form to request an SDS or he/she may ask the Safety Manager/EHS Specialist/Manager for one. In either case the requested SDS must be given to the employee within 24 hours.

SDS's must be obtained for each required chemical from the chemical manufacturer, supplier or vendor. The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Safety Data Sheet in a timely fashion is prohibited.

The Safety Data Sheet must be kept in the SDS library for as long as the chemical is used by the facility. Electronic

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access (telephone, fax, internet, etc.) may be used to acquire and maintain SDS libraries and archives.

The EHS Specialist/Manager/Safety Manager is responsible for seeing that the Chemical Inventory List inventory is maintained, is current and is complete. He will review the inventory and the SDS Book at

least annually. When a hazardous material has been permanently removed from the work place, its SDS is to be removed from the SDS Book and the Chemical Inventory List. A file copy is to be maintained in a "dead file".

SDS's for hazardous materials to which Company employees have been exposed must be maintained after the employee leaves the employment of Company. Before any non-routine task is performed, employees will be advised of special precautions and the hazards associated with chemicals contained in unlabeled pipes in their work areas, if present. In the unlikely event that such tasks are required, the EHS Specialist/Manager/Safety Manager will provide SDS's for involved chemicals. Employees have the right to request SDS's on any chemical and it must be provided without any issues.

LABELS, LABELING AND WARNINGS:

The EHS Specialist/Manager/Safety Manager will ensure that all hazardous chemicals used or stored in the facility are properly labeled.

- Damaged labels or labels with incomplete information shall be reported immediately.
- Damaged labels on incoming containers of chemicals shall not be removed.
- New labels shall be provided as needed so that all containers are properly labeled.
- Only containers into which an employee transfers a chemical for their own immediate use will not require labeling.
- Employees who are unsure of the contents of any container, vessel or piping must contact their supervisor for information regarding the substance including:
 - o The name of the substance
 - o The hazards related to the substance
 - o The safety precautions required for working with the substance.

Labels, tags or markings on containers shall list as a minimum:

- Words, pictures, symbols or combinations thereof may be used.
- The trade name of the product as listed on the Safety Data Sheet.
- Appropriate hazard warnings to help employees protect themselves from the hazards of the substance.
- Labels provided by chemical manufacturers, distributors, and importers must also list the name and address of the manufacturer, importer, or vendor responsible for the chemical, and from whom more information about the chemical can be obtained.

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- Labels shall be legible, in English at a minimum, and prominently displayed on the container, or readily available in the work area throughout each work shift. However, for non-English speaking employees, information shall be presented in their language as well.
- Company or employees shall not remove or deface labels on incoming containers of hazardous chemicals.

All containers must be labeled. When an employee transfers the contents of one container to another, he must label the new container with all required information. This information can be obtained from the labeling of the original container or from the material's SDS. Any container of a potentially hazardous material that will not be emptied during one shift must be labeled, without exception.

Personnel in the Shipping and Receiving Departments are responsible for proper labeling of all containers shipped by the Company and for the inspection of all incoming materials to ensure correct labeling. Chemicals received from vendors that are not properly labeled must be rejected.

NFPA Standard 704 labels shall be the preferred hazard identification method used in Company facilities and on material containers used on client sites. All employees, clients, subcontractors and visitors who may come in contact with a Company hazardous substance must be briefed to ensure understanding of the NFPA 704 labeling system.

TRAINING

Company shall provide employees and new hires at their initial assignment effective information and training on hazardous chemicals in their work area.

Additional training will be provided whenever a new chemical hazard is introduced into the work area. To reinforce the importance of handling chemicals properly when performing new or non-routine tasks, Supervision will conduct supplementary training as needed.

Formal training will be conducted by facility employees or individuals who are knowledgeable in the Hazard Communication program.

The EHS Specialist/Manager shall ensure records of employee training are maintained.

When an outside contractor, such as a pest control worker or a carpenter enters a Company site to perform a service for the company, he must first present SDS's for any and all hazardous chemicals he will use. These SDS's will be treated as above with the same training requirements. The EHS Specialist/Manager will be responsible for contacting each contractor before work is started to gather and disseminate any information concerning chemical hazards the contractor is bringing into the work place.

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The Hazard Communication Program documented training shall, as a minimum, include:

- Requirements, details and rights of the employee as contained in the Hazard Communication regulation.
- Operations and work areas where hazardous chemicals are present.
- Location of the written Hazard Communication Program, SDS's and the Chemical Inventory List.
- How to access SDS's or SDS information.
- How to read and explain labels and Safety Data Sheets for pertinent hazard information and how employees can obtain and use the appropriate hazard information.
- Methods and observations that may be used to detect the presence or release of hazardous chemicals by use of monitoring devices, visual appearance or odor.
- The physical & health hazards of chemicals in the work area.
- Protection measures to be utilized to prevent exposure.
- Appropriate work practices.
- Emergency procedures.
- Proper PPE to be used.

MULTI-EMPLOYER JOB SITES/MULTI-WORK SITE

Multi-Work Sites

Where employees must travel between work places during a work shift, the written HAZCOM Program shall be kept at a primary job site. If there is no primary job site, then the program shall be sent with employees.

The program shall be made available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director in accordance with requirements of 29 CFR 1910.1020(e).

Multi-Employer Job Sites

A pre-job briefing shall be conducted with the contractor, prior to the initiation of work, on the site.

- During this pre-job briefing, contractors shall notify the Company and present current copies of Safety Data Sheets and label information for every hazardous substance brought on-site.
- The Company shall notify and provide SDS's and label information for all hazardous materials the contractor may encounter on the job.
- The facility's labeling system and any precautionary measures to be taken by contractor during normal conditions and emergencies shall be addressed.

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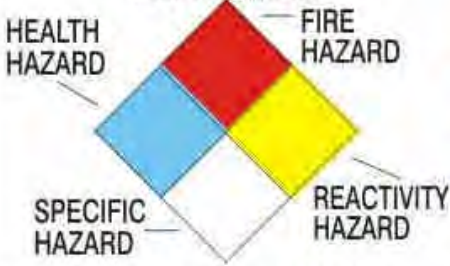
- By providing such information to other employers, Company does not assume any obligations that other employers have for the safety of their employees.
- In this regard, other employers working on Company property or for Company on client's property remain fully responsible for developing and implementing their own compliant hazard communication programs.

HAZARD WARNINGS / NFPA 704

The NFPA 704 Diamond is a means of disseminating hazard warning and information for a material. The diamond is divided into four sections. Each of the first three-colored sections has a number in it associated with a particular hazard. The higher the number is, the more hazardous a material is for that characteristic. The fourth section includes special hazard information. The four sections and an explanation of the numbers in them are provided below:

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NFPA DIAMOND



HEALTH HAZARD 4-Deadly 3-Extreme danger 2-Hazardous 1-Slightly hazardous 0-Normal material	FIRE HAZARD <i>Flash Points</i> 4-Below 73° F 3-Below 100° F 2-Below 200° F 1-Above 200° F 0-Will not burn	REACTIVITY HAZARD 4-May detonate 3-Shock and heat may detonate 2-Violent chemical change 1-Unstable if heated 0-Stable	SPECIFIC HAZARD <table border="0"> <tr><td>Oxidizer</td><td>OXY</td></tr> <tr><td>Acid</td><td>ACID</td></tr> <tr><td>Alkali</td><td>ALK</td></tr> <tr><td>Corrosive</td><td>COR</td></tr> <tr><td>Use NO WATER</td><td>W</td></tr> <tr><td>Radiation Hazard</td><td></td></tr> </table>	Oxidizer	OXY	Acid	ACID	Alkali	ALK	Corrosive	COR	Use NO WATER	W	Radiation Hazard	
Oxidizer	OXY														
Acid	ACID														
Alkali	ALK														
Corrosive	COR														
Use NO WATER	W														
Radiation Hazard															

COLOR BAR



RATING EXPLANATION GUIDE

HEALTH		FLAMMABLE		REACTIVE	
Recommended Protection		Susceptibility to Burning		Susceptibility to Energy Release	
4	Special full protective suit and breathing apparatus must be worn	4	Very flammable	4	May detonate under normal conditions
3	Full protective suit and breathing apparatus should be worn	3	Ignites under normal temperature conditions	3	May detonate with shock or heat
2	Breathing apparatus with full face mask should be worn	2	Ignites with moderate heating	2	Violent chemical change but does not detonate
1	Breathing apparatus may be worn	1	Ignites when preheated	1	Not stable if heated use precautions
0	No precautions necessary	0	Will not ignite	0	Normally stable

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Purpose

- To provide guidelines for identifying, assessing and controlling workplace hazards;
- To ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace;
- To identify the jobs/tasks which require risk assessment.

Key Responsibilities

As specified within this program. The Company must assess a work site and identify existing or potential hazards before work begins at the work site or prior to the construction of a new work site.

Hazard and Risk Identification

The hazard identification process should be used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable.

The Safety Manager shall conduct a baseline worksite hazard assessment which is a formal process in place to identify the various tasks that are to be performed and the accompanying identified potential hazards. The results are included in a report of the hazard assessment and the methods used to control or eliminate the hazards identified. The hazard assessment report must be signed and dated.

Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work;
- Legal and other requirements;
- Previous incidents and non-conformances;
- Sources of energy, contaminants and other environmental conditions that can cause injury;
- Walk through of work environment;

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Hazards identifications (as examples) are to include:

- Working Alone
- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Musculoskeletal Disorders
- Bloodborne Pathogens
- Confined Spaces
- Driving
- General Safety Precautions
- And any other established policy or procedure by COMPANY
- Any other site specific work scope

Policies are in place to identify potential hazards by the use of JSA, JHA, FRSF, work permits, inspections by department, site or company audits, toolbox meetings, incident notices, safety observations and incident investigations.

All identified hazards are then assessed for risk and risk controls are assigned within the worksite hazard assessment for that specific hazard.

At existing locations, employees and/or subcontractors are actively involved in the identification of hazards. All employees and subcontractors affected by hazards identified in the hazard assessment process are informed of the hazards and the methods used to control or eliminate the hazard. Worker names and participation in the process shall be documented either on the written hazard assessment reports or in tool box meeting forms. Workers will be trained in the hazard identification process including the use and care of proper PPE, how to complete FRSF, JHAs, etc.

Unsafe hazards must be reported immediately and addressed by the supervisor. The supervisor discusses the worksite hazard assessment with employees at the respective work location during the employee's documented orientation.

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REVIEW OF HAZARD ASSESSMENT

Existing worksite hazard identifications are formally reviewed annually or repeated at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions and specifically updated when new tasks are to be performed that have not been risk assessed, when a work process or operation changes, before the construction of a new site or when significant additions or alterations to a job site are made.

The respective supervisor or project manager advises the Safety Manager when additional hazards are introduced into the work place in order to revise planning and assessment needs.

Risk Assessment

Each identified hazard is assessed, classified and ranked on severity of potential consequences of effecting injury to people, damage to assets, the environment or reputation of the Company. The probability of risk exposure is then considered and applied.

Following risk assessment steps, each risk assessed becomes classified as low, medium or high in accordance with the Company Risk Assessment Matrix shown below. The risk level of the hazard is recorded with the associated work task within the site specific HSE plan for the job site.

COMPANY RISK ASSESSMENT MATRIX

CONSEQUENCE					PROBABILITY				
Severity	People	Assets	Environment	Reputation	A	B	C	D	E
					Improbable	Remote	Occasional	Probable	Frequently
0	No health effect	No damage	No effect	No impact					
1	Slight health effect	Slight damage	Slight effect	Slight impact					
2	Minor health effect	Minor damage	Minor effect	Limited impact					
3	Major health effect	Localized damage	Localized effect	Considerable impact					
4	Single fatality	Major damage	Major effect	National impact					
5	Multiple fatalities	Extensive damage	Massive effect	Global impact					

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Key	Manage for continuous improvement (Low)	Incorporate risk reduction measures (Medium)	Intolerable (High)

Risk Controls

Risk assessed hazards are compiled with and addressed and mitigated through dedicated assignment, appropriate documentation of completion, and implemented control methods including engineering or administrative controls and PPE required into the worksite hazard assessment of the site specific EHS plan. No work will begin before the worksite assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.

If the hazard cannot be eliminated, then it shall be controlled by Engineering, Administrative and/or PPE controls. Engineering controls are incorporated into the process itself, sometimes as part of the equipment. Substitution could be one engineered method to follow. Administrative controls are used to minimize the exposure to a hazard by worker training and worker rotation. If the engineering or administrative controls do not achieve this, then the employer must ensure the appropriate PPE is used by workers affected by the hazard. The Company may use a combination of engineering, administrative and PPE controls to achieve a greater level of worker safety.

EMERGENCY CONTROL OF HAZARDS

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. The Company will make every possible effort to control the hazard while the condition is being corrected or under the supervision of client emergency response personnel in every emergency.

CERTIFICATION OF HAZARD ASSESSMENT

The Safety Manager completes and signs the certification of hazard assessment for the worksite hazard assessment (also see PPE Program) and includes it within the site specific EHS plan. Hazard assessments are reviewed annually and updated when new tasks are to be performed that have not been risk assessed.

JOB SAFETY ANALYSIS (JSA)

The Company Supervisor is responsible for leading the "Field Risk Assessment (JSA)" process at the start of each shift. This risk assessment is to be a collaborative one with the work crew to identify the hazards and mitigating controls related to the work task. The "Field Risk Assessment (JSA)" form is completed electronically on a mobile device via the Go Canvas platform. It is to be completed at the work location at the time the work is to begin and kept open throughout the work task.

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to make modifications as the work conditions change. Once the work task and/or shift is complete, the Company Supervisor must submit the form via Go Canvas. The EHS Specialist/Manager will maintain records of completed forms via Go Canvas and will review them periodically for completion.

SITE SPECIFIC HSE PLAN (SSHP)

Each work location has a site specific EHS plan . Each employee reporting to a location shall receive a documented orientation from a Company supervisor that includes the SSHP for that site. The SSHP contains the Company Health and Safety Policy, site specific safety requirements as well as a PPE matrix and a signed site specific worksite hazard assessment for that location, which the Company has a responsibility to provide.

Review Process

The hazard assessment program will be reviewed to ensure no new hazards derived from the corrective measures. The review shall include a management of change consideration as well.

The safety committee shall be involved in the review process as well.

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Purpose

This requirement covers hazardous waste operations procedures, to include responsibilities, monitoring for exposure, decontamination and training for personnel working with hazardous waste.

Scope

This section applies to all employees and independent contractors employed by and/or contracted to the Company when responding to hazardous waste operations.

Requirements

HAZARDOUS WASTE OPERATIONS PROGRAM

The program shall be designed to identify, evaluate, control safety and health hazards and provide for emergency response.

The program should detail a specific chain of command, address tasks and objectives of the operations, and address site specific procedures.

The hazardous waste operations plan address procedures to be followed in the event of an emergency include:

- Pre-emergency planning
- Coordination with outside parties
- Personnel roles and responsibilities
- Lines of authority
- Communications
- Safe evacuation distances
- Places of refuge
- Accounting for personnel
- Training and drills
- After action analysis

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ENGINEERING CONTROLS

Engineering controls are used to reduce exposure to hazardous substances. Engineering controls and work practices shall be instituted to reduce and maintain employee exposure to or below the permissible exposure limits for substances regulated by 29 CFR Part 1910, except to the extent that such controls and practices are not feasible. Engineering controls which may be feasible include the use of pressurized cabs or control booths on equipment, and/or the use of remotely operated material handling equipment. Work practices which may be feasible are removing all non-essential employees from potential exposure during opening of drums, wetting down dusty operations and locating employees upwind of possible hazards.

Procedure

Use of the following safety and control procedures will be used by those in charge at the scene to ensure the safety and health of personnel at spill locations.

PERSON DISCOVERING THE SPILL

- Survey and Secure the Area. Evaluate the seriousness of the situation in regard to protecting personnel and the public. Do not approach the spill if you can smell hydrocarbons or potential chemical sources.
- Notify your supervisor as soon as possible. Remember, any device you use to call in spill notice may not be intrinsically safe. Place your call from a safe distance.
- If the situation requires, stay at the scene and control access at a safe distance from the spill until the initial response team arrives. The spill area will become subject to regulatory controls with restricted access

INITIAL SPILL CONTROL ACTIONS

- Initial spill control actions designed to halt the spread of a spill, direct its movements, or minimize the area affected by the spill shall not be initiated in the immediate spill area until all of the following occur:
 - o A complete site safety analysis
 - o Air monitoring shall be used to identify and qualify airborne levels of hazardous substances. The monitoring will address initial entry, periodic monitoring, possible IDLH conditions and wherever exposure may be a possibility.

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- o Gas detector readings are 10% or less of the lower explosive limit (LEL). If the readings are above 10% of the LEL, spill control actions shall be terminated in the immediate area and moved to an area where LEL conditions are less than 10%.

POTENTIAL EXPOSURE TO HAZARDOUS SUBSTANCES IS MONITORED

- Monitoring shall be performed where there may be a question of employee exposure to hazardous concentrations of hazardous substances in order to assure proper selection of engineering controls, work practices and personal protective equipment so that employees are not exposed to levels which exceed permissible exposure limits, or published exposure levels if there are no permissible exposure limits, for hazardous substances. COMPANY must do air monitoring when first entering an area with potentially hazardous materials and also do monitoring periodically to see if the situation has changed while hazardous material work takes place.
- Air monitoring should be used to identify and quantify airborne levels of hazardous substances. The monitoring should address initial entry, periodic monitoring, possible IDLH conditions and wherever exposure may be a possibility.
- Combustible gas detectors (LEL meters) must have current calibrations and be function tested prior to an approach to a spill site.
- At a minimum, the oxygen, LEL and permissible exposure level (PEL) must be evaluated throughout the regulated area at as many points around the spill perimeter as possible. These levels shall be monitored periodically throughout the work shift to detect changes in airborne hazards that may result from work activities, changing weather conditions, etc.
- Approach to the incident site.
 - o Perform a function test and check the zero reading on the gas detector.
 - o Don the respirator.
 - o Observe the readings on the gas detectors as you approach the spill site.
 - o Continue until one of the following conditions occurs.
- You can see all that you need to observe, or
- The gas detector reads 10% or more of the LEL, or
- Liquid oil or gas condensates are encountered.
- CAUTION Care must be taken to keep the gas detectors warm and prevent rough handling.
- NOTE If any of these conditions are exceeded, do not proceed any closer to the spill perimeter.
- After the initial observations are performed, the site conditions shall be reported to the Incident Commander.
- Mark or flag an exclusion area (hot zone) around the spill site to further control access.

DECONTAMINATION PROCEDURES

- All employees leaving a contaminated area shall be appropriately decontaminated.

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- All employees leaving a contaminated area shall be appropriately decontaminated. All contaminated clothing and equipment leaving a contaminated area shall be appropriately disposed of or decontaminated. Decontamination procedures shall be monitored by the site safety and health supervisor to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies. The Company must make sure employees who work with hazardous materials are decontaminated when leaving the hot zone. The purpose of a decontamination procedure is to stop the spread of hazardous material from the hot zone into the surrounding areas.
- Decontamination Area Location - Decontamination shall be performed in geographical areas that will minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment.
- Personal protective equipment is decontaminated. PPE and equipment shall be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness. Employees whose non-impermeable clothing becomes wetted with hazardous substances shall immediately remove the clothing. Unauthorized employees shall not remove protective clothing or equipment from change rooms.

SAFETY PROCEDURES FOR EXCLUSION AREAS

- Personnel shall be given a safety briefing on the specific hazards and hazard control procedures prior to entering the spill site.
- To minimize personnel exposure and reduce potential ignition sources, where possible, all initial approaches to the suspected spill site will be from the upwind direction.
- Personnel shall not approach the site or attempt gas testing without wearing appropriate respiratory protection.

PERSONAL PROTECTIVE EQUIPMENT (PPE) AND CHEMICAL PROTECTIVE CLOTHING

- Respiratory Protection - During spill response operations when gas detectors read 10% or more of the LEL, trained gas testing personnel shall measure PEL levels to determine appropriate respiratory protection levels.
- Skin Protection - The following PPE is recommended to minimize dermal exposure to chemicals:
 - o Hands: neoprene, nitrile or butyl rubber gloves
 - o Feet: neoprene, nitrile or butyl rubber boots
 - o Body: coated tyvek or PVC rain suits (as necessary)
 - o Eye Protection - At a minimum, safety glasses must be worn. If a splash hazard to the eyes is present, chemical goggles or a face shield with chemical goggles shall be used. Eye protection is not required if a full-face respirator is worn.
 - o NOTE: Either one-piece or two-piece chemical (magnum 445) suits can be used. Gloves and boots can be taped to the arms and legs of the suits as needed. The flaps of a two-piece suit can be

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taped as well. Heavy duty duct tape is recommended

OTHER CONSIDERATIONS

- The purpose of personal protective clothing and equipment is to shield or isolate individuals from the chemical, physical, and biological hazards associated with handling crude oil. No single combination of protective equipment and clothing is capable of protecting against all hazards.
- Consider the following:
 - o The use of PPE can itself create significant worker hazards, such as heat stress, physical and psychological stress, and impaired vision, mobility, and communication.
 - o Equipment and clothing that provide an adequate level of protection shall be used.
 - o Overprotection, as well as under protection, should be avoided where possible.

GENERAL SAFETY/PHYSICAL HAZARDS

During training drills, spill responses, and remediation operations, the physical working environment of personnel shall be continually evaluated. Exposure to either hot or cold weather conditions along with long working hours, could adversely affect both the psychological and physiological condition of those involved. Continued exposure may result in physical discomfort, loss of efficiency, and a higher susceptibility to accidents and injuries.

Personnel must be constantly alert to signs of distress and eliminate or protect against accident causes. There is a need to constantly review methods and procedures for routine work and emergency response situations so that all personnel may function as safely and effectively as possible.

Supervision shall keep the following procedures and safety precautions in mind when working with petroleum and petroleum products and as decisions are made in how the work is to be conducted:

- A job shall be planned, and all personnel briefed as to the procedures to be followed and the responsibilities of each person.
- Supervision shall remain on the job at all times or designate a qualified person to take their place if called away.
- When responding to hydrocarbon spills or gas leaks, the hazardous area shall be defined. No personnel or equipment shall be permitted in the area of a spill until the hazards associated with the contaminated area have been clearly defined by a qualified person.
- Before moving to the job site, supervision should check tools and safety equipment (including personal protective equipment), to ensure everything is safe, usable, and all required tools and safety equipment are available.

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- Vehicles, heavy equipment, hand tools, and power equipment shall not be moved into a spill area until adequate precautions have been taken. When power equipment is moved into a spill area to expedite repairs, it should be removed from the area as soon as work with it is completed. Personnel who are not required should be kept out of the work area.
- Use of matches, lighters, and smoking materials shall be in a place designated as safe by supervision.
- Upon completion of equipment repairs, necessary operating checks should be made before placing the unit in service.
- A senior official or commander will take charge of an emergency situation. The senior official at an emergency response is the most senior official on the site who has the responsibility for controlling operations at the site.
- Medical surveillance is provided to responders potentially exposed to hazardous substances. The program must be provided at no cost to the employees. All employees who are or may be exposed to hazardous substances or health hazards at or above the established permissible exposure limit, above the published exposure levels for these substances, without regard to the use of respirators, for 30 days or more a year must be provided medical surveillance.

Training

Employees are provided training on provided training on Hazardous Waste Operations.

All employees working on site (exposed to hazardous substances, health hazards or safety hazards) and supervisors/management shall receive training before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards, and they shall receive review training. Employees who work on-site with exposure to hazardous substances must be trained before they are allowed to do work in hazardous waste operations.

Initial Emergency Response Training

Who Needs Emergency Response Training?

- Support Personnel: This designation applies to Company or contractor personnel who are supporting in the operation of equipment or material (such as general laborers, equipment operators, mechanized earth moving operators or crane and hoisting equipment operators), and who are needed temporarily to perform immediate emergency support work that cannot reasonably be done in a timely manner by COMPANY employee responders. Support personnel who will be or may

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be exposed to the hazards at an emergency response scene shall be trained on the use of personal protective equipment and also will cover work practices which minimize hazardous risks and safe use of engineering controls & equipment.

- First Responder Awareness Level: Company personnel who are likely to witness or discover a hazardous substance release and have been trained to initiate an emergency response sequence by notifying COMPANY facility operations personnel of the release. Personnel at this level must receive initial training or have had enough experience to objectively demonstrate competency. Annual refresher training or demonstration of competency is also required. First Responder Awareness Level employees shall have sufficient training or experience to objectively demonstrate competency in the following areas:
 - o An understanding of what hazardous substances are, and the risks associated with them in an incident.
 - o An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
 - o The ability to recognize the presence of hazardous substances in an emergency.
 - o The ability to identify the hazardous substances if possible.
 - o An understanding of the role of the first responder awareness individual in the client's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook.
 - o The ability to realize the need for additional resources, and to make appropriate notifications.
- First Responder Awareness Operations Level: Awareness training is provided to all first responders at the operations level. Individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release.
- Hazardous Materials Technicians: Company personnel, who are identified in contingency plans as responders to releases or potential releases of hazardous materials for the purpose of stopping the release, shall be trained to this level. Technicians have the knowledge of how to implement emergency response plans, know the classification, identification and verification of known or unknown substances, functions with an assigned role in the incident command system, how to select and use proper PPE, perform advanced containment and understands decontamination and toxicology. All personnel at this level must receive at least 24 hours of training equal to first responder operations level. Annual refresher training or demonstration of competency is required. Certification is required.
- Hazardous Materials Specialists: All Company and personnel working as field Safety Specialist shall

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be trained to this level. Material Specialists receive at least 24 hours of training the technical level and have the ability to develop a site and safety control plan. Annual refresher training or demonstration of competency is also required. Certification is required.

- On-Scene Incident Commander: The Incident Commander must have at least 24 hours of training equal to the first responder operations level and know how to implement the program and system, PPE requirements, hazard and risk assessment, state and federal regulations and all elements of decontamination. Certification is required.

Post-Emergency Response Training

For chemical spills, a minimum of four hours of training for post-emergency response workers who have job duties and responsibilities with a low magnitude of risk shall occur.

Refresher Training

- Employees who are trained in accordance with the plan shall receive annual refresher training. A record of methods used must be kept.
- Participation in drills, completion of approved response training modules, and on-the-job training based on the duties and functions each employee is expected to perform during an emergency response may be substituted for, or used in conjunction with, formal classroom training to demonstrate competency. If demonstrated competency is used in lieu of or in conjunction with classroom training, then Company must keep a record of the methodology used to demonstrate competency.

Trainers Qualifications

- Emergency Response trainers must be competent/qualified. They shall have the training and/or academic credentials and instructional experience to demonstrate competency.

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Purpose

The purpose of this program is to provide a process to minimize employee-hearing loss caused by excessive occupational exposure to noise.

Scope

This program is applicable to all employees who may be exposed to noise in excess of 85 decibels (decibels). When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Action Level - An 8-hour time-weighted average of 85 decibels measured on the A-scale, slow response, or equivalently, a dose of fifty percent.

Attenuate - To lessen the intensity.

Audiogram - A chart, graph, or table resulting from an audiometric test showing an individual's hearing threshold levels as a function of frequency.

Audiologist - A professional, specializing in the study and rehabilitation of hearing, who is certified by the American Speech-Language-Hearing Association or licensed by a state board of examiners.

Audiometric testing - means detection by the person being tested of a series of pure tones. For each tone, the person indicates the lowest level of intensity that they are able to perceive.

Baseline Audiogram - The audiogram against which future audiograms are compared. Criterion

Sound Level - A sound level of 90 decibels.

Decibel (db) - Unit of measurement of sound level.

Decibels – means the sound energy measured by a sound level meter using the “A” scale. The “A” scale is electronically weighted to simulate the response of the human ear to high and low frequency noise.

Dosimeter - An instrument that integrates a function of sound pressure over a period of time in such a manner that it directly indicates a noise dose.

Hertz (HZ) - Unit of measurement of frequency, numerically equal to cycles per second.

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Medical Pathology - A disorder or disease which should be treated by a physician specialist. NIHL -

Noise Induced Hearing Loss.

Noise Dose - The ratio, expressed as a percentage, of:

- (1) the time integral, over a stated time or event, of the 0.6 power of the measured SLOW exponential time-averaged, squared A-weighted sound pressure and
- (2) the product of the criterion duration (8 hours) and the 0.6 power of the squared sound pressure corresponding to the criterion sound level (90 db).

Otolaryngologist - A physician specializing in diagnosis and treatment of disorders of the ear, nose and throat.

Representative Exposure - Measurements of an employee's noise dose or 8-hour time-weighted average sound level that the employers deem to be representative of the exposures of other employees in the workplace.

Slow Response – means the setting on the sound level meter that averages out impulses of brief duration that would cause wide fluctuation in the sound level meter reading.

Sound Level - Ten times the common logarithm of the ratio of the square of the measured A-weighted sound pressure to the square of the standard reference pressure of 20 micro pascals. Unit: decibels (db). For use with OSHA standard 29 CFR 1910.95, SLOW time response is required.

Sound Level Meter - An instrument for the measurement of sound level.

Standard Threshold Shift (STS) – means a change in hearing threshold relative to the baseline audiogram of an average of 10 dB (corrected for age) at 2000, 3000 and 4000 Hz in either ear.

Time-weighted average - That sound level, which if constant over an 8-hour exposure, would result in the same noise dose as is measured.

Key Responsibilities

MANAGERS AND SUPERVISORS

- Ensure requirements of this program are established and maintained.
- Ensure employees are trained and comply with the requirements of this program.

EMPLOYEES

- Wear hearing protection when required, attend the training, and cooperate with testing and sampling.

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Procedure

Occupational hearing loss is a cumulative result of repeated or continued absorption of sound energy by the ear; employee protection is based on reduction of the noise level at the ear or limiting the employee's exposure time. The Company shall offer hearing protection to all employees exposed to potential high noise levels in working areas and to those employees requesting hearing protection.

Wherever it is not feasible to reduce the noise levels or duration of exposures to those specified in Table D-2, below, ear protective devices shall be provided and used. Ear protective devices inserted in the ear shall be fitted or determined individually by competent persons

TABLE D-2 - PERMISSIBLE NOISE EXPOSURES	
Sound level	
<u>Duration per day, hours</u>	<u>dBA slow response</u>
8	90
6	92
4	95
3	97
2	100
1 1/2	102
1	105
1/2	110
1/4	or less 115

Hearing damage is caused by noise level and duration of exposure to the noise. If, after using the formula below, the equivalent noise exposure exceeds unity (1), then a Hearing Conservation Program will be initiated.

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$F(e) = (T(1) \text{ divided by } L(1)) + (T(2) \text{ divided by } L(2)) + \dots + (T(n) \text{ divided by } L(n))$ where:

$F(e)$ = The equivalent noise exposure factor.

T = The period of noise exposure at any essentially constant level.

L = The duration of the permissible noise exposure at the constant level (from Table D-2).

If the value of $F(e)$ exceeds unity (1) the exposure exceeds permissible levels.

A sample computation showing an application of the formula in paragraph (d)(2)(ii) of this section is as follows. An employee is exposed at these levels for these periods:

110 db A 1/4 hour.

100 db A 1/2 hour.

90 db A 1 1/2 hours.

$F(e) = (1/4 \text{ divided by } 1/2) + (1/2 \text{ divided by } 2) + (1 \text{ 1/2 divided by } 8) F(e) =$

$0.500 + 0.25 + 0.188$

$F(e) = 0.938$

Since the value of $F(e)$ does not exceed unity, the exposure is within permissible limits.

All employees, who work in areas where the exposure to noise levels are 85 decibels or greater for the 8 hour time-weighted average of 85 decibels, must wear hearing protection and Company shall implement a monitoring program to identify employees to be included in the hearing conservation program.

WHEN A HEARING CONSERVATION PROGRAM IS NEEDED

The two construction standards that deal with occupational noise exposure, 29 CFR 1926.101, *Hearing Protection*, and 29 CFR 1926.52, *Occupational Noise Exposure*, both reference the industry standard 29 CFR 1910.95, *Occupational Noise Exposure*, on which this program is based.

Hearing protection will be provided at 85 dbA or greater or when it is not feasible to reduce the noise levels or duration of exposures to those specified in Table D-2 below, ear protective devices shall be provided and used.

Sound level

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90 db A 11/2 hours

$F(e) = (1/4 \text{ divided by } 1/2) + (1/2 \text{ divided by } 2) + (1 \text{ } 1/2 \text{ divided by } 8)$ $F(e) = 0.500 + 0.25 + 0.188$ $F(e) = 0.938$

Since the value of $F(e)$ does not exceed unity, the exposure is within permissible limits.

NOISE MONITORING PROCEDURES

Initially, the implementation of a noise monitoring program is the result of subjective reasoning by the Program Administrator. Indications of excessive noise would include: actual information pertaining to specific machines; personal observation; complaints from employees; and noticed indications of hearing loss. It is requested that employees draw attention to work situations where there is an apparent loudness that possibly requires hearing protection.

The measure of a sound's strength is referred to as "sound level" and it is measured in units called "decibels" (dB). To provide some idea of the loudness of 85 dB, the following comparisons are provided:

<u>Sound of:</u>	<u>Approximate Decibels:</u>
Softest sound heard with normal hearing	0 dB
Ordinary speech at conversational distance	65 dB to 70 dB
Telephone dial tone	80 dB
Train whistle at 500 feet	90 dB
Power mower	107 dB
Jet engine at 100 feet	140 dB
Gun Shot	140 dB

Sound levels above 80 dB may become uncomfortable; sound above 125 dB may be painful.

Individual occupational sound exposures above 85 dB do not trigger the need for noise monitoring or a Hearing Conservation Program -- it is when the equivalent noise exposure factor exceeds unity. The two factors that cause occupational hearing loss are: 1) loudness and 2) the duration of time one is exposed to that loudness. **In spite of the above**, when information indicates employee exposure may equal/exceed the 8 hr

time-weighted avg. of 85 decibels, the monitoring program will be implemented to identify employees to be included in the hearing conservation program.

Hearing loss generally occurs over a lengthy period of time. Of course, as one would reasonably expect, acoustic trauma to your hearing can cause instant and permanent damage.

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Our monitoring program is designed to identify:

- Areas where feasible administrative controls may be implemented to reduce noise exposure.
Example: shorter exposure times.
- Areas where feasible engineering controls may be implemented to reduce noise exposure.
Example: soundproofing.
- Which employees should be included in our hearing conservation program?
- The types of hearing protection to be used.

Noise monitoring equipment and procedures will be determined by employee mobility; variations in workplace sound levels; individual types of noise such as impact, impulse, or steady stream; and/or the noise type combinations.

NOISE LEVEL MONITORING

The monitoring equipment and procedures will be designed to determine the actual sound levels that reach the employee's ears and the length of time there is exposure to those levels.

Noise level monitoring is generally conducted by using either a dosimeter, a sound level meter, or both. Because a sound level meter takes one measurement at one point in time, it is useful when sound is fairly constant and the employee is not moving in and out of the noise area.

A dosimeter, on the other hand, stores sound level measurements and can produce an average noise exposure which can be calculated into an 8-hour time weighted average. When using a dosimeter in an area where employees are exposed to varying sound levels or they move in and out of the noise area, the dosimeter is actually worn and the sound pick-up is placed close to the employee's ear to get an accurate measurement of the sound level exposure. Generally, a dosimeter is the best choice for a job site.

Noise level monitoring results, as well as 29 CFR 1910.95, will be made available to affected employees and copies of these items be **posted** in the workplace.

MONITORING PLAN

All continuous, intermittent and impulsive sound levels from 80 dB to 130 dB will be integrated into the noise measurements.

All instruments to measure employee noise exposure will be calibrated to ensure measurement accuracy. Representative personal sampling will be used, in lieu of area sampling, when there is high employee mobility, significant variations in sound levels, or a significant component of impulse noise.

Area sampling will be used when sound levels are relatively constant and employees have a constant exposure to them.

When there is a change in job site activity or equipment which would likely increase noise levels, additional monitoring will be undertaken.

- All persons found to be exposed to sound levels at or above the action level will be notified.
- Affected employees or their representatives will be allowed to observe the noise monitoring process.

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NOISE LEVEL MONITORING RECORDS

All noise level monitoring records will be kept for a period of two (2) years.

SURVEYS

Surveys will be conducted by a qualified employee or third party.

To evaluate noise exposure in terms of possible hearing damage, it is necessary to know the overall sound level ("A" scale measurement), the exposure time of the individual in hours per day and the length of time the individual has worked in the area being surveyed. This data shall be supplemented by the following:

- Name of area and location
- Date and time of survey
- Name of person conducting survey
- Description of instrument used, model and serial number
- Environmental conditions
- Description of people exposed

Company shall notify each employee of their monitoring results, or, if their job is exposed to noise 85 decibels or greater.

A plot of noise levels must be made for owned facilities. The plot must be filed or posted at the facility. Company shall evaluate hearing protector attenuation for the specific noise environments. The adequacy of hearing PPE shall be reevaluated whenever noise exposures increase to the point that the PPE provided may no longer provide adequate protection. Company shall then provide more effective PPE where necessary.

All sound measuring equipment must be calibrated before and after each survey. Records of sound measuring equipment calibration and noise level surveys shall be kept for 20 years.

Noise Surveys must be repeated whenever changes in the workplace may expose additional personnel to high noise or hearing protection being used by employees may not be adequate to reduce the noise exposure to a level below 85 decibels.

Sound Level Surveys

- All owned facilities that are suspected of having noise levels exceeding 85 decibels must be screened.

Exposure Surveys:

- A representative sampling of employees shall be conducted to determine the exposure to noise over a period of time.
- Noise dosimeters must be capable of integrating all continuous, intermittent and impulsive sound levels from 80 dB to 130 dB and must be calibrated so a dose of 50% corresponds to a time weighted average of 85 dB.

SIGNAGE

Clearly worded signs shall be posted at entrances to, or on the periphery of, areas where employees may be exposed

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to noise levels in excess of 85 decibels. These signs shall describe the hazards involved and the required protective actions.

AUDIOMETRIC TESTING

Each employee who is exposed to noise 85 decibels (8 hr TWA) or greater must take an audiogram annually.

- An employee must receive a baseline audiogram within six months of their first exposure to 85 decibels or greater for an eight hour period.
- An employee shall receive an annual audiogram every year they work in a position that is exposed to noise 85 decibels or greater.
- A qualified third party shall perform all audiometric testing, evaluation, reporting and retesting.
- Audiometric testing shall be preceded by a period of at least 14 hours during which there is no exposure to workplace sound levels in excess of 80 decibels.
- This requirement may be met by the use of hearing protectors that reduce the employee noise exposure level below 80 decibels.
- An otoscopic exam is required before an audiogram is initiated. A qualified person shall examine the ear canal for any ear infections or canal irregularities that might affect the audiogram or rule out the use of earplugs.

Annual audiograms shall be evaluated as follows:

- Each audiogram shall be compared to the employees' baseline audiogram to ensure the test was valid and to determine if a standard threshold shift has occurred.
- If a standard threshold shift is determined, the employee will be retested within 30 days.
- The retest results will be considered as the annual audiogram.
- Employees shall be informed of their audiometric test results in writing within 21 days of determination.
- If the employee has sustained a standard threshold shift, after retesting, that employee shall be retrained and refitted for appropriate hearing protection.
- The employee shall be referred for additional medical evaluation if indicated.

Employee audiograms are considered medical/exposure records. These records must be kept for the length of employment plus 30 years.

HEARING PROTECTION DEVICES

Earmuffs and earplugs shall be made available to the employee (at no cost) in sizes and configurations that will be comfortable to the employee. These hearing protection devices shall be made available to all employees exposed to an 8 hour time-weighted average of 85 db at no cost to employees. Employees shall be instructed how to obtain the proper fit. Plain cotton is not an acceptable protective device.

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Training

A training program shall be established to inform employee, on an annual basis, of the effect of noise on hearing; the purpose of hearing protectors, including the advantages, disadvantages and alternatives of various types, including instructions on selection, fitting, use and care; and the purpose of audiometric testing and an explanation of test procedures.

Training shall be updated to be consistent with changes in the work process and PPE requirements.

All staff shall have a copy of this program and it shall be posted at the worksite and a copy made available to all employees, their representatives and regulatory agencies.

The training must be documented.

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Purpose

The purpose of this program is to reduce the potential for heat illnesses by making employees aware of heat illnesses, ways to prevent illness, and actions to take if symptoms occur. Employees who work in outdoor places of employment or who work in other environments where environmental risk factors for heat illness are present are at risk for developing heat related illnesses if they do not protect themselves appropriately.

Scope

This program is applicable to all Company employees while engaged in work at Company facilities and/or facilities operated by others.

Definition

Heat Illness – Means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

Heat Stroke – Heat stroke occurs when the body can no longer cool itself and body temperature rises to critical levels.

Symptoms:

- Confusion.
- Irrational behavior.
- Loss of consciousness.
- Convulsions.
- Lack of sweating.
- Hot, dry skin.
- Abnormally high body temperature.

Heat Exhaustion – Heat exhaustion occurs when the body can no longer keep blood flowing to supply vital organs and at the same time send blood to the skin to reduce body temperature.

Symptoms:

- Weakness.
- Difficulty continuing work.
- Headache.
- Breathlessness.

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- Nausea or vomiting.
- Feeling faint or actually fainting.

Heat Cramps – Heat cramps are the intermittent, involuntary spasm of muscles that occur in an individual who is physically active (for example, working or exercising) in hot or humid weather.

Symptom:

- Loss of salt through excessive sweating.
- Cramping in back, legs and arms

Heat Rash (or Prickly Heat) – Heat rash is a red or pink rash usually found on body areas covered by clothing. It can develop when the sweat ducts become blocked and swell and often leads to discomfort and itching.

Symptoms:

- Red blotches and extreme itchiness in areas persistently damp with sweat.
- Prickling sensation on the skin when sweating occurs.

Acclimatization – Means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.

Environmental risk factors for heat illness – Means working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees.

Personal risk factors for heat illness – Means factors such as an individual's age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention or other physiological responses to heat.

Preventative recovery period – Means a period of time to recover from the heat in order to prevent heat illness.

Shade – Means blockage of direct sunlight. Canopies, umbrellas and other temporary structures or devices may be used to provide shade. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For instance, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning.

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Responsibilities

EHS MANAGER

- The EHS Manager has the responsibility of developing a written program that complies with the requirements of regulatory body (OSHA).
- Assisting with providing training tools to all potential employees who may be impacted and their supervisors / foremen on the risks and prevention of heat illness, including how to recognize symptoms and respond when they appear.
- Initiate and oversee heat illness prevention training.

MANAGER

- Identifying all employees who are required to work outdoors or in other environments where potential heat illness could occur and identify the foreman of the employee.
- Assuring that adequate water, shade, and necessary rest breaks are available when the environmental risk factors for heat stress are present.
- Ensuring that all affected employees are trained on heat illness prevention.
- Ensuring that the requirements in this document are followed.

FOREMAN / SUPERVISOR

- Give workers frequent breaks in a cool area away from heat.
- Adjust work practices as necessary when workers complain of heat stress.
- Monitor the workplace to determine when hot conditions arise.
- Increase air movement by using fans where possible.
- Make allowances for workers who must wear personal protective clothing (welders, etc.) and equipment that retains heat and restricts the evaporation of sweat.
- Schedule hot jobs for the cooler part of the day; schedule routine maintenance and repair work in hot areas for the cooler times of the day.

EMPLOYEES

- Complying with the provisions of the Heat Illness Prevention Program, as described in this document and in the training sessions they have attended.
- Ensuring that they have the appropriate amount of drinking water available at all times when the environmental risk factors for heat illness are present.

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- Ensuring they have access to a shaded area to prevent or recover from heat related symptoms.
- Reporting heat related illness symptoms to the foreman / supervisor

Requirements

HAZARD IDENTIFICATION

All employees shall be identified who are required to work where environmental factors for heat illness are present.

Job sites / projects where environmental factors for heat illness are present shall be identified.

WORKSITE ASSESSMENTS

Initial assessments of all worksites shall be made by the manager or foreman to minimize the effects of heat exposure and make changes when deemed necessary due to changes of the work environment (ex., change in a work process, personal protective equipment requirement, etc.). During the work site assessment, the following factors shall be considered;

- Environmental conditions
- Physical load imposed by job related tools and equipment
- Level and duration of work
- Rest areas
- Personal adaptation (acclimatization)
- Availability of potable water

WATER CONSUMPTION AND AVAILABILITY

Employees shall have access to potable water. All workers whether working individually or in smaller crews, will have access to drinking water.

ACCESS TO SHADE

Employees who may be suffering from a heat related illness or when a preventative recovery period is needed shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling. This cooling period

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should be no less than 5 minutes. Such access to shade shall be permitted at all times. Shade areas can include trees, buildings, canopies, lean-tos, or other partial and/or temporary structures that are either ventilated or open to air movement. The interior of cars or trucks are not considered shade unless the vehicles are air conditioned or kept from heating up in the sun in some other way.

High Heat Procedures

High Heat Procedures are additional preventive measures that this company will use when the temperature equals or exceeds 90 degrees Fahrenheit.

- Effective communication by voice, direct observation (applicable for work crews of 20 or fewer), mandatory buddy system, or electronic means will be maintained so that employees at the worksite can contact a supervisor when necessary. If the supervisor is unable to be near the employees (to observe them or communicate with them), then an electronic device, such as a cell phone or text messaging device, may be used for this purpose if reception in the area is reliable.
- Frequent communication will be maintained with employees working by themselves or in smaller groups (via phone or two-way radio), to be on the lookout for possible symptoms of heat illness. The employee(s) will be contacted regularly and as frequently as possible throughout the day since an employee in distress may not be able to summon help on their own.
- Effective communication and direct observation for alertness and signs and symptoms of heat illness will be conducted frequently. When the supervisor is not available, a designated alternate responsible person must be assigned to look for signs and symptoms of heat illness. If a supervisor, designated observer, or any employee reports any signs or symptoms of heat illness in any employee, the supervisor or designated person will take immediate action commensurate with the severity of the illness.
- Employees will be reminded constantly throughout the work shift to drink plenty of water and take preventative cool-down rest breaks when needed.
- Pre-shift meetings will be held before the commencement of work to review the high heat procedures, encourage employees to drink plenty of water, and remind employees of their right to take a cool-down rest when necessary.
- Supervisors will ensure that workers follow the ANSI work/rest schedule
- All employees will be required to take the cool-down rest periods. Merely offering the opportunity for a break is not enough.
- Once the temperature equals or exceeds 90 degrees Fahrenheit, records will be kept documenting the fact that mandatory cool-down rest periods are provided and taken.

Procedures for Acclimatization:

- Acclimatization is the temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. In more common terms, the body needs time to adapt when

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temperatures rise suddenly, and an employee risks heat illness by not taking it easy when a heat wave or heat spike strikes, or when starting a new job that exposes the employee to heat to which the employee's body hasn't yet adjusted.

- Inadequate acclimatization can be significantly more perilous in conditions of high heat and physical stress. Employers are responsible for the working conditions of their employees, and they must implement additional protective measures when conditions result in sudden exposure to heat their employees are not accustomed to.
- The weather will be monitored daily. The supervisor will be on the lookout for heat waves, heat spikes, or temperatures to which employees haven't been exposed for several weeks or longer.
- During a heat wave or heat spike, the workday will be cut short (e.g., 12:00 p.m.), be rescheduled (e.g., conducted at night or during cooler hours), or if at all possible, cease for the day.
- New employees and those who have been newly assigned to a high heat area will be closely observed by the supervisor or designee for the first 14 days. The intensity of the work will be lessened during a two-week break-in period by using procedures such as scheduling slower paced, less physically demanding work during the hot parts of the day and the heaviest work activities during the cooler parts of the day (early morning or evening). Steps taken to lessen the intensity of the workload for new employees will be documented.
- The supervisor or the designee will be extra vigilant with new employees and stay alert to the presence of heat-related symptoms.
- New employees will be assigned a "buddy," or experienced coworker, so they can watch each other closely for discomfort or symptoms of heat illness.
- During a heat wave, all employees will be observed closely (or maintain frequent communication via phone or radio) for possible symptoms of heat illness.
- Employees and supervisors will be trained on the importance of acclimatization, how it is developed, and how these company procedures address it.

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Training

Heat Illness prevention awareness and training shall be provided to all potentially impacted employees working where environmental risk factors for heat illnesses are present. Supervisors / foremen and team leaders will also be trained to recognize the dangers of heat illnesses. All affected employees training will include but, not limited to the following;

- The different types of heat illness and the common signs and symptoms of heat illness
- The importance of immediately reporting to the employer, directly or through the employee's supervisor, symptoms or signs of heat illness in themselves, or in co-workers
- The environmental and personal risk factors that cause heat related illnesses
- The importance of frequent consumption of small quantities of water, up to 4 cups per hour under extreme conditions of work and heat
- Procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider

All training records on Heat Illness Prevention Program shall be maintained and managed in accordance with GISG safety program requirements.

PROGRAM EVALUATION

The EHS Manager will periodically review this program for compliance with all applicable regulatory standards (OSHA). Updates will be provided to all employees during training or as needed.

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Work/Rest Schedule for Workers Wearing Normal Clothing
This is based on Air Temperature.

Temperature (°F)	Light Work Minutes Work/Rest	Moderate Work Minutes Work/Rest	Heavy Work Minutes Work/Rest
90	Normal	Normal	Normal
91	Normal	Normal	Normal
92	Normal	Normal	Normal
93	Normal	Normal	Normal
94	Normal	Normal	Normal
95	Normal	Normal	45/15
96	Normal	Normal	45/15
97	Normal	Normal	40/20
98	Normal	Normal	35/25
99	Normal	Normal	35/25
100	Normal	45/15	30/30
101	Normal	40/20	30/30
102	Normal	35/25	25/35
103	Normal	30/30	20/40
104	Normal	30/30	20/40
105	Normal	25/35	15/45
106	45/15	20/40	Caution
107	40/20	15/45	Caution
108	35/25	Caution	Caution
109	30/30	Caution	Caution
110	15/45	Caution	Caution
111	Caution	Caution	Caution
112	Caution	Caution	Caution

Adjustments based on:

Environmental conditions	Humidity
Full sun (no clouds); Add 13 °F	40% humidity; Add 3 °F
Partly cloudy/overcast; Add 7 °F	50% humidity; Add 6 °F
Nighttime/shade; no adjustment	60% humidity or more; Add 9 °F

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Examples of Work at Different Intensity Levels

Light work	Moderate work	Heavy work
Operating equipment	Jack-leg drilling	Climbing
Inspection work	Installing ground support	Carrying equipment/supplies weighing 40 pounds or more
Walking on flat, level ground	Loading explosives	Installing utilities
Using light hand tools (wrench, pliers, etc). However, this may be moderate work depending on the task	Carrying equipment/supplies weighing 20-40 pounds	Using hand tools (shovel, pick, scaling bar) for extended periods
Travel by conveyance	Using hand tools (shovel, pick, scaling bar) for short periods	

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Purpose

The purpose of this program is to assure a safe work environment during welding, cutting, and hot work operations.

Scope

This program is applicable to all employees directly involved or assisting in the welding, cutting or hot work operations. When work is performed on an owned or operated site, the operator's program shall take precedence. However, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Operators of equipment should report any equipment defect or safety hazards and discontinue use of equipment until its safety has been assured. Repairs shall be made only by qualified personnel. If welding and cutting cannot be conducted safely, the welding and cutting operation shall not be performed.

Definitions

Examples of Hot Work - Cutting, Brazing, Soldering, Thawing Pipes, Grinding, using an electric tool in a hazardous area and Welding.

Special Hazard Occupancies - any area containing Flammable Liquids, Dust Accumulation, Gases, Plastics, Rubber and Paper Products.

Hazards - includes, but not limited to the following; fires and explosions, skin burns, welding "blindness", and respiratory hazards from fumes and smoke.

Key Responsibilities

MANAGERS AND SUPERVISORS

- Determine if property is safe for welding and cutting operations.
- Establish safe areas for welding and cutting operations.
- Provide training for all employees whose task includes heat, spark or flame producing operations such as welding, brazing, or grinding.
- Develop and monitor effective hot work procedures.
- Provide safe equipment for hot work.
- Provide proper and effective PPE for all hot work.
- Monitor all hot work operations.
- Ensure all hot work equipment and PPE are in safe working order.

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- Allow only trained and authorized employees to conduct hot work and conduct inspections of the hot work area before operations begin.
- Ensure permits are used for all hot work outside authorized areas.

EMPLOYEES

- Follow all hot work procedures.
- Properly use appropriate hot work PPE.
- Inspect all hot work equipment before use.
- Report any equipment problems or unsafe conditions.

Procedure

GENERAL

Before cutting or welding is permitted, the area shall be inspected by a Company supervisor responsible for inspection and granting authorized welding and cutting operations. Precautions that are to be taken shall be in the form of a written Hot Work permit.

Where practical, all combustibles shall be relocated at least 35 feet from the work site. Where relocation is impractical, combustibles will be protected with flameproof covers, shielded with metal, guards, curtains, or the material will be wet down to help prevent ignition.

Ducts, conveyor systems and augers that might carry sparks to distant combustibles shall be protected or shut down.

Where cutting or welding is done near walls, partitions, ceilings, or openings in the floor (grating, manholes, etc.), fire-resistant shields or guards will be provided to prevent ignition.

If welding is to be done on a metal wall, partition, ceiling, or solid decking/flooring, precautions shall be taken to prevent ignition of combustibles on the other side, due to conduction or radiation of heat. Where combustibles cannot be relocated on the opposite side of the work, a Fire Watch person shall be stationed on the opposite side of the work.

Welding will not be attempted on a metal partition, wall, and ceiling or decking/flooring constructed of combustible sandwich panels.

Cutting or welding on pipes or other metal in contact with combustible walls, partitions, floors, ceilings, or roofs shall not be undertaken if the work is close enough to cause ignition by combustion.

Cutting or welding shall not be permitted in the following situations:

- In areas not authorized by management.
- In sprinkled buildings while such protection is impaired.
- In the presence of potentially explosive atmospheres, e.g. flammables.
- In areas near the storage of large quantities of exposed, readily ignitable material.

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- In areas where there is dust accumulation greater than 1/16" within 35' of the area where welding/hot work will be conducted.
- All dust accumulation shall be cleaned up before welding or hot work is permitted.

Whenever welding or cutting is performed in locations where other than a minor fire might develop or any of the conditions mentioned above cannot be met, a Fire Watch will be provided.

- The Fire Watch shall be provided during and for a minimum of 60 minutes past the completion of the welding project.
- Surveillance of the area in which hot work was conducted shall extend to a minimum of 2 hours after completion of hot work.
- The Fire Watch shall be trained in the use of fire extinguishers and the facility's alarm system.
- During this time the Fire Watch will have appropriate fire extinguishers readily available.
- Suitable extinguishers shall be provided and maintained for instant use.
- A hot-work permit will be issued on all welding or cutting outside of the designated welding area. Company's "Hot Work Permit" electronic form shall be used (see Appendix A for an example) unless the customer requires that their permit form be used.

FIRE PREVENTION MEASURES

A designated welding area shall be established to meet the following requirements:

- Floors swept and cleaned of combustibles within 35 feet of work area.
- Flammable and combustible liquids and material will be kept 35 feet from work area.
- Adequate ventilation providing 20 air changes per hour.
- At least one 10 pound dry chemical fire extinguisher shall be within access of 35 feet of the work area.
- Protective dividers such as welding curtains or noncombustible walls will be provided to contain sparks and slag to the combustible free area.

Requirements for welding conducted outside the designated welding area:

- Portable welding curtains or shields must be used to protect other workers in the welding area.
- A hot-work permit must be completed and complied with prior to initiating welding operations.
- Respiratory protection is mandatory unless an adequate monitored airflow away from the welder and others present can be established and maintained.
- Plastic material must be covered with welding tarps during welding procedures.
- Fire Watch must be provided for all hot-work operations.

After welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.

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CONFINED SPACE

- A space that is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example: tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous occupancy.

Refer to Company's Confined Space Program before commencing any welding, cutting, and/or brazing operations in an area meeting the requirements of a confined space.

Ventilation is a pre-requisite to work in confined spaces.

When welding or cutting is being performed in any confined space, the gas cylinders and welding machines shall be left on the outside. Before operations are started, heavy portable equipment mounted on wheels shall be securely blocked to prevent accidental movement.

When a Welder must enter a confined space through a manhole or other small opening, means shall be provided for quickly removing him in case of an emergency.

- When safety belts and lifelines are used for this purpose, they shall be attached to the Welder's body so that it cannot be jammed in a small exit opening.
- An attendant with a pre-planned rescue procedure shall be stationed outside to observe the Welder at all times and be capable of putting rescue operations into effect.

When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes shall be removed from the holders and the holders carefully located so that accidental contact cannot occur and the machine shall be disconnected from the power source.

In order to eliminate the possibility of gas escaping through leaks of improperly closed valves, when gas welding or capping, the torch valves shall be closed and the fuel-gas and oxygen supply to the torch positively shut off at some point outside the confined area whenever the torch is not to be used for a substantial period of time. If practical, the torch and hose shall also be removed from the confined space.

When welding must be performed in a space entirely screened on all sides, the screens shall be arranged so that no serious restriction of ventilation exists. It is desirable to have the screens mounted so that they are about 2 feet above the floor unless the work is performed at so low a level that the screen must be extended nearer to the floor to protect nearby workers from the glare of welding.

A fixed enclosure shall have a top and not less than two sides which surround the welding or cutting operations, and a rate of airflow sufficient to maintain a velocity away from the Welder of not less than 100 linear feet (30 m) per minute.

All welding and cutting operations carried on in confined spaces shall be adequately ventilated to prevent the accumulation of toxic materials or possible oxygen deficiency. This applies not only to the Welder, but also to helpers and other personnel in the immediate vicinity. All air withdrawn will be replaced with air that is clean.

In circumstances for which it is impossible to provide such ventilation, airline respirators or hose masks approved for this

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purpose by the National Institute for Occupational Safety and Health (NIOSH) will be provided.

In areas immediately hazardous to life, a full-face piece, positive pressure, self-contained breathing apparatus or a combination full-face piece, positive pressure supplied-air respirator with an auxiliary, self contained air supply approved by NIOSH must be used.

Where welding operations are carried on in confined spaces and where Welders and helpers are provided with hose masks, hose masks with blowers or self-contained breathing equipment, a worker shall be stationed on the outside of such confined spaces to ensure the safety of those working within.

FUMES, GASES AND DUST

Fumes produced by some welding processes can be toxic and may require source extraction. An assessment of the work to be performed must be completed before each job is undertaken. Fumes generally contain particles from the material being welded. Welding fumes can have an acute effect on the respiratory system.

Any welding, cutting or burning of lead-based metals, zinc, cadmium, mercury, beryllium or exotic metals or paints that could produce dangerous fumes will have proper ventilation or respiratory protection.

Welders and helpers will refer to Company's Respiratory Protection Program to determine the appropriate respiratory protection to be used during welding operations.

All welding and cutting operations shall be adequately ventilated to prevent the accumulation of toxic materials. This applies not only to the Welder, but also to helpers and other personnel in the immediate vicinity.

PERSONAL PROTECTION

Helmets and hand shields shall be made of a material which is an insulator for heat and electricity. Helmets, shields, and goggles shall not be readily flammable and shall be capable of withstanding sterilization.

Helmets and hand shields shall be arranged to protect the face, neck and ears from direct radiant energy from the arc.

Helmets shall be provided with filter plates and cover plates designed for easy removal.

All parts shall be constructed of a material, which will not readily corrode or discolor the skin. Goggles shall

be ventilated to prevent fogging of the lenses as much as practical.

All glass for lenses shall be tempered, substantially free from scratches, air bubbles, waves and other flaws. Except when a lens is ground to provide proper optical vision correction, the front and rear surfaces of lenses and windows shall be smooth and parallel.

Lenses shall bear some permanent distinctive marking which may readily identify the source and shade.

The following is a guide for the selection of the proper shade numbers. These recommendations may be varied to suit the individual's needs.

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Welding Operation		Shade Number
Shielded metal — arc welding 1/16, 3/32, 1/8-5/32" electrodes		10
Gas-shielded arc welding (nonferrous) 1/16, 3/32, 5/32" electrodes		11
Gas-shielded arc welding (ferrous) 1/16, 3/32, 1/8, 5/32" electrodes		12
Shielded metal arc welding: 3/16	7/32, 1/4" electrodes	12
	5/16, 3/8" electrodes	14
Atomic hydrogen welding		10 – 14
Carbon arc welding		14
Soldering		2
Torch brazing		3 or 4
Light cutting, hp to 1"		3 or 4
Medium cutting, 1" to 6"		4 or 5
Heavy cutting, 6" or over		5 or 6
Gas welding (light) up to 1/8"		4 or 5
Gas welding (medium) 1/8 – 1/2"		5 or 6
Gas welding (heavy) 1/2" or over		6 or 8

NOTE:

In gas welding or oxygen cutting where the torch produces a high yellow light, it is desirable to use a filter or lens that absorbs the yellow or sodium line in the visible light of the operation. All filter lenses and plates shall meet the test for transmission of radiant energy prescribed in ANSI Z87.1 — 1968 — American National Standard Practice for Occupational and Educational Eye and Face Protection. Where the work permits the Welder to be enclosed in an individual booth painted with a finish of low reflectivity such as zinc oxide (an important factor for absorbing ultraviolet radiation) and lamp black, or shall be enclosed with noncombustible screens similarly painted. Booths and screens shall permit circulation of air at floor level. Workers or other persons adjacent to the welding areas shall be protected from the rays by noncombustible or flameproof screens or shields or shall be required to wear appropriate goggles.

Adequate hand protection and clothing must be used to protect the body from welding hazards.

CLEANING COMPOUNDS

In the use of cleaning material, because of their possible toxicity or flammability, appropriate precautions such as manufacturer instructions shall be followed.

- Degreasing and other cleaning operations involving chlorinated hydrocarbons shall be located so that no vapors from these operations will reach or be drawn into the atmosphere surrounding any welding operation.
- In addition, trichloroethylene and perchloroethylene shall be kept out of atmospheres penetrated by the ultraviolet radiation of gas-shielded welding operations.

Oxygen cutting, using a chemical flux, iron powder or gas shielded arc cutting for stainless steel shall be performed using mechanical ventilation adequate to remove the fumes generated.

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CYLINDERS

Compressed gas cylinders shall be DOT-approved and legibly marked near the shoulder of the cylinder for the purpose of identifying the gas content with either the chemical or trade name of the gas.

- All compressed gas cylinder connections must comply with ANSI B57. 1-1965 Standards.
- Compressed gas cylinders shall be secured in an upright position at all times except, if necessary, for short periods of time while cylinders are actually being hoisted or carried.

All cylinders shall be kept away from sources of heat and from radiators and piping systems that may be used for grounding purposes. Cylinders and cylinder valves including couplings and regulators shall be kept free from oily or greasy substances and must not be handled with gloves or rags in the same condition.

Stored oxygen cylinders shall be kept at least 20 feet from the fuel gas cylinders or combustible materials, especially oil or grease, or separated by a non-combustible barrier at least 5' high with a fire rating of at least one-half hour. All empty cylinders shall have closed valves. Valve protection caps shall always be in place and hand-tight except when cylinders are in use or connected for use.

Cylinders shall not be kept in unventilated enclosures such as lockers and/or cupboards.

Fuel gas cylinders stored inside buildings shall be limited to a total capacity of 2000 cubic feet (300 pounds) of liquefied petroleum gas, except for those in actual use or attached ready for use.

All acetylene cylinders shall be stored valve-end up.

Assigned storage spaces shall be located where cylinders cannot be knocked over or damaged by falling objects or subject to tampering by unauthorized persons.

- Back flow protection shall be provided by an approved device that will prevent oxygen from flowing into the fuel-gas system or fuel from flowing into the oxygen system.
- An approved device that will prevent flame from passing into the fuel-gas system shall provide flashback protection.
- An approved pressure-relief device set at the appropriate pressure shall provide backpressure protection.

Special care must be taken when transporting gas cylinders:

- Cylinders must be secured with valve cap installed.
- Cylinders shall not be lifted by the valve protection caps, the regulators must be removed and cylinders shall not be dropped or permitted to strike each other.
- Removed regulators must be carried in the cab of the vehicle.
- Cylinders shall not be tampered with, nor should any attempt be made to repair them.
- They shall be handled carefully - rough handling, knocks, or falls are liable to damage the cylinder, valve or safety device and cause leakage.

Safety devices shall not be tampered with.

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ARC WELDING AND CUTTING

All personnel operating, installing and maintaining welding equipment shall be qualified or trained to operate and maintain such equipment.

- All workmen assigned to operate or maintain equipment shall be familiar with electrical welding equipment shall be chosen for safe operation and comply with applicable Requirements for Electric Arc Welding Standards to include: 29 CFR 1910.254, 29 CFR 1910.252 (a)(b) (c) and if gas shielded arc welding is done they must be familiar with the American Welding Society Standard A6-1-1966.
 - o Arc welding equipment must be designed to meet conditions such as exposure to corrosive fumes, excessive humidity, excessive oil vapor, flammable gasses, abnormal vibration or shock, excessive dust and seacoast or shipboard conditions.
 - o It shall be operated at recommended voltage in accordance to the manufacturer recommendations.
 - o All leads shall be periodically inspected and replaced if insulation is broken or splices are unprotected.
 - o Leads shall not be repaired with electrical tape.
- All ground connections shall be checked to determine that they are mechanically strong and electrically adequate for the required current.

A disconnecting switch or controller shall be provided at or near each welding machine with over current protection.

All direct current machines shall be connected with the same polarity and all alternating current machines connected to the same phase of the supply circuit and with the same polarity.

- To prevent electrical contact with personnel, all electrode holders shall be placed where they do not make contact with persons, conducting objects or the fuel of compressed gas tanks.
- All cables with splices within 10 feet of the holder shall not be used.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

If an object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards shall be used to confine the heat sparks and slag and to protect the immovable fire hazards.

RESISTANCE WELDING

All personnel operating, installing, and maintaining welding equipment shall be qualified or trained to operate and maintain such equipment.

- Voltage, interlocks, guarding, grounding and shields shall be in accordance with manufacturer recommendations.

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- Precautions such as flash guarding, ventilation and shields shall be provided to control flashes, toxic elements and metal fumes.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

TRANSMISSION PIPELINE

When arc welding is performed in wet conditions, or under conditions of high humidity, special protection against electric shock shall be supplied.

Pressure testing:

- In pressure testing of pipelines, the workers and the public shall be protected against injury by the blowing out of closures or other pressure restraining devices.
- Protection shall be provided against expulsion of loose dirt that may have become trapped in the pipe.

The welded construction of transmission pipelines shall be conducted in accordance with the Standard for Welding Pipelines and Related Facilities, API Std. 1104-1998.

OXYGEN FUEL GAS WELDING AND CUTTING:

Only approved apparatuses such as torches, regulators or pressure-reducing valves, setting generators and manifolds shall be used:

- Mixtures of fuel gases and air or oxygen may be explosive and must be guarded against.
- All hoses and hose connections shall comply with the Compressed Gas Association and Rubber Manufacturers Associations' applicable standards.
- Workers in charge of the oxygen or fuel-gas supply equipment, including generators, shall be instructed and judged competent by Company before being left in charge.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

FIRE WATCH REQUIREMENTS

A Fire Watch shall be under these conditions as a minimum:

- Locations where other than a minor fire might develop.
- Combustible materials are closer than 35 feet to the point of operation.
- Combustibles that are 35 feet or more away but are easily ignited.
- Wall or floor openings within a 35 feet radius of exposed combustible materials.
- Combustible materials are adjacent to the opposite side of metal partitions, ceilings or roofs.

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Fire Watch personnel MUST be maintained at least a half an hour after welding or cutting operations have been completed.

FIRST AID EQUIPMENT

First aid equipment shall be available at all times. All injuries shall be reported as soon as possible for medical attention. First aid shall be rendered until medical attention can be provided.

Training

Training shall include:

- Position Responsibilities.
- Cutters, welders and their supervisors must be suitably trained in the safe operations of their equipment and the safe use of the process.
- Fire Watch Responsibilities - specifically, the Fire Watch, must know:
 - o That their ONLY duty is Fire Watch.
 - o When they can terminate the watch.
 - o How to use the provided fire extinguisher(s).
 - o To be familiar with facilities and how to activate fire alarm, if fire is beyond the incipient stage.
 - o Operator responsibilities.
 - o Contractor responsibilities.
 - o Documentation requirements.
 - o Respirator usage requirements.

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			Next Revision Date:	8/01/2025
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Purpose

To ensure our employees know the hazards and how to work with Hydrofluoric Acid (HF) safely and how to respond to exposure or spills.

Scope

This program sets forth accepted practices for Hydrofluoric Acid (HF). This program applies to all employees of the Company, temporary employees, and any contractors working for the Company. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

MANAGERS AND SUPERVISORS

- Shall ensure all employees who are to be assigned to work at locations where Hydrofluoric Acid is known to be present, or suspected to be present in any concentration, have been trained in Hydrofluoric Acid safety.
- That each employee has been provided with a copy of this program.

EMPLOYEES

- Employees are responsible to comply with this program.

Procedure

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TOXICITY

- Hydrofluoric Acid is an inorganic acid which is derived from dissolving hydrogen fluoride in water. HF is noncombustible, colorless. HF possesses an irritating odor at or near the OSHA permissible exposure limit (PEL) of 3 ppm in air.
- The National Institute for Occupational Safety and Health immediately dangerous to life or health (IDLH) concentration for HF is 30 ppm in air.
- Hydrofluoric Acid is an extremely corrosive material which attacks all tissues of the body. Contact with the skin results in deep tissue burns that are extremely slow to heal. Contact with dilute (<25%) HF solutions may not be felt until a few hours has past, resulting in major tissue damage. Skin contact with higher concentrations of HF causes immediate and painful burns as well as massive tissue and bone destruction.
- Hydrofluoric Acid penetrates the skin, destroys underlying tissues and attacks the bone. Solutions as weak as 1% will still rapidly permeate the skin and severely damage underlying tissues.
- Hydrofluoric Acid vapor burns the eyes, ultimately leading to blindness. At concentrations of 10 ppm to 15 ppm HF vapors begin to irritate the eyes.
- Brief exposure (5 min) to concentrations greater than or equal to 50 ppm can be fatal. Ingestion of HF leads to severe burns of mouth and throat.
- HF is not a human carcinogen.

GOOD PRACTICES AND PERSONAL PROTECTIVE EQUIPMENT

- HF should be purchased in quantities which prevents abnormal amounts in storage. A three month supply or less is a good rule of thumb. Work with quantities that allow for quick and easy clean up by appropriate personnel if a spill occurs.
- Store Hydrofluoric Acid in original container or polyethylene bottles and in secondary containment.
- Do not use glass!
- Take specific steps to store HF away from ammonia and other bases.
- Proper PPE shall be provided to all employees. Proper PPE must be available for all personnel who work in or enter an HF alkylation unit for any reason.
- COMPANY shall ensure the inspecting protective equipment before use. All protective equipment, including new clothing, should be inspected per the manufacturer's suggested guidelines before use. Procedures should be developed for inspection, testing and replacement of protective clothing and equipment. Testing of gloves and inspection of boots should be done before each use.
- All work with HF must be performed in a chemical fume hood and handled with butyl rubber, neoprene, or double nitrile gloves.
- When using or pouring HF no area of the skin should be exposed.
- When handling solutions of HF, eye protection is a must.
- Proper cleaning of protective clothing is required after each use. Designated areas and facilities should be provided for neutralization, cleaning, and storage of all protective clothing. Since protective

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clothing is acid resistant, not acid proof, it should be washed and neutralized immediately after any contact with HF.

- The locations of safety showers and eye wash stations should be clearly marked and easily accessible.

INCOMPATIBILITIES

- HF attacks glass, concrete, and many metals.
- It also attacks organic materials, leather, natural rubber, and wood. Care should be taken to properly store HF with other acids and always with secondary containment.
- Do not store HF in glass containers!
- Store HF in its original container.

SPILLS

- If you spill a small amount (minor spill) of Hydrofluoric Acid vacate the area and notify your supervisor for cleanup assistance.
- A major spill is any amount of chemical that the staff cannot easily and safely clean up without outside assistance. In this case, call your supervisor.
- If skin contact occurs, follow instructions for the use of calcium gluconate. A tube of calcium gluconate gel (antidote) should be readily available. Calcium gluconate works by combining with the HF to form insoluble calcium fluoride, thus preventing the extraction of calcium from tissues, bones, and the resulting burns.
- Calcium gluconate should be stored in a refrigerator, if possible, and replaced with a fresh supply just prior to its expiration date noted on the tube and packaging.
- All persons using HF shall be aware of the location and proper application of the gel.

EXPOSURE

- Only authorized employees shall enter HF areas. The HF alkylation unit should be distinctively marked at all points of entry. Such markings should warn people that HF is present, that access is strictly limited and that protective clothing is required.
- First-aid kits are readily available in areas that HF may be present. Suitably equipped first-aid kits should be readily available in HF alkylation units and other areas of the refinery or facility where HF may be present.
- In the case of skin contact first aid must be started within seconds. If the skin contact is local, immediately remove any contaminated clothing and wash the area with water for 15 min. Apply generous amounts of calcium gluconate gel to the area.
- Gently massage the gel into the contaminated areas while using gloves.
- White specks appearing around the burned region indicates the formation of calcium fluoride and that the gel is working. Gently apply the gel for 15 minutes and reapply when the pain flares up.

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- If larger amounts of HF are spilled, or if HF is spilled in a difficult area to wash, remove clothing and proceed immediately to the nearest safety shower. After showering apply the calcium gluconate gel.
- It is important to realize that calcium gluconate gel WILL NOT adequately neutralize the effect of HF on tissue by itself.
- Rinsing with water prior to application of the gel is critical.
- Notify medical responders where spill took place in.
- In case of eye contact, rinse the eyes with large amounts of water for a minimum of 5 min. and seek medical attention.
- Do not apply calcium gluconate gel to the eyes.
- If HF is ingested, contact medical help. Do not induce vomiting. If conscious, have the injured person ingest a glass of milk or milk of magnesia. If vomiting occurs naturally, help the person so they do not choke on the vomit.
- If HF vapor is inhaled, move the person to fresh air and seek medical attention at once.

DISPOSAL

- Hydrofluoric acid meets the requirements of a hazardous waste.
- Waste Hydrofluoric Acid must be placed in a compatible container (not glass), labeled with red hazardous waste tags and the tags need to be properly filled out.
- On the back of the waste tag, check off the box marked "corrosive."
- Place the waste container in a satellite accumulation area in secondary containment.
- Make sure the waste bottle is fitted with a proper screw cap.

Training Employees on the Hazards of Hydrofluoric Acid (HF)

All personnel should receive at a minimum an overview on the hazards of HF, including medical treatment of burns, where the chemical is located on site and what to do in the unlikely event that a release has occurred.

Personnel trained in HF first aid should be available on all shifts. Personnel trained in HF first aid and knowledgeable about the specific health effects of HF should be available on all shifts.

Training shall be documented.

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Purpose

The purpose of this program is to establish minimum requirements for site specific H2S safety, which will enhance safety in the occupational setting where hydrogen sulfide is present or is recognized as being potentially present.

Scope

This program sets forth accepted practices for Hydrogen Sulfide (H2S). This program applies to all employees of the Company, temporary employees, and any contractors working for Company. When work is performed on a non- owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

MANAGERS AND SUPERVISORS

- Shall ensure all employees who are to be assigned to work at locations where hydrogen sulfide is known to be present, or suspected to be present in any concentration, have been trained in hydrogen sulfide safety.
- To ensure employees have been medically approved to wear respirators and trained on the safe use of respirators, including a respirator fit test in accordance with the Company's Respiratory Protection Program.
- To ensure employees have been trained and familiar with personal H2S monitors and gas detection instruments.
- To have been provided with the client's safety procedures.
- To ensure the necessary respiratory equipment to perform the work safely is available.
- That each employee has been provided with a copy of this program.

EMPLOYEES

- Employees are responsible to comply with this program.

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Procedure

CHARACTERISTICS OF HYDROGEN SULFIDE (H2S) GAS

H2S is a colorless gas that has the odor of rotten eggs. The program must include that H2S is a toxic gas that is flammable, corrosive, water soluble, and creates toxic byproducts when burned:

- Toxicity – See table below. Hydrogen sulfide is a very dangerous and deadly gas - it is colorless and heavier than air. It can accumulate in low places and in small concentrations. Exposure to certain concentrations of H2S can cause serious injury or death.
- Color - H2S is colorless – you can't see it.
- Odor – it has a strong, pungent, somewhat distasteful odor similar to rotten eggs. In higher concentrations, it can deaden the sense of smell (olfactory nerve). Do Not Rely On Smell To Detect H2s – Rely Strictly On Instruments Designed To Measure Concentrations Of H2S.
- Solubility – H2S mixes with water.
- Flammability – H2S is an explosive gas.
- Toxic By Products – H2S presence can create sulfur dioxide which can ignite without warning
- Density in Air – see below chart.

TOXIC EFFECTS OF HYDROGEN SULFIDE

CONCENTRATION	PHYSICAL EFFECT
.01 PPM	Can smell odor.
10 PPM	Obvious and unpleasant odor. Beginning eye irritation. ANSI permissible exposure level for 8 hours (enforced by OSHA).
100 PPM	Immediately Dangerous to life or Health (IDLH) Kills smell in 3-15 minutes; may sting eyes and throat. May cause coughing and drowsiness. Possible delayed death within 48 hours.
200 PPM	Kills smell shortly, stings eyes and throat. Respiratory irritation. Death after 1-2 hours exposure.
500 PPM	Dizziness; breathing ceases in a few minutes. Need prompt rescue breathing (CPR). Self-rescue impossible because of loss of muscle control.
700 PPM	Unconscious quickly; death will result if not rescued promptly. 1000 PPM Unconscious at once, followed by death within minutes.

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Health Effect of Acute and Chronic Exposures to Hydrogen Sulfide (H2S) Gas

H2S is an irritant and a chemical asphyxiant with regards to oxygen utilization and the central nervous system. Inhalation of H2S gas at high concentrations may result in death. The negative health effects of Hydrogen Sulfide include

- Acute health effects include irritation of the eyes, nose, throat, and respiratory system.
- Chronic exposures to low doses of H2S may lead to high blood pressure, chronic headaches, nausea, and sleep disorders.

EXPOSURE LIMITS

The occupational exposure limit (OEL) or the permissible exposure limit (PEL) that COMPANY limits employee exposure to H2S, as stated as an eight-hour time weighted average (TWA). The OSHA PEL for Construction is 10 parts per million (ppm) as an eight-hour TWA and the OEL followed by ANSI, API, and NIOSH is 10 ppm as an eight-hour TWA. OSHA General industry standards do not offer a PEL for industry, instead an accepted ceiling concentration (ACC) of 20 ppm is used.

GENERAL REQUIREMENTS

Contingency Plan

COMPANY should develop and communicate contingency plan provisions. Employees must be aware of and follow site specific contingency/emergency plans and owners contingency plan provisions.

Methods of Detecting H2S and Alarms

Each person entering a H2S designated location, regardless of the concentration, shall wear a personal monitor. Alarms will sound on personal and area monitors if the exposure limit exceeds 10 parts per million (ppm) or 20 ppm. If the Company is subject to the 29 CFR 1926 Construction industry standards may not exceed 10 ppm.

Emergency Actions to Be Followed

Emergency actions that employees are to follow when hydrogen sulfide (H2S) alarms are activated/sound indicating a release of hydrogen sulfide (H2S), are that affected employees must don self-contained breathing apparatus (SCBA) and/or evacuate the area.

Types of Respirators to be Used with H2S

For concentrations exceeding 10ppm supplied air respirators of a self-contained breathing apparatus must be used.

- Each person entering the H2S location shall don a personal H2S monitor prior to entry.

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- A tailgate meeting will be held with everyone on location to discuss the work plan, the responsibilities of each person and the site specific contingency plan.
- Only COMPANY employees may wear COMPANY respirator equipment.
- If COMPANY employees will use client or other third party equipment, the equipment must be inspected to ensure it is safe to use and meets COMPANY requirements.

SAFETY PRECAUTIONS AND REPORTING REQUIREMENTS

- Maintain compliance with permit requirements of COMPANY and any requirements by the client.
- Verify that proper safety equipment is available, functioning properly and is utilized.
- Check and remain aware of wind conditions and direction.
- Perform a thorough check of the downwind area prior to the start of any potentially hazardous work activity.
- Check for other personnel and ignition sources.
- Ventilate work areas by venting and purging lines and vessels prior to beginning any work activities.
- Keep all non-essential personnel away from work areas.
- When monitor alarms sound vacate the area and do not re-enter. Notify or contact necessary personnel, and do not return to work area until clearance is given for re-entry.

REQUIRED EQUIPMENT

The following equipment shall be provided and used as required by this program:

- Methods of detecting H2S - use of portable monitors and will alarm at the appropriate permissible exposure limits.
- Portable H2S gas testing instrument, either electronic or manual pump operated, capable of testing the suspected concentrations of H2S in the system.
- Each testing instrument must be capable of testing the suspected concentrations of H2S by using the manufacturer's recommended calibrated tube or other means of measuring the concentration of gas.
- Testing instruments shall be calibrated periodically according to the manufacturer's recommendation, and at least annually.
- Calibration kits with regulator for calibrating the personal monitor.
- Calibration gas cylinder for testing the personal monitor.
- At least one person (per two workers), equipped with a SCBA will act as a stand-by person and may not participate in the work being performed until the atmosphere has been tested and found to have no H2S present in quantities over 10 PPM. The stand-by person shall be stationed up wind, within 100 feet and in clear view of the workers.
- If an operator or other third party provides the stand-by person, it will be the responsibility of the COMPANY manager/supervisor in charge to verify that the person has been H2S, CPR, and

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First Aid trained, and that they have been provided the proper respiratory equipment.

- Respirator wearers requiring corrective eyewear will be fitted with spectacle kits according to the respirator manufacturer, at no expense to the employee.
- Respirators and their components, including all fittings of hoses, shall not be interchanged, which if done, would violate the approval rating of said respirator or related equipment.

PERMIT CONFINED SPACE ENTRY

There are special precautions to be taken when working inside tanks or vessels (see COMPANY Confined Space safety program). COMPANY has a written confined space program per 29 CFR 1910.146 and employees shall be trained under 1910.146(g).

MEDICAL

Each employee shall have completed a medical evaluation by a physician or licensed health care professional to determine the employee's ability to wear a SCBA respirator as required by the COMPANY Respiratory Protection Program.

Each employee will successfully complete the medical questionnaire and examination before being allowed to be fit tested with a SCBA respirator.

RESCUE

Each employee, when working alone in a H2S designated area, shall plan and become familiar with self-escape procedures to include being aware of wind direction and obstacles to avoid when exiting the work area.

Employees working under the buddy system shall pre-plan an emergency rescue and/or evacuation procedure prior to commencing work and arrange for periodic communications with his/her supervisor and document the discussion on each employee's service report.

RESPIRATOR INSPECTIONS

Respirators will be inspected by the employee before each use and at least monthly.

The inspection will include the respirator face piece, hose, harness, 5minute escape pack cylinder and all other components of the air supply systems used.

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Monthly inspections will be documented as per COMPANY Respiratory Protection Program and will be kept on file at the local office for review during safety audits.

AIR MONITORING REQUIREMENTS

- In areas where H2S may be present monitors shall be used.
- Monitors must be bump tested at a minimum as required by manufacturer, if a monitor fails a bump test then a full calibration is required before use.
- Monitors must be calibrated according to manufacturer's recommendations.

Training

Employees with the potential to be exposed to hydrogen sulfide (H2S) above the stated occupational exposure limit (OEL) or permissible exposure limit (PEL) must be trained in H2S awareness.

Hydrogen Sulfide (H2S) awareness training program for all employees with the potential to be exposed to H2S above the occupational exposure limit (OEL) or permissible exposure limit (PEL) is instructor led classroom training for a minimum of 3.5 hours.

Hydrogen Sulfide (H2S) awareness annual refresher training program for all employees with the potential to be exposed to H2S above the occupational exposure limit (OEL) or permissible exposure limit (PEL) is instructor led classroom training for a minimum of 3.5 hours.

Training for employees with the potential to be exposed to hydrogen sulfide (H2S) gas above the OEL or PEL shall consist of (and be documented for):

- Physical and chemical properties of H2S
- Sources of H2S
- Human physiology
- Signs and symptoms of H2S exposure, acute and chronic toxicity
- Symptomatology of H2S exposure
- Work procedures
- On site specific emergency action plans including site specific evacuation procedures
- State and federal regulatory requirement
- H2S release dispersion models

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- Required elements of OSHA's Respiratory Protection standard, 29 CFR 1910.134, to include medical evaluations, fit testing, and selected respirator training.
- Rescue techniques, first aid, and post exposure evaluation
- Operation and maintenance of the portable and personal gas detection equipment they are expected to use.
- How to accurately calibrate the portable and personal gas detection equipment they are expected to use.
- How to bump test the portable and personal gas detection equipment they are expected to use.

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Purpose

The purpose of this program is to have effective procedures for reporting and evaluating/investigating incidents and non-conformances in order to prevent further occurrences.

Responsibilities

Individual responsibilities for reporting and investigation must be pre-determined and assigned prior to incidents.

EHS Specialist/Manager

Ensures investigations are conducted and assists in identifying corrective actions.

Site Manager and Supervisors

- Investigates (or assists in) incident investigations
- Corrects non-conformances
- Accompany injured employees to the medical provider for initial treatment.

Employees

Immediately report any injury, job related illness, spill or damage to any property to their immediate supervisor. If their immediate supervisor is not available, the employee is then to immediately notify the manager. Employees who could be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

Definitions

Accident – an unplanned, unexpected event that interrupts normal activity and leads to and includes personal injury or dollar loss to equipment and/or property that upon investigation is deemed unpreventable.

Incident – an unplanned, unexpected event that interferes with or interrupts normal activity and potentially leads to and includes personal injury or dollar loss to equipment and/or property and is preventable.

“At Risk” Behavior – Any behavior that an employee engages in without regard to safety rules, standards, procedures, instructions, and specific criteria in the system.

“At Risk” Condition – A condition in the workplace that is likely to cause property damage or injury.

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Good Catch – Groome/Expro’s term for a potential hazard or incident in which no property was damaged, and no personal injury was sustained, but where, given a slight shift in time or position, damage, or injury easily could have occurred. Sometimes referred to as a “near miss,” “close call,” “near hit,” or “injury-free event.”

Injury Classifications

Injuries shall be classified per the following:

First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household-type injuries.

Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.

Number of Lost or Restricted Work Days – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

Occupational Injury – An injury which results from a work-related activity.

Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.

Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include when an injured associate is kept at work but not performing within the essential functions of their regular job.

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Work or Work-Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non work- related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or from flu shots, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

Procedure

After immediate rescue or response, actions to prevent further loss will occur if the scene is safe. For example, maintenance personnel should be summoned to assess integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special equipment/response requirements such as safe rendering of hazardous materials or explosives employed.

The Supervisor in conjunction with the EHS Specialist/Manager should report minor, work-related injuries and illnesses to Medcor Injury Triage Assessment Services by calling 1-800-775-5866. This nurse triage service is available 24 hours per day / 7 days a week to all Groome/Expro employees.

Concentra occupational health clinic is our preferred occupational health clinic for treating minor work-related injuries and illnesses and shall be considered first for treating all minor, work-related injuries and illnesses.

Investigations of Incidents & Non-Conformances

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformances.

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The following must be reported to the employee's supervisor immediately. If that person is not available, then the Company EHS Specialist/Manager shall be immediately notified for:

- Good Catch incidents with the potential to harm people, the environment or assets
- Work-related injuries or illnesses; property damage including vehicle incidents
- Hazardous chemical spillage, loss of containment and contamination
- Non-conformance to safety or environmental rules, policies or standards

The supervisor shall make the necessary notifications and begin the incident investigation process.

In the case of a major injury or incident, the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Incident investigation occurs as soon as possible, while the facts are still fresh within the minds of those involved (i.e. witnesses). Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

Equipment

Equipment shall be made available and may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, flags, equipment manuals, etc. The EHS Specialist/Manager shall have an incident investigation kit prepared in advance.

Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

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EXTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Owner Client	ASAP	Yes
Injury Above Minor First Aid	911 / Site Medical Response / Owner Client	ASAP	Yes
As Required Injury Reporting	OSHA / Owner Client	Within 8 hrs	Yes
Fire / Explosion	911 / Site Fire Response / Owner Client	ASAP	Yes
Reportable Spill	Site Environmental / Owner Client	ASAP	Yes
Property/Vehicle Damage	Owner Client	ASAP	Yes

INTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	EHS Specialist/Manager/MEDCOR	ASAP	Yes
Injury Above Minor First Aid	EHS Specialist/Manager	ASAP	Yes
As Required Injury Reporting	President then EHS Specialist/Manager	ASAP	Yes
Fire / Explosion	EHS Specialist/Manager	ASAP	Yes
Reportable Spill	EHS Specialist/Manager	ASAP	Yes
Property/Vehicle Damage	EHS Specialist/Manager	ASAP	ASAP

OSHA Notification

OSHA requires reporting of work-related incidents resulting in the death of an employee or the hospitalization of an employee. Owner Clients require all incidents to be reported including, but not limited to, injuries, spills, property damage, fires, explosions, and vehicle damage.

Incident Review Team and Incident Investigation Report

All incidents shall be investigated, and the extent of such investigations shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method determined by the Company EHS Specialist/Manager. An Incident Review Team will be formed to determine the final root cause of incidents using the investigative incident report. The team will consist of representatives of management or other designees as assigned by the Company EHS Specialist/Manager.

Initial identification of evidence immediately following the incident could include a listing of people, equipment, and material involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured and collected through

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notes, photographs, witness statements, flagging, and impoundment of documents and equipment. All shall be dated.

Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed. All items shall be dated.

The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Results of incident investigations are communicated to employees via the Safety Alert Form.

Incident Report Form

The incident report form shall be completed by the Supervisor and/or Project Manager and submitted to EHS for review as soon as possible and no later than 24 hours from the incident date/time. Written incident reports will be prepared and include the Go Canvas Incident Report Form app and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included.

The supervisor completes the Company Incident Report and takes the steps below when beginning an incident investigation.

- Provide emergency assistance, as needed and qualified for.
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident.
- Notify management by phone according to the Incident Notification Matrix.
- Identify potential witnesses.
- Use investigation tools, as needed (camera, drawings, video, etc.).
- Tag-out for evidence any equipment that was involved.
- Interview witnesses (including the affected employee) and obtain written, signed statements and fax to the Company EHS Specialist/Manager.
- Prepare Company Incident Report, sign the form, email it to the Company EHS Specialist/Manager.
- Implement any immediate corrective actions needed.

The EHS Specialist/Manager will review the supervisor's incident report and supporting documentation and will prepare and share the incident investigation report to the Groome/Expro management team via the Accident-Reports@groomeindustrial.com and/or nearmiss@groomeindustrial.com email distribution list as appropriate based on the incident classification.

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Safety Alert Form

Lessons learned will be reviewed and communicated via the Safety Alert Form. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

In order to communicate incident information and lessons learned from incidents, the Company EHS Specialist/Manager shall send the Incident Notice to all work sites. The form shall be emailed to all Groome/Expro employees with a Groome email address via the "Safety News" email distribution. Safety Alerts shall be discussed in safety meetings until all employees at the job site have been informed of the incident. The Safety Alert form shall be communicated in both English and Spanish.

Corrective Actions

Incident investigations should result in corrective actions, individuals should be assigned responsibilities relative to the corrective actions, and these actions should be tracked to closure.

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by the Company EHS Specialist/Manager to ensure timely follow up and completion.

Corrective actions are also used as needed for revisions to site specific safety plans and the Company Safety and Health Management System.

Training

Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques. Training frequency will be based on the specific area of responsibility and be given at least once every two years. Training requirements relative to incident investigation and reporting shall include:

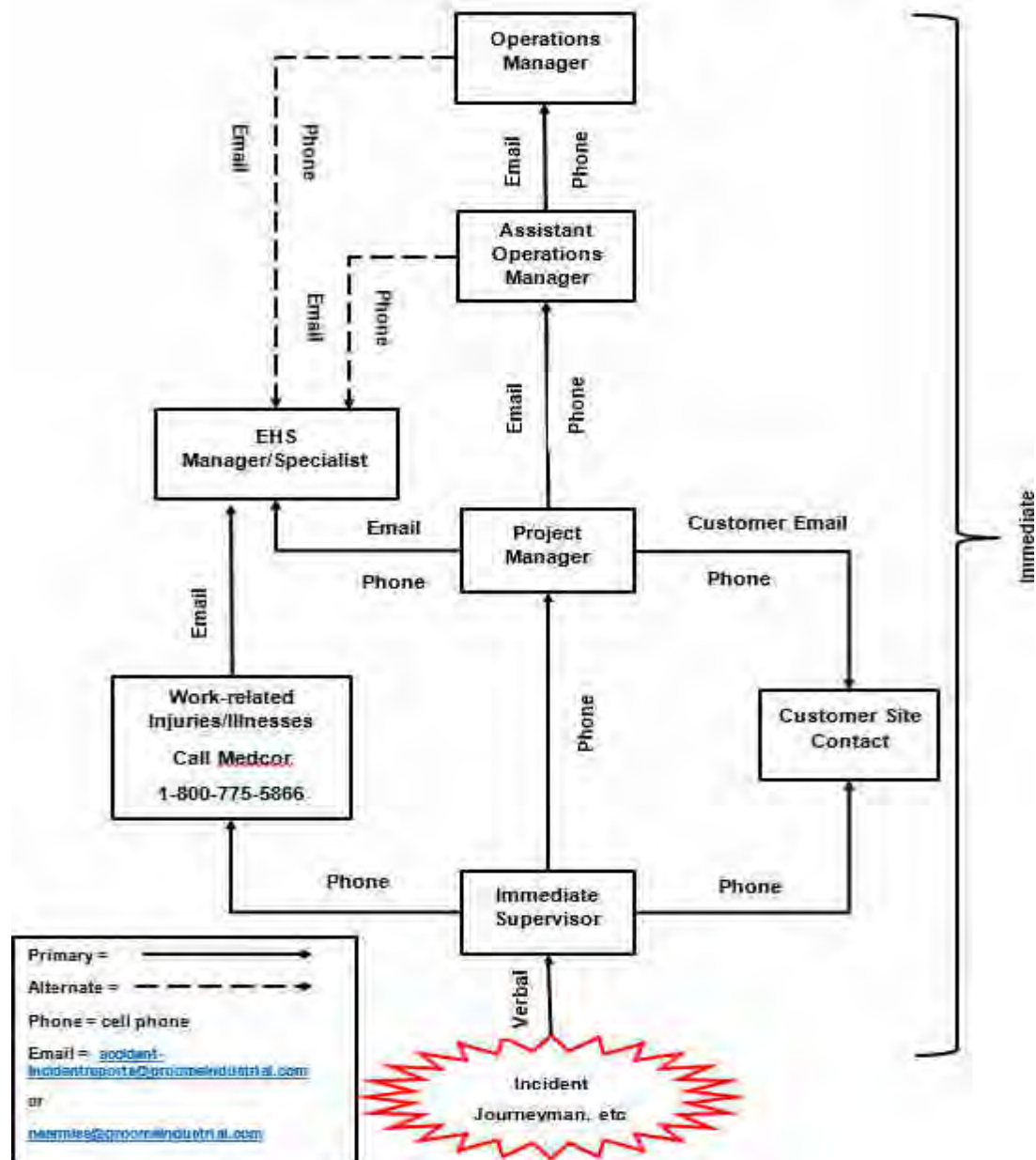
- Awareness
- First Responder Responsibilities
- The Initial Investigation at the Accident Scene
- Managing the Accident Investigation
- Collecting Data
- Analyzing Data

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- Developing Conclusions and Judgments of Need
- Reporting the Results
- Follow-up with Incident Notice Implementation

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Groome Incident Notification Process Flow



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INJURY / ILLNESS RECORDKEEPING			Revision No.	3
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Purpose

The purpose of this program is to define the requirements for recording job related injuries and illnesses for the Company.

Scope

This policy shall cover all Company operations within the United States. Specific guidelines are available at the following website link: <http://www.osha.gov/recordkeeping/index.html>.

Key Responsibilities

EHS MANAGER

- Shall ensure all job-related injuries and illnesses are recorded properly in accordance with OSHA requirements.
- Shall ensure all required postings are conducted in accordance with recordkeeping guidelines.
- Shall maintain all required records.
- Shall determine the proper classification of job-related injuries or illnesses based on OSHA recordkeeping guidelines.

SUPERVISORS

- Shall ensure that all job-related injuries and illness are reported promptly to the Company EHS Manager.

EMPLOYEES

- Shall promptly report any actual or suspected job-related injury or illness.

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Procedure

If the Company is required to keep records of fatalities, injuries, and illnesses, it must record each fatality, injury and illness that is:

- work-related; and
- a new case; and
- meets one or more of the general recording criteria.

The Company must enter each recordable injury or illness on an OSHA 300 Log and 301 Incident Report, or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

A Company executive must certify that he or she has examined the OSHA 300 Log and that he or she reasonably believes, based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete.

The Company must post a copy of the annual summary in each establishment in a conspicuous place or places where notices to employees are customarily posted. The Company must ensure that the posted annual summary is not altered, defaced or covered by other material.

The annual summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.

The Company must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover.

See next page for current OSHA recordkeeping forms as of this date.

[illegible]

U.S. Department of Labor
Occupational Safety and Health Administration
Form approved OMS no: 1218-J176

Information about the employee 1) Full Name _____ 2) Street _____ City _____ State _____ Zip _____ 3) Date of birth _____ 4) Date hired _____ 5) ☐ Male ☐ Female	Information about the case 10) Case number from the Log _____ (transfer the case number from the Log after you record the case) 11) Date of injury or illness _____ 12) Time employee began work _____ AM/PM 13) Time of event _____ AM/PM ☐ Check if time cannot be determined 14) What was the employee doing just before the incident occurred? Describe the activity, as well as the tools, equipment or material the employee was using. Be specific. Examples: "climbing a ladder while carrying roofing materials"; "spraying chlorine from hand sprayer"; "daily computer key-entry".

Information about the physician or other health care professional

6) Name of physician or other health care professional _____

7) If treatment was given away from the worksite, where was it given? _____

Facility _____

Street _____

City _____ State _____ Zip _____

8) Was employee treated in an emergency room?
☐ Yes
☐ No

9) Was employee hospitalized overnight as an in-patient?
☐ Yes
☐ No

15) What happened? Tell us how the injury occurred. Examples: "When ladder slipped on wet floor; worker fell 20 feet"; "Worker was sprayed with chlorine when gasket broke during replacement"; "Worker developed soreness in wrist over time."

16) What was the injury or illness? Tell us the part of the body that was affected and how it was affected; be more specific than "hurt," "pain," or "sore." Examples: "strained back"; "chemical burn, hand"; "carpal tunnel syndrome."

17) What object or substance directly harmed the employee? Examples: "concrete floor"; "chlorine"; "radial arm saw." If this question does not apply to the incident, leave it blank.

18) If the employee died, when did death occur? Date of death _____

Public reporting burden for this collection of information is estimated to average 22 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Persons are not required to respond to the collection of information unless it displays a current valid OMB control number. If you have any comments about this estimate of burden or any other aspect of this data collection, including suggestions for reducing the burden, contact: US Department of Labor, OSHA Office of Statistics, Room 3-N664, 200 Constitution Ave., NW, Washington, DC 20210. Do not send the completed form to this office.

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Purpose

The Company is required to participate as a contract employer at client locations with railroads or tracks. Company has no facilities with railroads or tracks, however, has a duty to ensure the Company or its contractors are aware of the hazards and controls associated with working on or near rails or tracks at a client facility.

Key Responsibilities

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her region are required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Only trained personnel can be involved in working on or near rails or tracks at a client facility.

Procedure

OBTAIN PERMISSION TO WORK IN ADVANCE

Prior to performing work within six (6) feet of any railroad track, permission must be obtained from the owner client railroad supervisor or designated person to take the track out of service. If required, complete a client work permit prior to beginning work.

SAFETY EQUIPMENT

Approved hard hats, high visibility clothing, approved metatarsal boots, gloves and approved safety glasses with permanently attached side shields shall be worn in designated areas associated with rails.

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PROTECTION OF WORKERS FROM MOVING EQUIPMENT

Never attempt to crawl under rail equipment or climb over moving rail equipment or attempt to cross in front of moving equipment.

Never position any part of the body in a potential pinch point. Rail equipment can move in either direction at anytime with no warning.

RAILROAD CROSSING SAFETY

In all cases, pedestrians/employees shall cross at existing designated pedestrian rail crossings where provided. Additionally, vehicle crossings are not intended as pedestrian crossings unless they are so identified and/or located, and no other pedestrian crossings exist in the area.

If a designated rail crossing is not available, the following general safety procedures for crossing railroad tracks shall be followed:

- Do not cross within 10 feet of the end of a parked rail car.
- Do not cross between uncoupled cars.
- Stop, look and listen prior to proceeding across the tracks
- Never step on rails, as they may be slippery.

Training

Appropriate training based on complexity of the job and potential hazards related to in-plant rail hazards shall be provided to all applicable employees. Assessments shall be used to determine whether the employees have the knowledge and have demonstrated skills to safely perform their work assignments.

All training shall be conducted and documented in advance of working on or near in-plant rails. Retraining and testing shall be required for unsatisfactory/unsafe performance of job assignments.

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Purpose

The purpose of this program is to ensure all employees are appropriately trained and competent to perform their job.

Scope

This procedure applies to all Company operations.

Responsibilities

COMPANY EHS MANAGER OR DESIGNEE

- Identifies, updates and monitors minimum qualification requirements, job titles and training documentation.
- Supplies training reports to clients and Company management as requested.

SITE MANAGER AND SUPERVISORS

- Shall ensure all employees assigned to their project meet job competency requirements and complete training identified in the training matrix specific to their location.
- Shall ensure all employees have sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

EMPLOYEES

- Attend and follow requirements of all training provided.

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General

At the Company, our view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities and critical activities.

ORGANIZATIONAL CHART

An organizational chart or a list of job titles/roles has been established by the Company. Based on the positions and their exposure to risk their required training is entered into each worksite's training matrix.

IDENTIFICATION OF MINIMUM QUALIFICATIONS

Minimum qualification requirements are identified for each role by the Company. This may be a combination of education and work experience. Minimum qualifications required to perform each role have been determined and established. Safety training completion for the indicated job title is required before full qualifications are met to allow an employee to begin work.

DOCUMENTATION

Documentation is obtained from employees to demonstrate they meet the qualifications of their job. The Company has established a procedure to ensure that documentation is acquired from employees as proof that they are qualified to perform their job duties. Based on the job description requirements documentation may include educational, certifications, licenses, prior acceptable training course completion, etc. Documentation is reviewed and confirmed as actual during the employee hiring process.

TRAINING AND COMPETENCY NEEDS

Employees (new or transferred) are provided job specific training related to their roles and responsibilities. All employees must be trained on the tasks they perform on a regular basis. Training is identified in our training matrix which specifies safety and health training needs by job title.

All training records are maintained on site either by the Company EHS Manager, management or their designee.

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All training must be documented with: date; employee name, employee signature; instructor name; instructor signature and title of course.

VERIFICATION BEFORE BEING ALLOWED TO WORK

Competency is verified before employees are permitted to perform tasks independently. A competent person (supervisor, lead hand, instructor, etc.) must verify that an employee is competent to perform their roles and responsibilities before being allowed to work independently. If there is a site Short Service Employee (SSE) program established the new or transferred employee will fall under the SSE requirements as well.

Training requirements are tracked by the Company EHS Manager or designee and formal training sessions are conducted either on or off site by the Safety Manager or competent/qualified instructor for the required subject matter.

SUPERVISOR SAFETY MANAGEMENT TRAINING

Supervisors and managers receive annual, documented safety management system training.

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Purpose

The purpose of this written program is to prescribe rules and establish minimum requirements for the construction, care, and use of the common types of ladders.

Scope

This program is applicable to all employees who may utilize ladders. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

MANAGERS AND SUPERVISORS

- Managers and supervisors are responsible for ensuring that all employees, and/or contractors have been trained in the use and inspection of ladders in accordance to the manufacture's guidelines.
- Managers and supervisors are responsible for ensuring that all employees and contractors are aware that if an inspection discovers a defect, the ladder shall not be used and taken out of service.

EMPLOYEES

- Employees shall inspect ladders prior, during and at the completion of each use to ensure the condition of the ladder and the safety of its occupants.
- Employees are responsible for following this program and reporting any damage or repairs that may be needed to their supervisor.

Procedure

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LADDERS MUST MEET REQUIRES OF OSHA AND ANSI

Ladders used by Company employees must meet the requirements of the Occupational Safety and Health Administration (OSHA) and the American National Standards Institute (ANSI).

- The program must state that ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use.
- Rungs, cleats, and steps of portable ladders and fixed ladders (including individual-rung/step ladders) shall be spaced not less than 10 inches apart, nor more than 14 inches apart, as measured between center lines of the rungs, cleats, and steps.
- Rungs, cleats, and steps of step stools shall be not less than eight inches apart, nor more than 12 inches apart, as measured between center lines of the rungs, cleats, and steps.
- Rungs, cleats, and steps of the base section of extension trestle ladders shall not be less than eight inches nor more than 18 inches apart, as measured between center lines of the rungs, cleats, and steps.
- The rung spacing on the extension section of the extension trestle ladder shall be not less than 6 inches nor more than 12 inches, as measured between center lines of the rungs, cleats, and steps.
- The minimum clear distance between the sides of individual-rung/step ladders and the minimum clear distance between the side rails of other fixed ladders shall be 16 inches.
- The minimum clear distance between side rails for all portable ladders shall be 11 1/2 inches.
- The rungs of individual-rung/step ladders shall be shaped such that employees' feet cannot slide off the end of the rungs.
- The rungs and steps of portable metal ladders shall be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.

SAFE WORK PRACTICES OF LADDERS

- Ladders must be inspected by a competent person for visible defects periodically and after any event that could make the ladders unsafe for use.
- Ladders are inspected before initial use in each work shift.
- Load limits for ladders must not be exceeded. Ladders must not be loaded beyond the maximum intended load for which they were built, nor beyond their manufacturer's rated capacity.
- Defective ladders be either tagged or removed from service. Portable ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components, shall either be immediately marked in a manner that readily identifies them as defective, or be tagged with "Do Not Use" or similar language, and shall be withdrawn from service until repaired. Fixed ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, or corroded components, shall be withdrawn from service until repaired. Company shall withdraw a defective ladder from service is satisfied if the ladder is either immediately tagged with "Do Not Use" or similar language, marked in a manner that readily identifies it as defective or blocked (such as with a plywood attachment that spans several rungs).
- Ladders used by Company employees can only be used for the purpose for which they were designed.

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- Each employee faces the ladder when climbing up or down it, each employee uses at least one hand to grasp the ladder when climbing up and down it, and no employee carries any object or load that could cause the employee to lose balance and fall while climbing up or down the ladder.
- Ladders are used only on stable and level surfaces unless they are secured or stabilized to prevent accidental displacement.
- Ladders used by employees to reach a surface above the employees, the side rails of the ladder must extend three feet above the elevated surface. When portable ladders are used for access to an upper landing surface, the ladder side rails shall extend at least 3 feet (.9 m) above the upper landing surface to which the ladder is used to gain access; or, when such an extension is not possible because of the ladder's length, then the ladder shall be secured at its top to a rigid support that will not deflect, and a grasping device, such as a grab rail, shall be provided to assist employees in mounting and dismounting the ladder. In no case shall the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support.
- Extension ladders used by employees must be placed against the top support at a 4:1 slope. Non-self- supporting ladders must be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder (the distance along the ladder between the foot and the top support). The angle is commonly known as a 4:1 ratio, which may be substituted for the language of one-quarter of the working length of the ladder.
- Ladders shall be maintained in good condition at all times, the joint between the steps and side rails shall be tight, all hardware and fittings securely attached, and the movable parts shall operate freely without binding or undue play.
- Metal bearings of locks, wheels, pulleys, etc., shall be frequently lubricated.
- Frayed or badly worn rope shall be replaced. Safety feet and other auxiliary equipment shall be kept in good condition to ensure proper performance.
- Rungs shall be kept free of grease and oil.
- Ladders shall be stored in a well-ventilated area in a manner to prevent sagging and warping.

How to Safely Use Ladders

- Never use ladder in a horizontal position or as scaffolding and do not place ladders on top of boxes, barrels, crates, etc.
- The ladder shall be secured at the top or held by another person at the base.
- The footing of the ladder shall be placed on a stable and level surface.
- When ladders are not able to be extended then the ladder shall be secured at its top to a rigid support that will not deflect.
- Ladders shall not be used in a horizontal position as platforms, runways, or scaffolds.
- Ladders shall not be used by more than one man at a time.
- Ladders shall not be placed in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded.
- If a ladder is used in a high traffic area, barricades shall be placed to avoid accidental displacement due to collisions.

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- Do not stand on the top two rungs or top of step ladders.

On two-section extension ladders the minimum overlap for the two sections in use shall be as follows:

Size of Ladder (feet)	Overlap (feet)
Up to and including 36'	3
Over 36 up to and including 48'	4
Over 48 up to and including 60'	5

- The employee shall maintain a three (3)-point grip on the ladder at all times and carry tools/equipment on a belt or hoist up. Do not carry anything in the hands that could cause injury in case of fall.
- The bracing on the back legs of stepladders is designed solely for increasing stability and not for climbing.
- The ladder shall not be moved while occupied.

PORTABLE LADDERS

Stepladders shall not be longer than 20 feet. Single ladders shall not be longer than 30 feet. A two-section extension ladders shall not be longer than 60 feet. All ladders of this type shall consist of two sections, one to fit within the side rails of the other and arranged in such a manner that the upper section can be raised and lowered.

Keep all ladders at least ten (10) feet away from power lines.

Weight includes the combined weight of the climber and his tools/equipment. Ladders are rated as the following:

- I (holds 250 lbs)
- I-A (holds 300 lbs)
- II (holds 225 lbs)
- III (holds 200 lbs)

FIXED METAL LADDERS

- Ladders shall be constructed to withstand a minimum of 200 pounds.
- All metal rungs shall have a minimum diameter of $\frac{3}{4}$ inches and wooden rungs shall have a minimum diameter of 1 $\frac{1}{8}$ inches.
- Rungs shall not be more than 12 inches apart and shall be uniform throughout the length of the ladder.
- Rungs shall be a minimum length of 16 inches and provide protection, so a foot cannot slip off the end.
- Rungs shall have a minimum of 7 inches between itself and the structure behind it.
- A fall restraint system must be provided for all fixed ladders greater than six feet in length.

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Purpose

The purpose of this procedure is to identify the controls and actions necessary to prevent adverse health effects to employees from occupational exposure to lead, and to ensure that Company lead exposure management practices meet regulatory requirements to include but not limited to:

29 CFR 1910.1025 – Lead

29 CFR 1910.1025 – App A; Substance data sheet for occupational exposure to lead

29 CFR 1910.1025 – App B; Employee standard summary 29 CFR 1910.1025 – App C; Medical surveillance guidelines

29 CFR 1926.62 – Lead

29 CFR 1926.62 – App A; Substance data sheet for occupational exposure to lead 29 CFR 1926.62 – App B;

Employee standard summary

29 CFR 1926.62 – App C; Medical surveillance guidelines Cal/OSHA T8 §1532.1. – Lead

Scope

This procedure applies to Company operations where employees may be exposed to lead while working with lead containing materials during routine maintenance or emergency situations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Recordkeeping

Below is an overview of recordkeeping requirements that pertain to lead abatement activities:

Exposure Assessment:

An accurate record will be established and maintained of all monitoring and other data used in conducting employee exposure assessments as required by 29 CFR 1910.1025(n), i.e., if any employee may be exposed to lead at or above the action level.

No employee will be exposed to lead at concentration levels greater than 50 µm³ averaged over an 8-hour time period. Reference our lead respiratory program.

Exposure Monitoring Records will include:

- the date(s), number, duration, location and results of each of the samples taken if any, including a description of the sampling procedure used to determine representative employee exposure where applicable;
- a description of the sampling and analytical methods used and evidence of their accuracy;
- the type of respiratory protective devices worn, if any;

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- the name, social security number, and job classification of the employee monitored and of all other employees whose exposure the measurement is intended to represent; and
- the environmental variables that could affect the measurement of employee

exposure. Monitoring & other exposure records will be maintained for 30 years.

Medical Surveillance

An accurate medical record will be established and maintained for each employee subject to medical surveillance. This record will include:

- the name, social security number, and description of the duties of the employee;
- a copy of the physician's written opinions;
- results of any airborne exposure monitoring done on or for that employee and provided to the physician; and
- any employee medical complaints related to exposure to lead.

The Safety Program Administrator will keep, or assure that the examining physician keeps, the following medical records:

- a copy of the medical examination results including medical and work history required of those employees within a medical surveillance program as required by 29 CFR 1910.1025(j).
- a description of the laboratory procedures and a copy of any standards or guidelines used to interpret the test results or references to that information;
- a copy of the results of biological

monitoring. Medical records will be maintained for a period of 30 years.

Medical Removals

An accurate record will be established and maintained for each employee removed from current exposure to lead pursuant to paragraph 29 CFR 1910.1025(k),

Medical Removal

Protection. Each record

shall include:

- the name and social security number of the employee;
- the date of each occasion that the employee was removed from current exposure to lead as well as the corresponding date on which the employee was returned to his or her former job status;

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- a brief explanation of how each removal was or is being accomplished; and
- a statement with respect to each removal indicating whether or not the reason for the removal was an elevated blood lead level.

This record (Medical Removal) will be maintained for at least the duration of an employee's employment.

Objective Data for Exemption from Requirement for Initial Monitoring

Objective data are information demonstrating that a particular product or material containing lead or a specific process, operation, or activity involving lead cannot release dust or fumes in concentrations at or above the action level under any expected conditions of use. Objective data can be obtained from an industry-wide study or from laboratory product test results from manufacturers of lead containing products or materials. The data that we use from an industry-wide survey must be obtained under workplace conditions closely resembling the processes, types of material, control methods, work practices and environmental conditions in our current operations.

The record of the objective data relied upon will be maintained for at least 30 years. Availability:

All records required to be maintained by 29 CFR 1910.1025(n), Recordkeeping, will be made available, upon request, to affected employees, former employees, and their designated representatives, and to the Assistant Secretary and the Director for examination and copying.

Training Records:

All employee training records will be maintained for one (1) year beyond the last date of employment of each employee.

Availability of Records:

Upon request, the Safety Program Administrator will make any exposure records required by 29 CFR 1910.1025, Lead, available for examination and copying to affected employees, former employees, designated representatives, and the Assistant Secretary, in accordance with 29 CFR 1910.1020(a) through (e) and (g) through (i).

Upon request, the Safety Program Administrator, will make employee medical records required by 1910.1025/1926.62, Lead, available for examination and copying to the subject employee, anyone having the specific written consent of the subject employee, and the Assistant Secretary, in accordance with 29 CFR 1910.1020.

Transfer of Medical Records:

Should we cease to do business, our successor shall receive and retain all the above medical records.

Should we cease to do business and there is no successor to receive and retain the above medical records, they shall be transmitted to the Director.

At the expiration of the retention period for the above medical records, the Safety Program Administrator will notify the Director at least 3 months prior to the disposal of such records and shall transmit those records to the Director if he requests them within that period.

Training:

All lead abatement workers must be trained in the hazards of lead abatement and proper methods to use during

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lead abatement projects. Training for each employee with potential lead exposure will be provided prior to initial work assignment and at least annually thereafter.

Specifically, for all affected workers, mandatory training includes:

- A knowledge of the appropriate lead standard [11910.125; 1926.62; T8 CCR 1531.1] available above.
 - o All affected employees will be informed of the contents of Appendix A, of the appropriate lead standard, Substance DataSheet for Occupational Exposure to Lead available above
 - o All affected employees will be informed of the contents of Appendix B, of the appropriate lead standard, Employee StandardsSummary available above. This vital appendix provides, in plain language, the provisions of the lead standards with which the employees must be familiar.
- The specific nature of the operations which could result in exposure to lead above the action level.
- The purpose, proper selection, fitting, use, & limitations of respirators.
- The purpose and a description of our Medical Surveillance Program; the Medical Removal Protection Program including information concerning the adverse health effects associated with excessive exposure to lead (with particular attention to the adverse reproductive effects on both males and females and hazards to the fetus and additional precautions for employees who are pregnant).
- The engineering controls and work practices associated with the job assignments including training in good work practices.
- The contents of our Lead Abatement Program.
- Instruction that chelating agents should not be routinely used to remove lead from their bodies and should not be used at all except under the direction of a physician.
- All employees are instructed to their right of access to records under 29 CFR 1910.20.

CERTIFICATE OF WORKER'S ACKNOWLEDGMENT

Note: All personnel who work with lead in any capacity are required to read, understand, and sign this statement.

WORKING WITH LEAD CAN BE DANGEROUS. BLOOD LEAD LEVELS OVER 40 µg/dl MAY HAVE ADVERSE HEALTH EFFECTS TO THE REPRODUCTIVE SYSTEM (AND FETUS) AS WELL AS ENZYME INHIBITIONS CAUSING SERIOUS HEALTH RISK. LEAD CAN HAVE A DEVASTATING EFFECT ON THE NEUROLOGICAL SYSTEMS WITH EFFECTS RANGING FROM IRRITABILITY AND HEADACHES TO CONVULSIONS, COMA AND DEATH. LEAD ADVERSELY AFFECTS THE GASTROINTESTINAL SYSTEM, RENAL TOXICITY, AND KIDNEY FAILURE. TAKEN IN LARGE DOSES, LEAD CAN KILL WITHIN A MATTER OF DAYS. **APPENDIX A TO 29 CFR 1910.1025/1926.62** PROVIDES EXPANDED HEALTH HAZARD DATA ON LEAD.

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The contract for lead abatement on all projects requires that:

- You be trained, at no cost to you, in safe work practices both in procedure and in use of equipment utilized on lead abatement projects.
- You receive, at no cost to you, medical examinations, blood tests, and other medical tests as required to determine your fitness for leadwork.
- You will receive, at **no cost** to you, PPE including disposable suits, boot covers, gloves, hard hats, respirators, vented goggles. All maintenance costs associated with PPE, including cleaning and disposal, will be at no cost to you.

By signing this certificate, you are assuring the party for whom you are working that you have been provided the above services.

Note: Your signature below is an affirmation of the three (3) paragraphs listed below.

- RESPIRATORY PROTECTION: I have been trained in the proper use of respirators and I have been informed of the type or types of respirators to be used on various lead abatement projects. I have a copy of the Respirator Training Certificate and the Respirator Test Summary (Fit Test) covering the respirator(s) used by me on lead abatement projects.
 - Note:** Company will provide appropriate respirators. Employees will be provided with:
 - Full face-piece respirators instead of half mask respirators for protection against lead aerosols that cause eye or skin irritation at the use concentrations.
 - HEPA filters for powered and non-powered air-purifying respirators.
 - Powered air-purifying respirator (PAPR) instead of a negative pressure respirator when an employee chooses to use a PAPR and it provides adequate protection to the employee.
- TRAINING COURSE: I have been trained in the dangers inherent in handling lead and lead dust, and in proper work procedures. I have also been trained in personal and area protective measures.
 - The topics covered in the course of study included the following:
 - Physical characteristics of lead.
 - Health hazards associated with lead.
 - Respiratory protection and use of protective equipment.
 - Negative air systems.
 - Work practices.
 - Personal decontamination procedures.
 - Both personal and area air monitoring.
 - Hazard communication.

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- MEDICAL EXAMINATION: I have had a medical examination and blood level test indicating a blood level below 40µg/dl within the past 12 months which was provided at no cost to me. I have been informed of the existence, location, and availability of these records.

DATE: _____

WORKER'S SIGNATURE: _____ SSN: _____

WITNESS'S SIGNATURE: _____

Lead Air, Wipe, and Waste Sampling Plans:

Note: Accurate and timely air, wipe, and waste sampling results are critical to employee safety. Below are our air, wipe, and waste sampling strategies.

Air Sampling Plan

Note: For all lead abatement projects, we assume the lead levels will exceed the minimum requirement (exposure to lead levels above the action level, without regard to the use of respirators, to an airborne concentration of lead of 30µg/m³) at which point air sampling will be required.

BACKGROUND AIR SAMPLING: Background air samples having a volume of not less than 400 liters to a maximum of 1200 liters at a flow rate of 1 to 4 liters per minute.

AMBIENT AIR SAMPLING: Ambient air samples will be collected daily for those projects utilizing the enclosure method of removal. All ambient air samples will have a volume of not less than 400 liters to a maximum of 1200 liters at a flow rate of 1 to 4 liters per minute. Sampling locations for ambient air samples include both inside and outside the enclosure system.

Routine air sampling outside the enclosed work area may be accomplished by AFD exhaust testing.

All air sampling will be accomplished by a person experienced, trained, and tested in current air sampling techniques (especially NIOSH Method 7082 procedures) and in the operation, calibration, and maintenance of air sampling equipment.

REPRESENTATIVE PERSONAL AIR SAMPLING: Representative personal air sampling will be provided on all lead abatement projects regardless of the magnitude of duration. At least one personal sample for each shift for each job classification in each work area will be taken. For those projects requiring the enclosure method of removal, an eight (8) hour time weighted average will be obtained for each job being performed inside the enclosure. Full shift samples [representative of the employee's regular daily exposure to lead] will be taken which means at least 7 continuous hours of monitoring.

Note: If the initial monitoring reveals employee exposure to be below the action level the measurements need not be repeated unless there is a change which would result in

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additional exposure to lead.

If the initial determination or subsequent monitoring reveals employee exposure to be at or above the action level but below the permissible exposure limit, we will repeat monitoring at least every 6 months. We will continue monitoring until at least two consecutive measurements, taken at least 7 days apart, are below the action level at which time we will discontinue monitoring for that employee unless there is a change which would result in additional exposure to lead.

If the initial monitoring reveals that employee exposure is above the permissible exposure limit we will repeat monitoring quarterly. We will continue monitoring at the required frequency until at least two consecutive measurements, taken at least 7 days apart, are below the PEL but at or above the action level at which time we will repeat monitoring for that employee at the frequency every six months unless there is a change which would result in additional exposure to lead.

Affected employees shall be notified of the results of any monitoring performed within 15 working days, either individually in writing or by posting the results in an appropriate location that is accessible to affected employees. Whenever the results indicate that the representative employee exposure, without regard to respirators, exceeds the permissible exposure limit, in the written notice shall be included a statement that the permissible exposure limit was exceeded and a description of the corrective action taken or to be taken to reduce exposure to or below the permissible exposure limit.

CLEARANCE SAMPLING: Clearance sampling will be conducted following the completion of the removal of lead, lead dust, and lead containing materials for projects utilizing the enclosure method of removal. Final clearance will not be given to an enclosure until airborne concentrations of lead fall below the action level.

All Air Sampling Plans are subject to review and additional sampling maybe required.

Wipe Sampling

PRE-ABATEMENT: Before an abatement project, wipe sampling may be conducted in accordance with NIOSH Method 7082.

CLEARANCE SAMPLING: Three wipe samples, generally using

non-alcohol wipes over a 1 square foot area, will be taken for each project area.

Waste Sampling

Waste sampling will be performed as required by Disposal Site Guidelines and all applicable rules and regulations.

Respiratory Protection for Lead:

The best respiratory protection one can have is clean, breathable air. Engineering controls are our first line of defense against contaminated or oxygen deficient air. These controls include, but are not limited to, using measures such as enclosure or confinement to keep atmospheric hazards away from employees, general or local ventilation to exhaust hazardous atmospheres, and/or substitution of less toxic materials to avoid hazardous atmospheres in the first place. When effective engineering controls are not feasible, or during the time frame they are being instituted, appropriate respirators will be used.

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The PEL for lead is 50 μm^3 of air. No employee should be exposed to lead concentrations greater than 50 μm^3 of air averaged over an 8-hour period.

Where any employee is exposed to lead above the PEL for more than 30 days per year, engineering, administrative, and work practice controls will be implemented to reduce and maintain employee exposure to lead in accordance with the implementation schedule in Table I, 29 CFR 1910.1025(e), i.e., 50 μm^3 . If this goal is infeasible, exposure will be reduced to the lowest possible level.

Note: With the use of appropriate respirators and other PPE, there is no actual employee personal exposure.

Note: In the event that an operation in which lead is emitted, a program will be created that identifies

- the machinery used, material processed, controls in place, crews' size, employee job responsibilities, operation procedures and maintenance practices.
- a description of the specific mean that will be employed to achieve compliance including engineering plans and studies used to determine methods selected for controlling exposure to lead.
- a report of the technology considered in meeting the permissible exposure limit.
- air monitoring data which documents the source of the lead emissions.
- a detailed schedule for implementation of the program.
- a work practice program.
- an administrative control schedule.
- other relevant

information. **Respirator**

Selection:

No employee will be exposed to lead at concentration levels greater than 50 μm^3 averaged over an 8-hour time period.

Respirators will be selected on the basis of hazards to which the employee will be exposed. All respirators will be NIOSH approved.

Work area surveillance will be made by the Program Administrator taking into consideration the actual work area conditions, the degree of exposure and employee stress.

Respirator selection will take into consideration the air quality; the contaminant; the amount of the contaminant; the time exposure to that contaminant; and the work area surveillance.

In oxygen-deficient atmospheres as well as atmospheres in which the respiratory hazard exposure cannot be determined (Immediately Dangerous to Life or Health atmospheres), one of the below respirators will be used:

- A full facepiece pressure demand SCBA certified by NIOSH for a minimum service life of thirty minutes, or
- A combination full facepiece pressure demand supplied-air respirator (SAR) with auxiliary self-contained air supply.

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Note: Respirators provided only for escape from IDLH atmospheres shall be NIOSH-certified for escape from the atmosphere in which they will be used.

Generally, but not always, atmospheres work areas that require respiratory protection are not IDLH and in these cases respirator selection offers more options. The respirator selected will be adequate to protect the health of the employee and ensure compliance with all other OSHA statutory and regulatory requirements under routine and reasonably foreseeable emergency situations. Of course, the respirator selected will be appropriate for the chemical state and physical form of the contaminant.

For protection against gases and vapors, the respirator provided will be:

- atmosphere-supplying.
- air-purifying, provided that:
 - o it is equipped with an end-of-service-life indicator (ESLI) certified by NIOSH for the contaminant; or
 - o if there is no ESLI appropriate for conditions in respiratory hazard area, a change schedule for canisters and cartridges will be used that is based on objective data that will ensure that canisters and cartridges are changed before the end of their service life.

The Program Administrator will rely on past experience and cartridge manufacturer recommendations. If the competent person on site or any respirator user notices that breathing becomes more strained, the change schedule will be modified.

For protection against particulates, the respirator provided will be:

- atmosphere-supplying; or
- air-purifying equipped with a filter certified by NIOSH under 30 CFR part 11 like a HEPA filter; or
- air-purifying equipped with a filter certified for particulates by NIOSH under 42 CFR part 84; or

Note: These respirators and filters, other than PAPR's are identified on the packaging with numbers that take the form: TC-84A-XXX.

- Filters will have an "N", "R", or "P" designation followed by "100", "99" or "95". Examples:
 - N100 or R99
 - o "N" indicates the filter is for any solid or non-oil containing particulate contaminant.
 - o "R" indicates the filter is for any particulate contaminant.
 - o If used for an oil containing particulate, a one shift use limit applies.
 - o "P" indicates the filter may be used with any particulate contaminant.
- The number indicates the filter efficiency -- the higher the number, the more efficient. 100 = 99.97% efficiency; 99 = 99% efficiency; and 95 = 95% efficiency.

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- Air-purifying equipped with any filter certified for particulates by NIOSH for contaminants consisting primarily of particles with mass median aerodynamic diameters (MMAD) of at least 2 micrometers.

Often, the permissible exposure limit (PEL) and suggested respirator is listed on an SDS. Published exposure limits for the contaminant at hand will assist in determining respirator selection.

The Program Administrator will select respirators based on:

- the nature of the hazardous operation or process.
- the type of respiratory hazard including permissible exposure limits.
- the period of time for which respiratory protection must be worn.
- the activities of workers in the hazardous area.
- the respirator's characteristics, capabilities, and limitations.

Airborne Concentration of Lead or Condition of Use

Required Respirator

Not in excess of 0.5 mg/m³ (10X PEL) Not in

Half mask, air purifying respirator equipped with high efficiency filters. ² ³

excess of 2.5 mg/m³ (50X PEL)

Full facepiece, air purifying respirator with high efficiency filters. ³

Not in excess of 50 mg/m³ (1000X PEL)

(1) Any powered, air purifying respirator with high efficiency filters ³ or

(2) Half-mask supplied air respirator operated in positive pressure mode.

Not in excess of 1000 mg/m³ (2000X PEL)

Supplied-air respirators with full facepiece, hood, helmet, or suit operated in positive pressure mode.

Greater than 100 mg/m³, unknown concentration or fire fighting

Full facepiece, self-contained breathing apparatus operated in positive pressure mode.

Half mask, air purifying respirator equipped with high efficiency filters. ² ³ Full

facepiece, air purifying respirator with high efficiency filters. ³

○ Any powered, air purifying respirator with high efficiency filters ³ or

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- Half-mask supplied air respirator operated in positive pressure mode.

Supplied-air respirators with full facepiece, hood, helmet, or suit operated in positive pressure mode. Full

facepiece, self-contained breathing apparatus operated in positive pressure mode.

Respirators specified for high concentrations can be used at lower concentrations.

- Full facepiece is required if the lead aerosols cause eye or skin irritation at the use concentrations.
- A high efficiency particulate filter means 99.97 percent efficient against 0.3-micron size particles.

Written Site Specific Compliance Program:

This program has been developed and implemented to reduce lead exposures to or below the permissible limits. Everything preceding this program, pages 1 through 8, above, are incorporated into this program.

This Written Site Specific Compliance Program will be reviewed and updated annually.

Note: Below listed are our standard operating procedures. Should this project required specific methods or procedures due to contract specifications, special conditions, or local law (which do not conflict with OSHA/EPA standards), those changes will be incorporated into this document.

Lead abatement procedures will include, at a minimum, the steps noted below. Often, more stringent procedures are employed due to conditions encountered on specific projects as well as differing job specifications and requirements.

Administrative Procedures:

As a matter of policy, we will not use administrative procedures as a means to reduce an employee's time weighted average (TWA) exposure to lead. Specifically, in the interest of our employees' health, we will not expose workers to even minimum amounts of lead exposure over short periods of time to circumvent the more stringent requirements of engineering controls.

Engineering & Work Practice Controls:

Note: Respirators must be used during:

- Periods necessary to install or implement engineering or work-practice controls.
- Work operations for which engineering, and work-practice controls are not sufficient to reduce employee exposures to or below the permissible exposure limit.
- Periods when an employee requests a respirator.

There are eight primary steps involved in the engineering and work practice controls for the lead abatement process. These steps, overseen by a Competent Person, are applicable to removal, demolition, and/or renovation projects.

1. Set up the enclosure.

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Before setting up the enclosure, all movable objects such as chairs, desks, rugs, light fixtures, etc., will be removed to prevent them from becoming contaminated with lead dust. Objects that cannot be removed from the enclosure will be covered with two (2) layers of 6 mil polyethylene sheeting that is securely taped with duct tape to form an air tight seal. A minimum of two (2) layers of 4 mil polyethylene will be placed on the walls and a minimum of two (2) layers of 6 mil polyethylene will be placed on the floors. The following warning shall be posted where exposure to lead is above the PEL in and around the regulated work area:

DANGER LEAD WORK AREA

MAY DAMAGE FERTILITY OR THE UNBORN CHILD CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEMDO NOT EAT, DRINK OR SMOKE IN THIS AREA

These signs will be illuminated or cleaned as necessary so that the legend is clearly visible.

2. Ensure the integrity of the enclosure.

The enclosure will be inspected before lead removal begins and prior to each work shift throughout the entire period work is being conducted in the enclosure. This is accomplished best by running a hand over all seams in the plastic enclosure to ensure that no seams are ripped and the tape is securely in place.

3. Control entry to and exit from the enclosure.

The competent person should ensure that all unauthorized personnel do not enter the enclosure and that all employees and other personnel who enter the enclosure have the proper protective clothing and equipment. The competent person will also ensure that all employees and other personnel who enter the enclosure use the hygiene facilities and observe the proper decontamination procedures.

4. Supervise all employee's exposure monitoring.

Air monitoring will be performed in accordance with our Air and Wipe Sampling Plan.

5. Ensure the use of protective clothing and equipment.

All costs associated with personal protective equipment will be borne by:

Respiratory equipment will be worn in accordance with our Respiratory Protection Program. Further, all employees will wear appropriate protective clothing and equipment that protects contamination of the worker and his/her garments such as, but not limited to: disposable Tyvek suits (or similar full body clothing); gloves, hats, and shoes or boots or disposable shoe coverlets; and face shields, vented goggles, or other appropriate equipment.

Containers of contaminated protective or equipment shall be labeled as follows:

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DANGER: CLOTHING AND EQUIPMENT CONTAMINATED WITH LEAD. MAY DAMAGE FERTILITY OR THE UNBORN CHILD. CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM. DO NOT EAT, DRINK OR SMOKE WHEN HANDLING. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.

6. Ensure that employees are trained in the use of engineering controls, work practices, and personal protective equipment.

Proper work practices are necessary during lead abatement, demolition, and renovation to ensure that the lead dust concentration inside the enclosure remains as low as possible. One of the most important work practices is to wet the surfaces of lead coated material before it is disturbed and throughout the removal activity.

After the lead coated material is thoroughly wetted with water and a wetting agent, it should be removed by stripping starting at the farthest point from the AFD.

After completing gross removal, all surfaces from which lead materials have been removed shall be wet washed with a solution of trisodium phosphate (1 ounce of 5 percent trisodium phosphate to each gallon of water) and HEPA vacuumed.

Bagging lead and lead contaminated waste material in two (2) 6 mil bags or drums promptly after its removal is another work practice control that is effective in reducing the airborne concentration of lead dust within the enclosure. Good housekeeping practices will be employed during lead abatement projects. Floors will be cleaned, when possible, by HEPA vacuuming or other methods which prevent the likelihood of lead becoming airborne. Dry sweeping is strictly forbidden. Wet sweeping will only be used if HEPA vacuuming is impossible. High pressure air will not be used unless it is used in conjunction with a ventilation system designed to capture the airborne dust.

7. Ensure the use of hygiene facilities and the observance of proper decontamination procedures.

A decontamination enclosure unit that consists of a shower chamber, an equipment room, and a clean room will be installed in conjunction with the enclosed work area. This unit will be used by all persons who enter the enclosure to prevent cross-contamination of work and street clothing. All employees will shower as required by paragraph (i)(3)(i), 29 CFR 1910.1025.

Within the enclosure (or any place lead is present at any measurable level), food and beverages will not be consumed, tobacco products will not be used, and cosmetics will not be applied. An **eating area** [lunch room] will be provided that are as free as practicable from lead contamination and the are readily accessible to employees.

Hygiene facilities will be available.

8. Ensure that engineering controls are functioning properly.

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The Supervisor or Foreman on all lead abatement projects shall be a Competent Person. They will assign specific job tasks to individual workers during each work shift and shall be responsible for their supervision and ensuring that all engineering controls are maintained.

All machines will be plugged into GFCI's, fitted with HEPA filtered exhausts (if applicable) and decontaminated after use.

All waste will be containerized, labeled and transported in accordance with all local, state and federal regulations.

Medical Surveillance Program:

This Medical Surveillance Program is vital to the health and safety of our lead workers. Our program is designed to comply with the requirements outlined in the Occupational Safety and Health Administration (OSHA) standard 29 CFR 1910.1025 (general industry standard for lead). All expenses incurred by the Medical Surveillance Program will be provided at no cost. Specifically, Medical Surveillance for lead exposure is covered in detail in 29 CFR 1910.1025(j) and these requirements are complied with.

Medical Surveillance is required when:

- An employee is occupationally exposed on any day to lead at or above the action level. Initial medical surveillance consists of biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels.
- An employee is or may be occupationally exposed at or above the action level for more than 30 days in any consecutive 12 months.
- An employee is required to wear a negative pressure respirator. The Medical Surveillance Program consists of:
 - A pre-placement medical examination. Furthermore, additional medical examinations and/or blood sampling are administered as required, but not less than annually. All medical examinations and procedures will be under the supervision of a licensed physician.
 - Supplying the attending physician with a copy of the appropriate standard to ensure that all the requirements of the standard are met.
 - The Report of Examination and the Medical Opinion for Respirator Wear.
 - The actual medical examination which must include, at a minimum:
 - o A thorough physical examination with particular attention to teeth, gums, hematologic, gastrointestinal, renal, cardiovascular, and neurological systems. Pulmonary status should be evaluated as respiratory protection will be utilized. A blood sample and analysis which determines:
 - Blood lead level.
 - Hemoglobin and hematocrit determinations, red cell indices, and examination of peripheral smear morphology.
 - Zinc protoporphyrin

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- Blood urea nitrogen
- Serum creatinine
- Routine urinalysis with microscopic examination
- Any laboratory or other tests relevant to lead exposure which the examining physician deems necessary by sound medical practice.

Note: If the employee uses the physician selected by us, the employee may select a second physician to review any findings, determinations, or recommendations of the initial physician and to conduct such examinations, consultations, and laboratory tests as the second physician deems necessary to facilitate this review. We will promptly notify an employee of the right to seek a second medical opinion after each occasion that an initial physician conducts a medical examination. We condition our participation in, and payment for, the multiple physician review upon the employee doing the following within 15 days of receipt of the foregoing notification, or receipt of the initial physician's written opinion, whichever is later: The employee must, within the time frame above, inform the safety program administrator that he/she intends to seek a second opinion; the employee must take the initial steps to make an appointment with the second physician.]

Timing of Medical Examinations:

Biological Monitoring: Blood lead and ZPP level sampling and analysis for lead and zinc protoporphyrin levels every 2 months for the first 6 months and every 6 months thereafter.

For each employee whose blood sampling and analysis indicates a blood lead level at or above 40µg/dl must be notified within five (5) days and must continue to have blood sampling and analysis at 2 month intervals until two (2) consecutive blood samples and analysis indicated a blood lead level below 40µg/dl.

For each employee who is removed from lead exposure due to an elevated blood lead level, during the removal period, blood sampling and analysis will be done at least once per month.

Whenever the results of a blood lead level test indicate that an employee's blood lead level exceeds 40µg/dl, the employee will be informed of the blood lead level criteria that requires temporary removal from exposure. A blood lead level of 50µg/dl requires a temporary medical removal. We will provide a second (follow-up) blood sampling test within two weeks after receiving the results of the first blood sampling indicating medical removal.

Upon receipt of a written opinion by the physician as to the worker's work capabilities and a written confirmation that the worker has been advised by the physician of the results of the examination, safety program administrator will:

- Provide the worker with a copy of the physician's opinion within 30 days of receipt.
- Maintain a copy of the medical records of the worker for a period of 30 years beyond the duration of employment.

We have determined that the more an employee is involved with the medical examination process, the more complete the results will be. It is important to understand why certain procedures are required and what the results of the procedures mean.

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The pre-employment medical examination has two major functions:

- To determine an individual's fitness for duty including the ability to work while wearing a respirator.
- To provide a set of baseline data for comparison with future medical data.

The actual medical examination will be provided by a physician who is well-versed about the hazards a lead abatement worker faces. It is important that the individual undergoing the examination be totally honest with the physician and bring to their attention any medical problems or unusual medical histories.

The pulmonary function test, also known as the spirometry test, measures the air capacity of the lungs. This is performed by determining the Forced Vital Capacity (FVC) and the Forced Expiratory Volume in one second (FEEV1). A reduction of the FVC in subsequent examinations may signify that a restrictive change is occurring in the lungs. A reduction of the FEEV1 in subsequent examinations may be a sign of respiratory obstruction or other problems involving the lungs.

Under no circumstances do we want to expose our employees to any unnecessary health risks. Our medical surveillance program is but one of many health safeguards designed to protect our workers.

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Purpose

The purpose of this procedure is to address the hazards of working around lead where employees are not involved in lead abatement processes but may potentially be exposed.

Scope

This procedure applies to Company operations where employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

MANAGERS AND SUPERVISORS

- In coordination with the EHS Manager, develop and implement annual lead awareness training.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Identify possible locations where lead in the workplace may be found.
- Inform the EHS Manager of upcoming work involving known or suspected lead-containing materials, allowing the EHS Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the lead awareness requirements.

EHS MANAGER:

- Coordinate annual lead awareness training activities.

EMPLOYEES:

- Comply with the lead awareness requirements and direct any questions or concerns to the EHS Manager.
- Attend required annual training.

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- Review material safety data sheets or consult with the supervisor to identify any container with lead- containing material.

Procedure

WRITTEN COMPLIANCE PROGRAM

A written compliance program has been developed and implemented to reduce exposures to or below the permissible limits. The Company shall establish and implement a written compliance program to reduce exposures to or below the PEL solely by means of engineering and work practice controls. Written plans shall include at least the following:

1. A description of each operation in which lead is emitted
2. A description of the specific means that will be employed to meet compliance including engineering plans
3. Technology considered in meeting the PEL
4. Air monitoring data
5. A detailed schedule for implementation
6. A work practice program
7. An administrative control schedule.

The written program must be revised and updated at least annually

PERMISSIBLE EXPOSURE LIMIT

GROOME INDUSTRIAL SERVICE GROUP shall assure no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m³) averaged over an 8-hour period.

Administrative Controls

- Administrative controls will include job rotation schedules to reduce employee PEL exposure.
- Facilities – Company shall provide decontamination, changing & hygiene facilities. Company must provide decontamination and changing facilities. Hygiene facilities should also be provided.
- Signs – provisions for signs to be posted in and around the regulated work area are to be in place. Regulated access signs will demarcate the lead exposure regulated work areas. Signs should not be removed or defaced. The signs will read as follows:

**WARNING
LEAD WORK**

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AREA
POISON
NO SMOKING OR EATING

GENERAL WORK PRACTICES

- Employees are instructed to not disturb lead containing material and must abide by any signs, labels, and assessment reports that indicate the presence of lead.
- When working on multi-contractor worksites Company employees shall be protected from exposure. If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, Company shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.
- Company must provide decontamination and changing facilities. Hygiene facilities should also be provided.
- Employees are instructed to wash their hands and face thoroughly if contact is made with lead or materials containing lead.
- Any possible contact with lead containing material must be reported immediately to the supervisor or EHS Manager.
- If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed.
- When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system.
- Whenever possible, use a wet system to reduce airborne dust.
- Whenever possible, substitute lead material with non-lead material.
- Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.
- If respirators are required, they will meet national certification requirements, be supplied at no cost to the employee and all using employees will follow the Company Respiratory Protection Program.

Training

GENERAL

Company requires Lead Awareness training for employees whose work tasks may involving contacting lead but do not dislocate the material during the performance of their duties. Lead awareness training is to be performed for employees prior to their assignment to work in areas that contain lead. Refresher training shall be given annually. Company will document the training via records that at a minimum contain the dates of training, employee names, and the name of the trainer.

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The Lead Awareness training will include at a minimum where employees may find lead containing materials such as in lead paints, leaded solders, pipes, batteries, leaded glass, circuit boards, cathode tubes, and salvage materials.

The Lead Awareness training program must include the health effects of lead and include at a minimum, the acute symptoms of lead poisoning which are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty sleeping, fatigue, moodiness, headaches, joint or muscle aches, and anemia. The program must also include at a minimum, the potential chronic health effects from long term exposure to lead such as severe damage to the blood forming, nervous, urinary, and reproductive systems.

HOUSEKEEPING

- Surfaces - All surfaces shall be maintained as free as practicable of accumulations of lead.
- Cleaning floors - Floors and other surfaces where lead accumulates may not be cleaned by the use of compressed air.
- Vacuuming - Where vacuuming methods are selected, the vacuums shall be used and emptied in a manner which minimizes the reentry of lead into the workplace.
- Shoveling, dry or wet sweeping and brushing may be used only where vacuuming or other equally effective methods have been tried and found not to be effective.

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Purpose

The purpose of this standard is to assure appropriate review occurs before process and structural changes are made to the Company facilities, processes, and equipment.

Scope

This document is applicable to all employees.

General Requirements

- Prior to any change within the scope of this policy, a safety review is to be completed using the form Management of Change Procedure Form.
- It is the responsibility of the individual or team proposing the change to follow this procedure and complete the safety review prior to making any changes.
- At the completion of the change, the Project Manager and EHS Manager shall audit the changes against the approved plan.

Procedure

The Management of Change Process will be used when one of the following changes occurs:

- Organization Personnel Processes
- Procedures Equipment Materials
- Laws or regulations that affect work activities

When there is an organizational change in the Company supervisory personnel, the Management of Change (MOC) procedure must be followed except in routine personnel absences and replacements, shift, and normal rotations.

Environmental and safety considerations must be included when considering potential changes. The Company must consider environmental and safety considerations when contemplating potential changes and that such is part of the Management of Change (MOC) process.

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The Company Management of Change (MOC) procedures are to be utilized for revisions and changes in operating procedures, safe work practices, and training programs. The Company will consult affected employees prior to making proposed changes.

Communication Process

A formal communication process for consulting with and informing affected employees must be in place for proposed changes and consequences of change to appropriate personnel.

Describe in detail all proposed changes to the following areas on the Management of Change Procedure Form. Examples include:

Utility and Energy Requirements: electrical, hydraulic, compressed air, steam, etc., piping pressures and sizes for liquid and gas supplies, all means for de-energizing utilities provided and identified.

Hazardous Materials: names and descriptions, SDSs, concentrations, size and type of packaging, flash point, flammable limits, storage requirements, temperatures, etc.

Waste Disposal: waste generated, containers to be used and locations, amounts, flammability, toxicity, reactivity, ingredients, associated wastes such as gloves and rags, disposal locations, etc.

Personal Protective Equipment: types required for hazards present or anticipated.

Personnel: types of training required for hazard communication, waste disposal, PPE, work permits, confined space, moving vehicles, cranes, fire protection, lockout/tagout, new equipment, shifts to be involved, use of temporary employees, qualifications of operators, testing of operators.

Material Handling: lifting devices required, cranes required, weights to be handled mechanically and manually, forklift requirements, rack storage requirements, access to racks by forklifts, power requirements for lifting aids.

Fire Protection: access to existing fire extinguishers and fire hoses, sprinklers protected and not obstructed, emergency response procedures.

Walking Surfaces: Access to aisles, aisles not used for working, aisles designated, clean and smooth surfaces, floor mats, trip hazards.

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Machinery and Equipment: guarding requirements, power transmission guarding, nip points, sharp edges, foot treadles, energy sources, new equipment and tools, maintenance requirements, equipment bolted to the floor, energy isolating requirements (lockout/tagout), special tools required, automatic start or intermittent operations.

Ergonomics: illumination, noise, worker position and posture, vibration, floor space, machine controls, repetition, force, tool use, heat and cold, emergency stop location.

Ventilation: airborne contaminants (vapor, gas, dusts, fumes, mists, smoke, vehicle exhaust, etc.), control, methods, amounts of emissions, local and general (dilution) ventilation, CFM, permits required.

Radiation Sources: ultra-violet radiation from arc welding, laser, light energy from cutting, plasma, microwave, radio frequency, etc.

Training

Employees that are affected by operational changes must be trained and informed prior to the startup of operations. Employees must be educated to understand the benefits of managing change, the value of a Management of Change (MOC) program for protecting personnel safety, the integrity of the facility, and the environment.

Form

Purpose of Form: To verify the orderly and comprehensive review of any new operations, processes, construction, equipment, machinery, demolition, remodeling, etc. prior to the actual change taking place. We must make sure

that changes to the way we perform work do not create safety nor environmental hazards and that we have considered how changes in one area of work will affect other areas. The Management of Change Process will be used when one of the following changes occurs:

- Organization
- Personnel
- Processes
- Procedures
- Equipment

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- Materials
- Laws or regulations that affect work activities
- Also consider any of the areas on the form

MANAGEMENT OF CHANGE (MOC) FORM		
Project Location:	Requestor Name:	
Change Date:	Time:	
Impact of Change:		
Technical Basis for Change:		
Utility and Energy Requirements: routing and type of electrical, hydraulic, compressed air, steam, etc., piping pressures and sizes for liquid and gas supplies, all means for de-energizing utilities provided and identified, other.		
Hazardous Materials: names and descriptions, MSDSs, concentrations, size and type of packaging, flash point, flammable limits, storage requirements, temperatures, other.		
Waste Disposal: wastes generated, containers to be used and locations, amounts, drains used, flammability, toxicity, reactivity, ingredients, associated wastes such as gloves and rags, disposal locations such as compactor or strategic dumpster or hazardous waste drums, other.		
Personal Protective Equipment: types required other.		
Personnel: types of training required for hazard communication, waste disposal, PPE, confined space, moving vehicles, cranes, fire protection, lockout/tagout, new equipment, work shifts to be involved, use of temporary employees, qualifications of operators, testing of operators, other.		
Material Handling: lifting devices required, cranes required, weights to be handled mechanically and manually, forklift requirements, rack storage requirements, access to racks by forklifts, power requirements for lifting aids, other.		
Fire Protection: access to existing fire extinguishers and fire hoses, sprinklers protected and not obstructed, emergency response, other.		
Walking and Working Surfaces: access to aisles, aisles not used for working, aisles designated, clean and smooth surfaces, floor mats, trip hazards, other.		

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Machinery and Equipment: point of operation guarding, power transmission guarding, nip points, sharp edges, foot treadles, energy sources, new equipment and tools, maintenance requirements, equipment bolted to the floor, energy isolating requirements (lockout/tagout), special tools required, automatic start or intermittent operations, other.		
Ergonomics: illumination, noise, worker position and posture, vibration, floor space, machine controls, repetition, force, tool use, heat and cold, emergency stop location, other.		

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Purpose

The Company is committed to providing a safe and healthy working environment for all employees. Musculoskeletal disorders (MSD) account for a majority of reported injuries and we must minimize the risk and incidence of MSDs. To achieve this goal, The Company requires each worksite to establish and maintain an MSD, Lifting and Handling Loads Program with the following elements:

- Ongoing training of management, supervisors, and employees (including new hires) on MSD awareness hazards and control measures.
- Tracking of MSD statistics.
- MSD hazard identification and assessment (see MSD Hazard Identification Form).
- Control of MSD hazards through the application of engineering and/or administrative controls.
- Proactively integrating ergonomic principles into workplace design and work techniques.
- A realization that personal protective equipment may only be used as a substitute for engineering or administrative controls if it is used in circumstances in which those controls are not practicable.

Key Responsibilities

EHS MANAGER

Develops local Lifting and Handling Loads Programs for all worksites in accordance with this procedure and ensures all employees are aware of the requirements of the local Lifting and Handling Loads Program.

- Communicate, promote and support the MSD, Lifting and Handling Loads Program.
- Conduct MSD training sessions and/or provide MSD training materials.
- Maintain records of MSD training that they provide in a manner that supports accuracy and ease of access for monitoring purposes.
- Monitor corrective actions taken as identified on incident reports.
- Support supervisors/foremen in the Lifting and Handling Loads Program process.
- Assist in the investigation of MSD incidents to address injury hazards.
- Bring to the attention of the Company management any MSD hazards identified during their

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investigations, audits or inspections.

- Ensure distribution and awareness of MSD Hazard Identification Forms.
- Provide input into purchasing specifications for new tools, equipment and furniture as needed to reduce MSD hazards.
- Provide input into the development of safe work procedures to reduce MSD hazards.

WORKSITE MANAGER

Responsible for the implementation and maintenance of the Lifting and Handling Loads Program for their facility and ensuring all assets are made available for compliance with the procedure. He or she will also:

- Ensure that all worksite departments implement and maintain the provisions of the Lifting and Handling Loads Program.
- Seek regular reports to ensure that their worksite is in compliance with the Lifting and Handling Loads Program.
- Manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists must be provided for employees. Other engineering controls such as conveyors, lift tables, and work station design should be considered.
- Use of provided equipment by employees must be enforced.

EMPLOYEES

- Shall attend all MSD-related training for the task they are performing.
- Practice MSD prevention strategies as per MSD training.
- Comply with safe work procedures.
- Correctly use the equipment provided by the Company, according to manufacturers' recommendations.
- Report to the supervisor any unsafe acts, unsafe tasks, unsafe conditions or equipment problems that create MSD hazards.
- Report any MSD incidents to the supervisor and cooperate in the investigation process.

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Procedure

WORKSITE ASSESSMENT

Before manual lifting is performed, a hazard assessment must be completed. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if a two-man lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried. The assessment shall also include:

- Use of the MSD Hazard Identification Form contained within this procedure
- Physical Demands
 - o Neck, Back, Shoulder, Wrist
 - o Hand
 - o Knee, Ankle
 - o Feet
- Force Required and Working Distance
 - o Do employees push, pull, lift, lower, or carry objects that are too heavy or require too much force; away from the center of the body or in a jerky or twisting manner?
- Work Postures
 - o Is the back curved too much or in a stooped position?
 - o Is the back twisted during movements?
 - o Is the neck bent or twisted?
 - o Are the arms away from the body?
 - o Are the wrists flexed, extended or in pinched positions?
- Repetitive Use of Similar Muscles
 - o Do employees perform movements over and over in the same way?
- Static Muscle Use and Duration
 - o Do employees hold any of the above work postures for more than 20 seconds?
 - o Stand for long periods with their knees locked?
 - o Stand in one position without moving or stretching?
- Contact Stress
 - o Do employees put localized pressure on any part of their body?
- Work Space Layout and Conditions

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- o Are there working heights, reaches in workspace, equipment, tool design, storage conditions, etc., that cause or contribute to employees experiencing any of the physical demand risk factors?
- o Also consider seating, floor surfaces, the characteristics of objects handled, including size and shape, load condition and weight distribution, and container as well as tool and equipment handles.
- Organization of Work
 - o Are there work processes, monotonous job tasks, work recovery cycles, task variability, work rate, machine paced tasks or peak activity demands that cause or contribute to rushing, frustration, fatigue or other visible signs of stress?
- Environmental Conditions
 - o Are employees exposed to poor lighting, vibration, cold or hot air/wind/water?

Work Controls

The Company must ensure, based on the assessment, that control measures are implemented to eliminate, minimize or reduce, so far as is reasonably practicable, the risk of musculoskeletal injury to the worker.

HANDLING HEAVY OR AWKWARD LOADS

The Company will use all practicable means to adapt the heavy or awkward loads to facilitate lifting, holding or transporting by workers or to otherwise minimize the manual handling required. Those include:

- Where use of lifting equipment is impractical or not possible, two man lifts must be used.
- All loads carried on handcarts shall be secured.
- All awkward type loads shall be secured to prevent tippage.
- Additional methods include:
 - o Reducing the weight of the load by dividing it into two or more manageable loads.
 - o Increasing the weight of the load so that no worker can handle it and therefore mechanical assistance is required.
 - o Reducing the capacity of the container.
 - o Reducing the distance the load must be held away from the body by reducing the size of the packaging.
 - o Providing hand holds.
 - o Team lifts the object with two or more workers.

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- o Improve the layout of the work process to minimize the need to move materials.
- o Reorganize the work method(s) to eliminate or reduce repeated handling of the same object.
- o Rotate workers to jobs with light or no manual handling.
- o Use mobile storage racks to avoid unnecessary loading and unloading.

INCIDENTS AND INJURIES

If an employee reports symptoms of an MSI the Company will:

- Musculoskeletal injuries caused by improper lifting must be investigated and documented. Incorporation of investigation findings into work procedures must be accomplished to prevent future injuries.
- Injuries must be recorded and reported as required by 29 CFR Part 1904.

REVIEW & UPDATING LIFTING AND HANDLING LOADS PROGRAM

- Supervision must periodically evaluate work areas and employees' work techniques to assess the potential for and prevention of injuries. New operations should be evaluated to engineer out hazards before work processes are implemented.

Training

The Company shall ensure that a worker who may be exposed to the possibility of musculoskeletal injury is trained in specific measures to eliminate or reduce that possibility. Our training shall include:

- General principles of ergonomics.
- Recognition of hazards and injuries.
- Procedures for reporting hazardous conditions.
- Methods and procedures for early reporting of injuries.

Additionally, job specific training will be given on safe lifting and work practices, hazards, and controls.

MSD Hazard Identification Form

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Job Title:
Task Assignment:
Job Code (if used):
Company Location:

Location of Assessment:
Hazard Identification applies to the following locations:
Date:
Completed by (Name/Title):
In Consultation with:

Status: Draft ☐ Final ☐

1. Awkward Postures			Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Neck	Working with the neck bent forward or to the side more than 30° for more than 2 hours total per day.	 Side ☐  Forward ☐	☐			☐ Date: _____
Neck	Working with the neck rotated more than 45° in either direction for more than 4 hours total per day or working with the neck bent back /up more than 10° for more than 2 hours total per day		☐			☐ Date: _____
Neck	Working with the elbow(s) at or above the shoulder for more than 2 hours total per day		☐			☐ Date: _____

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1. Awkward Postures			Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Shoulder	Working while sitting or standing with the back bent forward, sideways, or twisted more than 30° for more than 2 hours total per day	 Side ☐  Twisted ☐  Forward ☐	☐			☐ Date: _____
Back	Working while sitting or standing with the back bent back more than 10°, and with no support for the back, for more than 2 hours total per day	 Backward	☐			☐ Date: _____
Knees	Employee squats/ kneels for more than 2 hours total per day	 Kneel	☐			☐ Date: _____

2. Static Whole Body Postures		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Prolonged Sitting	Employee sits for more than 6 hours total per day	☐			☐ Date: _____
Prolonged Standing	Employee stands on hard surface more than 4 hours total per day (standing in one location without taking > 2 steps in any direction)	☐			☐ Date: _____

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3a. Lift/Lower Forces (manual labor)		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/ Shoulder	Lift/lower objects up to 2 times an hour Object close to the body: 35 lb or more Object away from the body: 17 lb or more	☐			☐ Date: _____
	Lift/lower objects 3 to 60 times an hour Object close to the body: 30 lb or more Object away from the body: 15 lb or more	☐			☐ Date: _____
	Lift/lower objects 61 to 240 times an hour Object close to the body: 25 lb or more Object away from the body: 15 lb or more	☐			☐ Date: _____
	Lift/lower objects >5 lb more than 240 times an hour (more than 4 times a minute)	☐			☐ Date: _____

3b. Lift/Lower Forces (office work)		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/ Shoulder	Lift/lower objects up to 2 times an hour - Object close to the body: 30 lb or more - Object away from the body: 15 lb or more	☐			☐ Date: _____
	Lift/lower objects 3 to 60 times an hour - Object close to the body: 25 lb or more - Object away from the body: 15 lb or more	☐			☐ Date: _____
	Lift/lower objects 61 to 240 times an hour - Object close to the body: 25 lb or more - Object away from the body: 10 lb or more	☐			☐ Date: _____

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	Lift/lower objects >5 lb more than 240 times an hour (more than 4 times a minute)	☐			☐ Date: _____

4a. Push/Pull Forces (manual labor) (Carts, trolleys, rolls, cables, etc.) <i>NOTE: Push/Pull force is the force required to move the object, not the weight of the object itself.</i>		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/ Shoulder	Pushing/pulling up to 2 times an hour with initial push/pull force of more than 50 lb	☐			☐ Date: _____
	Pushing/pulling 3 to 120 times an hour, with initial push/pull force of more than 25 lb	☐			☐ Date: _____
	Pushing/pulling forces >5 lb more than 120 times an hour (more than twice a minute)	☐			☐ Date: _____
4b. Push/Pull Forces (office work) (Carts, trolleys, rolls, cables, etc.) <i>NOTE: Push/Pull force is the force required to move the object, not the weight of the object itself.</i>		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/ Shoulder	Pushing/pulling up to 2 times an hour with initial push/pull force of more than 50 lb	☐			☐ Date: _____
	Pushing/pulling 3 to 120 times an hour , with initial push/pull force of more than 25 lb	☐			☐ Date: _____
	Pushing/pulling forces >5 lb more than 120 times an hour (more than twice a minute)	☐			☐ Date: _____

5. Repetition	Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved

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Neck, shoulders, elbows, wrists or hands	Employee repeats the same motion with the neck, shoulders, elbows, wrists, or hands every few seconds with little or no variation for more than 2 hours total per day excluding computer use. Check body part(s) that apply: ☐ Neck ☐ Shoulder(s) ☐ Elbow(s) ☐ Wrist(s) ☐ Hand(s)	☐			☐ Date: _____
Computer Use	Employee uses computer more than 3 hours total per day	☐			☐ Date: _____

6. Hand/Arm Vibration		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Hands Arms	Use high vibration tools (impact wrenches, chain saws, jack hammers, riveting hammers) for more than 30 minutes total per day	☐			☐ Date: _____
	Use moderate vibration hand tools (grinders, sanders, jig saws) that typically have moderate vibration levels more than 2 hours total per day	☐			☐ Date: _____

7. Repeated Impacts		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Hands Knees	Employee uses one of the following as a hammer more than 10 times per hour and for more than 2 hours total per day. (Check the body part(s) that apply) ☐ Hand (heel/base of palm), or ☐ Knee	☐			☐ Date: _____

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COMPLETE THIS SECTION ONLY IF POTENTIAL HAZARDS HAVE BEEN IDENTIFIED IN THE "MARK IF REQUIRED" COLUMN:

1. How many employees are exposed to the hazards identified above and how often?

	# of employees Exposed	How often? (describe in hours per day or week, as appropriate)
Awkward postures		
Static whole body postures		
Lift/lower forces		
Push/pull forces		
Repetition		
Hand/arm vibration		
Repeated impacts		

2. In the past two years, how many MSD incidents been reported among employees who are exposed to the identified hazards? State the number of incidents and their nature (e.g., Lost Time, Medical Aid, First Aid, Incident only)

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Purpose

The purpose of this program is to set forth procedures for safe work being performed near energized lines by Company employees.

Scope

This program applies to all Company employees, temporary employees, and contractors. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Requirements

MINIMUM APPROACH DISTANCES

Mechanical equipment is operated so the minimum approach distances established by the Company, are maintained from exposed energized lines and equipment, unless operated by a qualified employee. OSHA's definition of a Qualified Person is one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.

Mechanical equipment shall be operated so that the minimum approach distances established by the Company under paragraph (l)(3)(i) of 1910.269 are maintained from exposed energized lines and equipment. However, the insulated portion of an aerial lift operated by a qualified employee in the lift is exempt from this requirement.

PROTECTION FROM HAZARDS

Employees will be protected from hazards that might arise from equipment contact with the energized lines. Each employee shall be protected from hazards that might arise from equipment contact with the energized lines. The measures used shall ensure that employees will not be exposed to hazardous differences in potential.

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MECHANICAL EQUIPMENT LOAD LIMITS

Mechanical equipment load limits/ratings are adhered to. "Applied loads." Mechanical equipment used to lift or move lines or other material shall be used within its maximum load rating and other design limitations for the conditions under which the work is being performed.

INSULATING MATERIAL

The energized line(s) shall be covered with insulating material that will withstand the type of contact that might be made during the operation. The energized lines exposed to contact shall be covered with insulating protective material that will withstand the type of contact that might be made during the operation.

SHIFT INSPECTIONS

Critical components of mechanical elevating and rotating equipment are inspected prior to use on each shift. The critical safety components of mechanical elevating and rotating equipment shall receive a thorough visual inspection before use on each shift. Note: Critical safety components of mechanical elevating and rotating equipment are components whose failure would result in a free fall or free rotation of the boom.

OBSTRUCTED VIEWS

Vehicles with obstructed views to the rear have a spotter or reverse signal alarm audible above the surrounding noise level. No motor vehicle or earthmoving or compacting equipment having an obstructed view to the rear may be operated on off-highway jobsites where any employee is exposed to the hazards created by the moving vehicle, unless:

- The vehicle has a reverse signal alarm audible above the surrounding noise level, or
- The vehicle is backed up only when a designated employee signals that it is safe to do so.

DESIGNED SPOTTER

A designated employee (spotter) shall observe the approach distances and provide timely warning to the operator if approach distances are compromised. A designated employee other than the equipment operator shall observe the approach distance to exposed lines and equipment and give timely warnings before the minimum approach distance required by paragraph (p)(4)(i) of CFR 1910.269 is reached, unless the Company can demonstrate that the operator can accurately determine that the minimum approach distance is being maintained.

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			Revision Date:	8/01/2024
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Training

- Employees will receive training on the contents of this procedure before performing any work on or near energized lines.

Training shall be documented and retained in the worker's training file

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Purpose

The purpose of this program is to define the requirements for safely operating a mobile elevating work platform (MEWP).

Scope

This policy shall cover all MEWPs used on company property and customer sites. All employees shall operate these devices in accordance with this policy.

Definitions

MEWP – a mobile elevating work platform (MEWP) is a machine/device intended for moving persons, tools and material to working positions, consisting of at least a work platform with controls, an extending structure and a chassis. Globally, MEWP is the term most commonly used to refer to these machines, but they are referred to by many other names, including aerial (or access) platforms, aerial work platforms (AWP), cherry pickers, elevating work platforms (EWP) and lift platforms. There are several different classifications of MEWPs available to get work done at height, including boom lifts (articulating, straight or telescopic, crawler, electric &

hybrid and towable), low-level access lifts, scissor lifts, stock pickers (also known as order pickers) and vertical lifts.

It is important to know that telehandlers are not considered a MEWP; they are classified by OSHA as a Class 7 rough-terrain forklift.

Key Responsibilities

SUPERVISORS

- Shall ensure the employees comply with all provisions of this program.

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- Shall ensure that employees receive training appropriate to their assigned tasks.
- Shall ensure that all MEWPs are properly operated by trained and certified personnel.
- Shall take prompt corrective action when unsafe conditions or practices are observed.
- Shall ensure that MEWPs are designed and constructed in conformance with applicable requirements of the American National Standards for "Vehicle Mounted Elevating and Rotating Work Platforms" ANSI A92.2-1969, including appendix.

EMPLOYEES

- Shall follow all aspects of this program, including the use of appropriate personal protective equipment.
- Attend all the training required by this program.
- Immediately report any unsafe conditions or concerns related to MEWP to their supervisor.

Procedure

GENERAL REQUIREMENTS

- Operators shall review and follow the manufacturer's operating manual. A copy of the manual is usually located around the operator's cabin in a weatherproof folder on the equipment.
- Only certified operators shall operate a MEWP.
- Operators shall follow safe work practices when operating a MEWP.
- A thorough mechanical and operational inspection must be performed and documented on each MEWP annually by a third-party contract in accordance with manufacturer's specifications. A MEWP that has not met the annual inspection requirements must be removed from service until requirements are met.

PRE-USE INSPECTION

- Every MEWP must undergo a pre-use inspection prior to use on each shift. See Appendix A of this procedure for an example of the Company's MEWP Inspection form.

The pre-use inspection will identify conditions that could affect the safe use of the MEWP. If any unsafe conditions exist, the MEWP shall be removed from service. In order to remove an MEWP from service, the operator shall remove the keys and place an "Out of Service" tag near the operator control panel.

- Operators must immediately report any unsafe MEWP conditions to their supervisor.

GENERAL SAFE WORK PRACTICES

- Before the machine is started, the operator must walk completely around the machine to ensure everyone and everything is clear of the machine.
- Consideration shall be given to the amount of wind. Follow the manufacturer's instruction regarding operation in windy conditions. As a general rule, MEWPs shall not be operated in winds exceeding 25mph although this can vary depending on the model of equipment.

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- MEWPs with noted, reported deficiencies shall not be operated until repairs are made and equipment is authorized for use.
- Operators shall not wear any loose clothing or any accessory that can catch in moving parts.
- MEWPs may be "field modified" for uses other than those intended by the manufacturer provided the modification has been certified in writing by the manufacturer or by an equivalent entity.
- Lift controls shall be tested each day prior to use to determine that such controls are in safe working condition. Tests shall be made at the beginning of each shift during which the equipment is to be used to determine that the brakes and operating systems are in proper working condition.
- Before moving a MEWP for travel, the boom(s) shall be inspected to see that it is properly cradled, and outriggers are in stowed position.
- Boom and basket load limits specified by the manufacturer shall not be exceeded.
- MEWPs shall have a working back-up alarm audible above the surrounding noise level or the vehicle is backed up only when an observer (spotter) signals that it is safe to do so.
- The minimum clearance between electrical lines and any part of the equipment (i.e. crane or load) shall be 10 feet for lines rated 50 kV or below.
- When working near cranes, the MEWP operator shall coordinate their work activities directly with the crane operator.
- Employees shall always stand firmly on the floor of the basket and shall not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position.
- Approved personal fall arrest systems shall be worn and the lanyard attached to the boom or basket when working from a MEWP.
- 100% tie-off will be maintained while transferring to and from a MEWP at heights. Tie-off will only be made to secure, stable and rated anchorage points. Operators will follow the guidance of the equipment manufacturer for this task.
- The brakes shall be set and outriggers, when used, shall be positioned on pads or a solid surface.
- Wheel chocks shall be installed before using a MEWP on an incline.
- The insulated portion of an MEWP shall not be altered in any manner that might reduce its insulating value.
- Never field modify an MEWP for uses other than those intended by the manufacturer.

TRAINING REQUIREMENTS

- All employees who operate a MEWP shall be trained in the safe operation of the specific device they will operate. Training must conform to all OSHA requirements.
- Only trained and authorized personnel are allowed to operate MEWPs.
- Employees who are authorized to operate MEWPs must receive training prior to engaging in their duties, and at least every four (4) years thereafter. The training is to ensure that the MEWP Safety Program is understood. The Field manager will also ensure that authorized MEWP operators have acquired the necessary practical skills required for safe operation.
- Training can be offered to employee operators by the MEWP rental Company or by a qualified

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instructor from within the Company who has completed a train-the-trainer program such as from JLG Industries or United Rental and whose trainer certificate is unexpired and in good standing with the training organization.

- Training will consist of classroom instruction, hands-on training and hands-on evaluation.
- Training will be specific to the type of MEWP being used.

RETRAINING

Refresher training in relevant topics will be provided to an MEWP operator when any of the following occur:

- The operator has been observed to be using the MEWP in an unsafe manner.
- The operator has been involved in an accident or a near-miss incident.
- The operator has received an evaluation that reveals the operator is not using the MEWP safely.
- The operator is assigned to operate a different type of equipment.
- A condition in the workplace changes in a manner that could affect safe operation of the equipment.

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				Next Revision Date:	8/01/2025
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Scope

This policy is applicable to all Company employees and subcontractors. If subcontractors are used, they are required to comply with this policy and testing requirements. The Company will also validate that the employees of the subcontractor have been tested to meet our client's requirements.

Policy

The use, bringing onto company property or job site, possession, concealment, transportation, promotion or sale of the following substances by any employee is prohibited.

- Illegal drugs, unauthorized controlled substances, look-a-likes, designer, synthetic or any other drug which may affect an employee's motor functions or alter a person's perception working
- Prescription drugs/over the counter medication except under the following conditions:
 - o The employee shall inform his supervisor prior to using any prescription drug or over the counter medication and receive written permission to possess such drug while working on the job.
 - o The prescription vial shall be labeled by the dispensing pharmacy and the label shall show the employee's name, physician, prescription number, date the prescription was filled and the dosage rate.
 - o The over-the-counter medication will be in its original package or container.
- Alcoholic beverages

Drug-Free Workplace Policy:

Because the type of work we perform can result in serious injury if employees are not capable of focusing not only on their job task, but their surroundings, and others with whom they work, it is our policy to hire only persons free from any evidence of illegal use of controlled substances or other drugs including alcohol.

Note: OSHA has determined that drug testing after injuries or illnesses that occur at the workplace can be considered retaliatory or discriminatory, and thus discourage employees from properly reporting the injury or illness. This can be the case in situations where the injury or illness wouldn't have been reasonably expected to be the result of being under the influence of drugs or alcohol.

Example: A bee sting that results in an allergic reaction and leads to a stay at the hospital. There is not a reasonable belief that a bee sting would be caused by impairment and thus drug testing would be considered retaliatory or discriminatory.

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Drug Testing:

Drug testing will be performed by certified laboratories and all results will be confidential.

Any analysis of specimens utilized to evaluate whether evidence of illegal controlled substance or other drug use exists will be confidential and remain confidential.

All initial drug tests will be paid for by our company.

Failure to pass an initial drug test will not be considered conclusive evidence of drug miss-use. A second test will be administered to ensure that a false reading has not occurred.

Further, all positive tests will be reviewed by a Medical Review Officer and the employee may consult with this officer before the results are provided to us.

The United States Department of Labor, Office of the Assistant Secretary for Policy, has identified the below drugs as illicit drugs and their use by any employee as strictly prohibited and these are the drugs for which testing will be done.

Cocaine (including crack), inhalants, hallucinogens (including phencyclidine [PCP], lysergic acid diethylamide [LSD] and Ecstasy [MDMA]), heroin, or prescription-type psychotherapeutics used non-medically, which includes stimulants, sedatives, tranquilizers, and pain relievers.

When Tests Are Administered:**PRE-EMPLOYMENT/POST-OFFER TESTING**

Drug and alcohol testing will be given to all individuals prior to employment.

Testing **must** be given before initial assignment.

Refusal to participate in the drug test in the manner required, or a positive confirmed drug test result indicating the illegal use of a controlled substance or other drug will be a basis for rejecting the applicant.

NOTE: LABORATORY TESTING:

The selected laboratory will perform substance testing on blood or urine specimens in accordance with standards set forth by the National Institute for Drug Abuse. Employees may be asked by collection site personnel to indicate whether there is the potential that they will test positive for prescription or other substances. A consent form and information sheet will be provided. If the employee fails to provide an acceptable urine specimen, one of the following steps will be taken:

- The employee's stay will be extended at the designated collection site, if feasible, until an acceptable specimen can be collected.
- The test may be rescheduled due to unusual circumstances, i.e., post-operative situations.
- The employee will be disciplined up to and including termination on the first offense for failing to cooperate or refusing to provide an acceptable specimen.

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All positive urine specimen test results for employees on active status will be confirmed by standard laboratory procedures, generally gas chromatography/mass spectrometry (GC/MS), using a portion of the same specimen. In case of testing by means other than urine (i.e., breath or other samples), reliable laboratory or instrument testing procedures will be followed.

RANDOM DRUG AND ALCOHOL TESTING

Drug and alcohol testing will be administered at random times. Employees will be chosen through an unbiased selection process. These tests will be without cause, suspicion, detectable performance problems, or the occurrence of an accident, incident, or safety violation.

DRUG AND ALCOHOL TESTING POST WORK-RELATED INCIDENT

Drug and alcohol testing will be administered to employees involved in a work-related incident. Employees involved in a work-related incident where drug or alcohol use can be reasonably suspected as contributing to the accident must be tested. Employees are required to submit to these tests.

REASONABLE CAUSE DRUG AND ALCOHOL TESTING

If a **competent person** has determined that there is reasonable cause or suspicion, drawn from specific objective and articulable facts and reasonable inferences that an employee is illegally using or has illegally used a controlled substance or other drugs, then that employee will be required to submit to a drug and alcohol test.

NOTE: NON-LAB TESTING:

A visual one-step panel immunoassay for the simultaneous, qualitative detection of multiple drugs and metabolites in human urine may be used for the purpose of administering Random, Post Accident and For Cause drug screens in the field.

- In the event of a positive reading, the specimen will be sealed, and a chain of custody form will be completed, and it will be sent to a NIDA certified lab for GC/MS analysis.
- If the additional test results are positive, or if the employee fails or refuses execute the Chain of Custody forms as directed, termination will result.
- If the additional drug screen results are negative, the employee will be returned to work and compensated for time lost from the job.

Any employee who receives unacceptable drug and alcohol test results will not be allowed to work on a Client/Host site or facility.

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Training

All supervisors will receive a minimum of 2 hours training in substance abuse detection.

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			Initial Issue Date	11/04/2021
			Revision Date:	8/01/2024
PANDEMIC PREPAREDNESS			Revision No.	3
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Purpose

Business continuity means ensuring that essential business functions can survive a natural disaster, technological failure, human error, or other disruption. Many existing business continuity plans anticipate disruptions such as fires, earthquakes, and floods. These events are restricted to certain geographic areas and the time frames are fairly well defined and limited. Pandemic disease, however, demands a different set of continuity assumptions since it will be widely dispersed geographically and potentially arrives in waves that could last several months at a time.

A pandemic disease plan or disease containment plan will be developed for the company and a coordinator appointed. There will be a workplace coordinator who will be responsible for dealing with disease issues and their impact at the workplace. This may include contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals.

Assumptions

A pandemic disease will spread rapidly and easily from person to person, affecting all businesses due to absenteeism. Businesses that are relied upon by other businesses will be facing the same massive absentee rates, and will be unable to provide essential components to maintain the daily operations.

Risk assessments to identify the essential/critical components of our business operation need to be conducted. Recognize that a pandemic includes:

- Healthcare services not being available (they are already full at present with the usual ailments).
- Schools, churches and other public places not being open.
- Borders are partially or fully closed, especially airports, leaving people (our families, employees, business partners, customers and suppliers) “stranded”.
- Essential materials and supplies may be limited due to distribution chains that are affected by the travel restrictions or absentee workers supporting those transportation means.
- Essential services around utilities, food distribution/access and banking systems may not be at “normal levels”; access to cash flow could be tight.
- People may not be willing to or able to come to work.

Communications

Communications during a pandemic involves both internal communications and external communications. Internal communication will be provided to employees to educate them about pandemic diseases and measures they can take to be prepared.

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Key contacts, a chain of communications and contact numbers for employees and processes for tracking business and employees status have been developed as described in this section.

Risk communication is critical to inform employees regarding changes in the pandemic status. The following is one method for providing such information.

Alert: conveys the highest level of importance; warrants immediate action or attention.

Advisory: provides key information for a specific incident or situation; might not require immediate action. **Update:** provides updated information regarding an incident or situation; unlikely to require immediate action.

Provide continuous updates through internal & external communications when a pandemic is imminent:

- Notification to employees of operational changes
- Provide frequent updates about the pandemic status
- Provide advisories and alerts as conditions change
- Ensure vendors and suppliers have available a dedicated communications contact
- Monitor local, state, and federal pandemic updates

We will notify key contacts including both customers and suppliers in the event an outbreak has impacted our company's ability to perform services. This procedure also includes notification to customers and suppliers when operations resume.

We will use our phone systems that can perform automatic dialing from a database with each employee's contact number to send notifications and messages about alerts. The use of the company web-site also will serve as a portal for sharing information with employees and vendors.

Business Continuity Planning

During an emergency, employees look to management to provide leadership for the company. If a large percentage of personnel become ill our business continuity plans will be initiated so that if significant absenteeism or changes in business practices are required business operations can be effectively maintained.

COMMAND STAFF:

Incident Commander (President/CEO)	Organizes and directs all aspects of the incident response
Public Information Officer (Media/Public Relations)	Creates and releases upon approval from the incident commander all information to the staff, media and public
Liaison Officer (Vice President)	Establishes and maintains relationships with outside organizations

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Safety Officer (Safety Manager)	Ensures the safety of all persons involved with the pandemic

OPERATIONS SECTION:

Operations Section Chief (Director of Operations)	Initiates and manages ongoing operations throughout a pandemic

LOGISTICS SECTION:

Logistics Section Chief (Purchasing/Inventory Manager)	Meets the goods, services, and staffing needs of the operation during the pandemic

PLANNING SECTION:

Planning Section Chief	Collects information and resources potentially relevant to the

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(Lead Administrator)	pandemic and company operations

FINANCE SECTION:

Finance Section Chief (Purchasing/Accounting Manager)	Monitors all expenditures and ensures fiscal resource availability during the pandemic

Pandemic Response by Pandemic Phase

Currently the WHO (World Health Organization) has created various phases for a pandemic but does not always relate to events locally.

Level 0 (WHO Phase 3) - Novel virus alert - not human-to-human transmission

Level 1 (WHO Phase 4) - Confirmed cases of human-to-human transmission of novel disease virus. Level 2 (WHO Phase 5) - Suspected/confirmed cases in the NJ area.

Level 3 (WHO Phase 5) - Numerous suspected/confirmed cases in the NJ area.

Work At Home Considerations

There is a work-at-home and stay-at-home policy when employees are ill or are caring for others. Flexible work policies will be developed as much as possible. Employees are encouraged to stay at home when ill, when having to care for ill family members or when caring for children when schools close, without fear of reprisal. Tele- commuting or other work-at-home strategies will be developed.

Infection Control Measures

Guidelines for infection control are important to clarify the routes of transmission and the ways to interrupt transmission through measures of hygiene. Infection control is an essential component of pandemic management and a component of public health measures. Essential measures include:

- Hand washing and use of hand sanitizers shall be encouraged by Groome Industrial Service Group supervision. Hand washing facilities, hand sanitizers, tissues, no-touch trash cans, hand soap and disposable towels shall be provided by Groome Industrial Service Group.

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- Workers are encouraged to obtain appropriate immunizations to help avoid disease. Granting time off work to obtain the vaccine is considered when vaccines become available in the community.
- Social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings will be considered.
- We will clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) routinely and when visibly soiled. Work surfaces will also be cleaned frequently using normal cleaning products.

Additional examples of infection control measures include:

- Stay at home when you are sick. If possible, stay away from work, school and from running errands. You will help others from catching your illness.
- Cover your coughs and sneeze into tissue, or cough into your shirt sleeve.
- Enhance existing housekeeping service by wiping down and disinfecting work areas (i.e. keyboards, telephones, desks, etc.) frequently.
- Enhance housekeeping services for general public use areas several times throughout the work period.
- Use personal protective equipment where appropriate to minimize exposure (i.e. gloves - for handling money, masks - for ill employees)

Implementation, Testing, and Revision of the Plan

The plan and emergency communication strategies will be periodically tested (at least annually) to ensure it is effective and workable.

Testing the plan will be accomplished by conducting exercises. Exercises range from low stress to full scale, hands-on drills. A tabletop exercise is the easiest way to begin testing the plan. This type of exercise involves having discussions regarding a scenario that challenges the plan and the decision makers during an emergency. Functional exercises take on an additional level of complexity, in that they actually require participants to conduct functional components of the plan. This usually involves planning specific scenarios, creating pretend data and present issues that target an area within the plan to be tested.

Each of these methods of testing the plan requires extensive planning for the exercise and the evaluation. The evaluation is critical to revising the plan, by capturing actual responses during the exercise or drill objectively. Once this data is captured, an after-action report with recommendations to revising the plan should be completed within a few weeks of the exercise.

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A revision of the Pandemic Preparedness plan shall occur following the onset of a pandemic event. The revision should include lessons learned and implement 'best practices' to ensure we continue protecting our employees and the general public from pandemic-related scenarios. These lessons learned will be reviewed and/or implemented after a pandemic event.

Training

Employees will be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease and when it is appropriate to return to work after illness. Disease containment plans and expectations should be shared with employees. Communicating information with non- English speaking employees or those with disabilities must be considered.

Documentation of all training is required.

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				Revision Date:	8/01/2024
PERSONNEL PROTECTIVE EQUIPMENT			Revision No.	4	
			Next Revision Date:	8/01/2025	
Preparation: Chris Lynn	Authority: Vice-President-EHS	Issuing Dept: EHS	Page:	Page 1 of 11	

Purpose

The purpose of the Personal Protective Equipment (PPE) section is to set forth the procedures for the use, care, and maintenance of personal protective equipment required to be used by employees for the prevention of injuries.

Scope

Applies to all Company employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence. However, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

EHS SPECIALIST/MANAGER

- Assists in the selection of appropriate PPE. If a task exposes an employee to hazards which cannot be eliminated through engineering or administrative controls, the EHS Manager assists the supervisor and project manager to identify and select PPE suitable for the specific task performed, conditions present, and frequency and duration of exposure. Employees need to give feedback to the supervisor about the fit, comfort, and suitability of the PPE being selected. Employees are provided reasons for selection of PPE.
- Assists supervisor and site managers in assuring all PPE obtained meets regulatory and this procedure's requirements.
- Performs Worksite Hazard Assessments - The hazard assessment must indicate a determination if hazards are present or are likely to be present, which necessitate the use of PPE. Sources of hazards include, but are not limited to: hazards from impact/motion, high/low temperatures, chemicals, materials, radiation, falling

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objects, sharp objects, rolling or pinching objects, electrical hazards, and workplace layout.

- Certifies in writing the tasks evaluated, hazards found and PPE required to protect employees against hazards and ensures exposed employees are made aware of hazards and required PPE before they are assigned to the hazardous task. Certificate shall include certifier's name, signature, dates and identification of assessment documents.

MANAGERS AND SUPERVISORS

- Supervisors and managers shall regularly monitor employees for correct use and care of PPE, and obtain follow-up training if required to ensure each employee has adequate skill, knowledge, and ability to use PPE.
- Supervisors and managers shall enforce PPE safety rules following the guidance of the Company progressive disciplinary procedures and ensure Required PPE Poster is posted properly.

EMPLOYEES

- Complying with the correct use and care of PPE.
- Reporting changes in exposure to hazardous conditions that might require a follow-up assessment of the task for PPE.
- Reporting and replacing defective PPE
- Wearing of required PPE is a condition of employment.

Procedure

GENERAL

Employee-owned equipment is NOT permitted, except for safety toe footwear and prescription safety glasses. The Company is still responsible for the assurance of the adequacy, maintenance and sanitation of those two items.

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All PPE issued shall be at no cost to the employee and PPE shall be used and maintained in a sanitary and reliable condition.

All employees will know and follow the procedures outlined in this Program.

EYE PROTECTION

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids or chemical gases or vapors. Eye and Face PPE must comply with ANSI Standard Z87.1-2003 (Z87+), *Occupational and Educational Personal Eye and Face Protective Devices*.

Foam-Lined (Spoggles) Safety Glasses

Foam-lined "Spoggle" Safety glasses that meet ANSI Z-87.1-2003 standards with "high Impact lenses" are required to be worn by all employees, subcontractors, and visitors while on Company property, at all times, as described below:

- At field locations, in shops and warehouses, except in approved, designated, striped safety zones.
- In all yard work zones or by everyone when in the vicinity of loading or unloading equipment, performing mechanic or maintenance work, test stand operations, operating equipment such as forklifts, welding, or any type of work which has the potential to inflict an eye injury.
- In any office, restroom, or any other building while performing any type of work where a potential eye injury may be present.
- Visitors will be provided with visitor glasses. In the absence of approved prescription safety glasses, "over the glass" type safety glasses or goggles must be worn over the non-safety glasses until approved prescription safety glasses are obtained.
- Workers assisting welders must wear absorbent safety glasses that protect the wearer from ultra-violet (UV) and/or infrared rays (IR).
- Dark shaded lens (sunglasses) darker than a # 1 shade is prohibited to be worn indoors unless welding or assisting a welder.
- A doctor must support "exceptions for medical reasons" in writing to exempt safety eyewear requirements.
- Safety glasses are not required:
 - o Inside offices.
 - o Parking lots when traveling from vehicles to and from office buildings by way of main doors that do not pass through shops.

Goggles

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- Chemical splash proof goggles shall be worn when handling or mixing liquid chemicals, solvents, paints, etc., and/or as recommended on the Material Safety Data Sheet of the material being handled.

Face Shields

- Full face shields shall be worn over safety glasses when operating hand held or stationery grinders with abrasive or wire wheels, while chipping paint or concrete or, performing jobs where there is the potential for flying objects striking the face and safety glasses or goggles would not provide adequate protection.

HEAD PROTECTION

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from employee initiated impact or impact from falling or other moving objects. Helmets must comply with ANSI Standard Z89.1-1997 Class E, *American National Standard for Industrial Head Protection* for Type II head protection or be equally effective.

- Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects.
- Hardhats are to be worn at all field, shop and warehouse locations, or where deemed necessary as per each location's PPE Hazard Assessment.
- Hardhats will not be altered in any way.
- Do not paint or apply unauthorized stickers, name plates, etc.
- Do not drill, cut, bend, or apply heat.
- Do not alter the suspension system.
- Hardhats will be inspected by the employee regularly for cracks, chips, scratches, signs of heat exposure (sun cracks), etc.
- Defective hardhats will be replaced immediately.
- Hardhats shall not be placed in rear windows of vehicles where they will be exposed to the sun or become projectiles during an accident.
- A supply of hardhats must be made available to visitors.
- Company shall provide hardhats.
- Employees will be trained in the use, care and maintenance of head protection equipment.

HEARING PROTECTION

Hearing protection is required to be worn by all employees, subcontractors, and visitors while in posted "High Noise" areas. Refer to the Company Hearing Conservation Program for more information.

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Warning signs will be posted in areas known or suspected to have noise levels exceeding 85 dBA either constantly or intermittently.

When signs are not posted, employees shall wear hearing protection when noise caused by machinery, tools, etc., prevents normal conversations to be heard clearly.

Rule of thumb: If you have to yell to be heard, hearing protection is required

Types

- Molded Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hard hat mounted Earmuffs and earplugs shall be provided to the employee in sizes and configurations that will be comfortable to the employee.

Care and Maintenance

- Inspect hearing protection prior to each use.
- Hearing protection must be kept clean to prevent ear infections.
- Most earplugs used today are disposable and must be discarded when they become dirty, greasy, or cracked.
- Earmuffs that have deteriorated foam inserts, cracked seals or are defective must be replaced.

Fit

- Due to individual differences, not everyone can wear the same type of hearing protection. A variety of styles may have to be tried before one is found to be comfortable and provide adequate protection.
- Employees shall be instructed how to obtain the proper fit.

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HAND PROTECTION

Gloves

- Gloves are required to be worn when performing work, which may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals.
- ANSI A3 cut-level (or above) gloves are the minimum level of hand protection when Company employees are exposed to the possibility of cuts and abrasions.
- Welding: Welding gloves made of leather or other heat resistant materials shall be worn when performing arc welding or oxy/gas cutting.
- Chemical: Impervious (chemical resistant) gloves shall be worn when handling chemicals that specify gloves as personal protection equipment when handling.
- Refer to the specific chemical's Safety Data Sheet for the correct glove type.
- Persons assigned to working with chemicals, i.e., solvent vats, shall be issued their own individual gloves for hygiene purposes.
- Leather: Leather gloves should be worn when working with sharp materials or when handling rigging equipment.
- Cloth: Cloth gloves should be worn when handling objects or materials, which could cause blisters, splinters, cuts, etc.
- Heat Resistant: Heat resistant gloves shall be worn when handling hot bearings, races, or other materials or objects that have been heated beyond ambient temperatures.
- Insulated: Insulated gloves shall be worn to prevent frostbite in extreme cold climates.
- Glove Inspections
 - Gloves shall be inspected before each use for holes, tears, and worn areas.
 - Chemical gloves shall be periodically air tested for pinholes by twisting the cuff tightly, apply low air pressure to expand the glove, and then submersing in water to check for bubbles.
 - Defective gloves shall be discarded immediately. Exception: machinists are exempted from wearing gloves while working with rotating machinery.

FOOT PROTECTION

Safety footwear shall be worn by all employees with regularly assigned duties at field locations, in shops and warehouses.

- Office workers and visitors who enter these areas on an infrequent basis will not be required to wear foot protection provided they stay clear of the work being

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performed.

- If required to be in the close proximity of the work, the work will be stopped while visiting the area or safety footwear will be worn.

Shops, Field Locations, Warehouses and Parts Departments: Leather or equivalent boots, either lace up or pull up, shall be worn.

- The boot must provide ankle protection and have soles designed to protect from punctures with defined heels for climbing ladders.
- Metatarsal guards will be worn when duties present a hazard of equipment or material crushing the foot.
- All safety footwear must meet ANSI Z41-1999 standards.
- Client locations may require safety footwear to be worn by everyone; check with the local supervisor for client requirements before visiting field locations.

Work Boot Reimbursement Policy

Each Company employee with field-based responsibilities who has been continuously employed by Company for at least one (1) year shall be eligible to receive a \$125.00 boot reimbursement. Amounts above \$125 will be deducted from the employee's payroll. The work boot voucher can be used annually and must be approved by the Company EHS Specialist or EHS Manager.

FALL PROTECTION

Personal fall protection is required when performing certain elevated jobs in excess of four feet. Consult the Company Fall Protection Program.

ELECTRICAL PROTECTION

Consult the Company Electrical Safety Program.

WORKSITE HAZARD ASSESSMENT

During a hazard assessment the following sample hazard sources will be identified:

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- High or low temperatures; Chemical exposures (use SDS for guidance)
- Flying particles, molten metal or other eye, face, or skin hazards
- Falling objects or potential for dropping objects; employee falling from a height of 6’ or more
- Sharp objects rolling or pinching that could crush the hands or feet
- Electrical hazards

Where these hazards could cause injury to employees, personal protective equipment must be selected to substantially eliminate the injury potential. Employees will be notified for the selection and reason.

The results of this assessment shall be communicated to each affected employee and kept at the local office.

Selected/identified PPE shall be fitted to each affected employee. Exemptions for use of PPE must be supported by the PPE hazard assessment.

MONITORING

Supervisors and site managers monitor worksite tasks for changes in, or the introduction of, new hazards. If new hazards are discovered, they advise the HSE Manager who then conducts a hazard assessment for appropriate PPE. The HSE Manager monitors the effectiveness of the PPE Procedure and makes recommendations to management to improve the procedure.

Training

Each employee who requires PPE shall be properly trained. Training shall include:

- When PPE is necessary.
- What PPE is necessary

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- How to properly don, doff, adjust and wear PPE.
- The limitations of PPE.
- How to maintain PPE in a sanitary and reliable condition.

RETRAINING

Retraining is required when:

- The workplace changes, making the previous training obsolete.
- The type of PPE changes.
- When the employee demonstrates lack of use, improper use, or insufficient skill or understanding in PPE selection, necessity, use and limitations.

DOCUMENTATION

Training shall be documented and records kept at the local office. The training documentation shall include:

- Name of employee(s) trained;
- The dates of training; and
- The training subject.

PPE Matrix For Company

Location: Insert Location or Work Site

D = Depends on situation M = Mandatory - = Not Mandatory unless hazards become present

SUBJECT TO CHANGE BASED ON INDIVIDUAL WORKSITE HAZARD ASSESSMENT **CHANGE ALL AS NEEDED**

PPE Matrix For Company		Location: __Insert Location or Work Site__		Job/Task	Field Tech	Housekeeping	Shop Work	Driving	Office	Winter Conditions
D = Depends on situation M = Mandatory - = Not Mandatory unless hazards become present										
SUBJECT TO CHANGE BASED ON INDIVIDUAL WORKSITE HAZARD ASSESSMENT CHANGE ALL AS NEEDED										
CATEGORY	EQUIPMENT	HAZARD	INSPECTION	MAINTENANCE						
Head Protection:										
	Hard Hat (Class G or E Only)	Striking Head or Falling Objects	Each use	Dispose	-	-	D	-	-	-
Eye and Face Protection:										
	Safety Glasses w/Shields	Objects Striking Eyes	Each use	Dispose	D	D	M	*	-	M
	Impact Vented Goggles	Small Particles in Eyes	Each use	Dispose	-	-	D	-	-	D
	Chemical Splash Goggles	Chemicals or Oil in Eyes	Each use	Dispose	D	D	D	-	-	-
Hearing Protection:										



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	Disposable Earplugs	Damage to Hearing (85 db)	Each use	Dispose	D	D	D	-	-	-
	Ear Muffs (w/Disposables)	Damage to Hearing (105 db)	Each use	Dispose	D	D	D	-	-	-
Personal Protective Clothing:										
	Cold Weather Clothing	Cold Temperature	Each use	Clean & Repair	D	D	D	D	-	D
	Rainwear	Wet body	Each use	Dispose	-	-	D	-	-	-
	Protective Sleeves	Biohazardous materials	Each use	Dispose	-	M	-	-	-	-
	Insert more or delete as needed									
Foot Protection:										
	Slip Resistant Footwear	Injury to Body	Each use	Replace	M	M	M	-	-	-
	Anti-Slip Cleats during Winter	Injury to Body	Each use	Dispose	M	M	M	-	-	M
Hand Protection:										
	Anti-Cut Gloves	Cuts	Each use	Dispose	M	D	M	-	-	-
	Vinyl Disposable Gloves	Biohazardous Material	Each use	Dispose	-	M	-	-	-	-
	Heavy Duty Gloves	Injuries to Hands	Each use	Dispose	-	-	M	-	-	-
	Cold Weather Gloves	Environmental Exposure	Each use	Dispose	-	-	-	-	-	M
	Rubber Gloves	Hot Water Burns	Each use	Dispose	M	-	-	-	-	-

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Purpose

The purpose of this program is to address the hazards and protection of workers from smoke produced from wildfires.

This program applies to all employees of Company, temporary employees, and contractors working for Company. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program does not exist or is less stringent.

Key Responsibilities

Employees

- All shall be familiar with this procedure and follow its requirements.

General Requirements

The Company must make effective advance provisions for prompt medical treatment in the event of serious injury or illness caused by wildfire smoke exposure.

The easiest method for finding the current and forecasted AQI for PM2.5 – The easiest way to find the current and forecasted AQI FOR PM2.5 is via the internet at www.AirNow.gov and entering the zip code of the affected location. The current AQI may also be discovered from the U.S. Forest Service at <https://tools.airfire.org> or a local air district, which can be located at www.arb.ca.gov/capcoa/dismap.htm The EPA website www.enviroflash.info can transmit daily and forecasted AQI's by text or email for particular cities or zip codes.

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The Company is required to obtain current AQI levels for PM2.5 applicable for worksites in which employees may be exposed to wildfire smoke.

Communicating Wildfire Smoke Hazards

The Company shall establish and implement a system for communicating wildfire smoke hazards in a form readily understandable by all affected employees. Examples include written and spoken communications in the native language of affected workers. The program must also include provisions designed to encourage employees to inform the Company of wildfire smoke hazards at the worksite without fear of reprisal. The program must include effective procedures for:

- Informing employees of:
 - o The current AQI for PM2.5 (CAL/OSHA T8 CCR 5141.1) as defined in subsection ©; and
 - o Protective measures available to reduce their wildfire smoke exposures.
- Encouraging employees to inform the employer of:
 - o Worsening air quality; and
 - o Any adverse symptoms that may be the result of wildfire smoke exposure such as asthma attacks, difficulty breathing, and chest pain.

Action Level

- The Company must implement the provisions of this program whenever employee exposures are 151 or greater based on the AQI for PM2.5 for a total of one hour or more during a shift.

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- The action level for protection from wildfire smoke in an Air Quality Index (AQI) of 151 or greater in which employees are exposed for a total of one hours or more per shift.

Reducing Employee Exposure

The Company shall reduce employee exposures to PM2.5 to less than a current AQI of 151 by engineering controls whenever feasible. Examples include providing enclosed buildings, structures, or vehicles where the air is filtered.

Respiratory Protection

When affected employees are exposed to PM2.5 that has an AQI equal to or greater than 151 but does not exceed 500, the Company must provide respirators to all employees for voluntary use and encourage employees to use such respirators.

Right to Obtain Medical Treatment

The Company shall inform affected employees of their right to obtain medical treatment with regards to exposure to wildfire smoke without fear of reprisal. Employees who show signs of injury or illness due to wildfire smoke exposure shall be allowed to seek medical treatment without fear of reprisal.

Training

Employees who have the potential to be exposed to wildfire smoke via inhalation shall be trained on the potential negative health effects. Company shall provide training to affected workers who have the potential to be exposed to smoke generated by wildfires. The training program must include the hazards to personnel caused by inhalation of particulate matter contained in wildfire smoke.

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The program describes the negative health effects from inhalation of particulate matter to include lung irritation, persistent coughing, phlegm, wheezing, or difficulty breathing. The program must also include the potential for serious health problems such as reduced lung function, bronchitis, worsening asthma, heart failure, early death, and warn that people over 65 and those with pre-existing heart and lung problems are most likely to suffer from serious health effects.

Fire Risk Category	Industrial operations carried out on worksite without stony surface	Industrial Operations carried out on worksite with stony surface
Very high fire risk operations	Not applicable	1.Operation that uses heavy machinery equipped with metal parts that may come into contact with rocks or similar material in the normal course of operation and cause a spark. 2.Stripping of the surface vegetation and forest floor with heavy machinery
High fire risk operations	1.Hot work 2. Rail production grinding. 3. Operation that uses heavy machinery equipped with metal parts that may come into contact with rocks or similar material in the normal course of operation and cause a spark. 4. Switch crossing grinding	1.Hot work 2. Rail production grinding. 3. Blasting of rock or soil without use of blasting mats. 4. Switch crossing grinding 5. Operations using a channel saw where the surface vegetation and forest floor have not been removed up to a distance of at least 3 meters from the place where the channel saw is being operated on the worksite.

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Moderate Fire Risk Operation	1. Blasting of rock or soil without the use of blasting mats. 2. Delimbing or slashing felled trees with heavy machinery 3. Slash piling 4. Using a portable sawmill 5. Striping of the surface vegetation and forest floor with heavy machinery 6. Drilling operation that does not use water as a coolant or flushing agent and that is carried out in an area that has not been cleared of the surface vegetation and forest floor. 7. Induced polarization surveys using a power generator.	1. Delimbing or slashing felled trees with heavy machinery 2. Using a portable sawmill 3. Slash piling 4. Building, spreading, or shaping the sub-grade with a backhoe or excavator. 5. Operation using three or more brush saws 6. Operation using heavy machinery with rubber tires and no chains. 7. Drilling operation that does not use water as a coolant or flushing agent and that is carried out in an area that has not been cleared of the surface vegetation and forest floor. 8. Induced polarization surveys using a power generator.
Low Fire Risk Operation	1. Building, spreading, or shaping the sub-grade with a backhoe or excavator 2. Graveling and grading roads 3. Stream work: water crossing installation and repairs, bridge-work, and stream rehabilitation. 4. Portable chipping. 5. Loading wood or gravel and hauling.	1. Graveling and grading roads. 2. Bulldozer flattening of sub-grade (mineral soil) 3. Stream work: water crossing installation and repairs, bridge-work, and stream rehabilitation. 4. Portable chipping. 5. Loading wood or gravel and hauling.

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	6.Operation using chainsaws or brush saws.	6.Operation using chainsaws or no more than two brush saws.
	7.Blasting with mats.	7.Blasting with mats.
	8.Operation using all-terrain vehicles(whether equipped with wheels or rubber tracks.	8.Operation using all-terrain vehicles(whether equipped with wheels or rubber tracks.
	9. Operation using heavy machinery with rubber tires and no chains.	9. Manual industrial operations such as tree planting and tending, claim staking, and manual stripping.
	10.Pitting and trenching with mechanical equipment, including the use of a channel saw, where the surface vegetation and forest floor have been removed up to at least 3 meters from the site.	10.Pitting and trenching with mechanical equipment, including the use of a channel saw, where the surface vegetation and forest floor have been removed up to at least 3 meters from the site.
	11.Manual industrial operations such as tree planting and tending, claim staking, and manual stripping.	11.Manual industrial operations such as tree planting and tending, claim staking, and manual stripping.
	12. Drilling operation that uses water as a coolant or flushing agent or that is carried out in an area that has been cleared of the surface vegetation and forest floor.	12. Drilling operation that uses water as a coolant or flushing agent or that is carried out in an area that has been cleared of the surface vegetation and forest floor.
	13.The following railway operations: surfacing, tie installation, undercutting, gauging, spiking, and gophering.	13.The following railway operations: surfacing, tie installation, undercutting, gauging, spiking, and gophering.
	14.Induced polarization surveys using a battery.	14.Induced polarization surveys using a battery.
	15.Electromagnetic surveys using either a power generator or a battery.	15.Electromagnetic surveys using either a power generator or a battery.

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Purpose

The primary objective of this Process Safety Management (PSM) program is to prevent unwanted releases of hazardous chemicals into locations which could expose employees and others to serious hazards including those in the work environment. Process Safety Management is the proactive identification, evaluation and mitigation or prevention of chemical releases that could occur as a result of failures in process, procedures or equipment. The major purpose of process safety management of highly hazardous chemicals is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries. An SDS should be made available for all chemicals.

Scope

The Company is required to recognize and participate as a contract employer at client locations with PSM Programs in place. The Company as a contractor has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows:

- The Company shall ensure that each employee is trained in the work practices necessary to safely perform his/her job.
- The Company shall assure that each employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.
- The Company shall document that each employee has received and understood the training required by process safety management. The Company shall prepare a record, which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.
- The Company will ensure that each employee follows the safety rules of the facility including the safe work practices required with 1910.119(f)(4).
- The Company shall advise the employer of any unique hazards presented by The Company's work, or of any hazards found by The Company's work.
- The Company will ensure that trade secret information will be kept in confidence as process safety information is released to them.

The Company employees shall participate in all as directed client PSM requirements, including:

- Employee Participation; Process Safety Information (PSI)
- Process Hazards Analysis (PHA) Operating Procedures

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• Training • Pre-Startup Safety Review (PSSR) • Hot Work Permits • Incident Investigation • Compliance Audits	- Contractors - Mechanical Integrity - Management of Change (MOC) - Emergency Planning and Response - Trade Secrets

Procedure

The Company PSM program describes how employees are involved in the programs, how process hazard analyses are conducted, and preparation of operating procedures and practices, training, pre-startup safety, mechanical integrity, management of change, incident investigation, emergency preparedness, and compliance audits.

The Company will use an organized and systematic effort to identify and analyze the significance of potential hazards associated with the processing or handling of highly hazardous chemicals that may be associated with contract work.

Initial startup and normal operating procedures will be fully evaluated with the client as part of the pre-startup review to assure a safe transfer into the normal operating mode for meeting the process parameters whenever contract work interrupted a process.

The Company, as a contract employer shall follow safe work practices established by the employer. The client shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; hot work; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to client employees and contractor employees. To comply with 1910.119(f)(4) The Company employees are required to complete all required documentation for any permit-required activities.

Any temporary and permanent changes to process chemicals, technology, equipment and facilities during contract work will be managed in accordance to the client PSM. Both technical and mechanical changes will be authorized by the client

The Company shall not perform hot work until a hot work permit is obtained from the client. The permit shall document that provisions of CFR 1910.252(a) have been met.

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Emergency Action and Fire Prevention Plans that comply with OSHA standard 29 CFR 1910.38 will be established with the client before the start of any contract work. These plans will describe the actions employees must take in the event of an emergency.

The Company employees must immediately report all accidents, injuries and near misses. An incident investigation must be initiated within 24 hours. Resolutions and corrective actions must be documented and maintained for 5 years.

In the event The Company becomes the sole operator of a facility, the existing PSM Program for that facility may be amended and adopted or, in the absence of a PSM Program, an assessment will be required prior to assuming operating responsibilities.

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Purpose

It is the intention of the Company to provide a respirator protection program that meets or exceeds all federal standards. The Company will attempt to engineer potential harmful vapors and oxygen-deficient atmosphere exposure hazards out of the work environment. If engineering control measures are not feasible or during emergency situations with high exposure, then respirators shall be provided which are applicable and suitable for purpose intended.

Scope

This program applies to all Company projects and operations.

Respiratory Program Administrator

Overall responsibility for the respiratory protection program is assigned to the Company EHS Manager in order to ensure that specific requirements are followed.

The Administrator must be knowledgeable of the complexity of the program, conduct evaluations, and be properly trained.

This assignment is made, however, with the understanding that individual supervisors will have to implement and enforce major portions of the program. It is understood that the Program Administrator will report performance problems to the appropriate manager for resolution. The person who will have responsibility for administering all the aspects of this program will be the Project Manager or their designee.

The responsibilities of the Program Administrator will include, but are not limited to:

- Conducting an annual written evaluation of the program. The program evaluation should be completed no later than December 31st of each year.
- Ensuring an adequate supply of respirators, cartridges, and repair/replacement parts. The Program Administrator may delegate this duty but will retain overall responsibility. The person(s)

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to whom this duty has been delegated is the Project Manager and/or Field Supervisor.

- Ensuring that only respirators that have been approved by the Corporate Health and Safety Office are ordered and used. Under no circumstances will respirators be used that have not been approved by NIOSH/MSHA. The selected designated respirator manufacturer for the Company is Honeywell.
- Ensuring that all respirator users have been trained in the use, selection and limitations of the type of respirators they will be using prior to the first time the respirator must be used. While the duty of conducting the training may be delegated, the Program Administrator retains final responsibility for seeing that all employees are appropriately trained.
- Ensuring that all respirator users have been medically evaluated and found fit to use the type of respirators that will be required in their job. The medical evaluation must be completed prior to assigning any employee to a task that requires use of a respirator.
- Ensuring that all respirator users are fit-tested at least annually and more often if other federal requirements apply.
- Ensuring that respirators are individually issued, are cleaned and sanitized on a regular basis, and respirators are stored in a clean and accessible location. This duty may also be delegated but the Program Administrator retains final responsibility for seeing that it is done.
- Ensuring that respirators are selected based on the hazard that will be encountered. This program describes the basic respirators that will be used at this site and the tasks for which they will be required. In special circumstances, the Program Administrator will contact the corporate health and safety staff for guidance in selecting the correct respirator.
- Ensuring that employee exposure is monitored to assure correct respirator type is used. Exposure monitoring may be delegated to others but, the Program Administrator has final responsibility of monitoring completion and to request assistance when necessary.
- Ensuring surveillance of employees who wear respirators shall leave the area to wash, change cartridges or if they detect break-through or resistance.
- Ensuring that the elements of the Respiratory Protection Program for the selection, use, cleaning, maintenance, storage and fit testing of respirators are followed.
- Ensuring that respirator parts are not exchanged between brands of respirators.
- Ensuring medical evaluations, respirators and required training are provided at no cost to the employee.

Medical Requirements

GENERAL

The Company shall provide a medical evaluation to determine the employee's ability to use a respirator before the employee is fit tested or required to use the respirator in the workplace. The Company may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

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MEDICAL EVALUATION PROCEDURES

The Company shall identify a physician or other licensed health care professional (PLHCP) to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire. The medical evaluation shall obtain the information requested by the OSHA Respirator Medical Evaluation Questionnaire (or equivalent).

The medical evaluation prior to fit-testing will be confidential, conducted during normal working hours, be at a convenient time and location, be understandable and the employee will be given a chance to discuss the results with the PLHCP.

SUPPLEMENTAL INFORMATION FOR THE PLHCP

The following information must be provided to the PLHCP before the PLHCP makes a recommendation concerning an employee's ability to use a respirator:

- The type and weight of the respirator to be used by the employee.
- The duration and frequency of respirator use (including use for rescue and escape);
- The expected physical work effort.
- Additional protective clothing and equipment to be worn; and
- Temperature and humidity extremes that may be encountered.

The Company shall provide the PLHCP with a copy of the Company Respiratory Protection Program.

Note: When the Company replaces a PLHCP, the Company must ensure that the new PLHCP obtains this information, either by providing the documents directly to the PLHCP or having the documents transferred from the former PLHCP to the new PLHCP. However, OSHA does not expect employers to have employees medically re-evaluated solely because a new PLHCP has been selected.

MEDICAL DETERMINATION

In determining the employee's ability to use a respirator, the Company shall obtain a written recommendation regarding the employee's ability to use the respirator from the PLHCP. The recommendation shall provide only the following information:

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- Any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

All recommendations are to be sent to the Company's EHS Manager.

Additional Medical Evaluations

At a minimum, the Company shall provide additional medical evaluations that comply with the requirements of this program if:

- An employee reports medical signs or symptoms that are related to ability to use a respirator;
- A PLHCP, supervisor, or the respirator Program Administrator informs the Company that an employee needs to be re-evaluated;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, and temperature) that may result in a substantial increase in the physiological burden placed on an employee.

Work Site Procedures

Each work site where respirators are required to protect the health of the worker shall have work site procedures that follow the guidelines of this program. Specific procedures may also be required by our client which will be followed. The following areas shall be included:

- Identification of specific hazard requiring respiratory protection
- The selection of the appropriate respiratory protection equipment based on the specific hazard and concentration levels, characteristics, etc. Specific brand and models of respiratory equipment to be used shall be identified in the procedures.
- Verification that each user of respiratory protection is qualified (medical approval, current fit test, annual training and demonstrates competency).

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Respirator Selection Criteria

The selection of the respiratory equipment is based on the hazards the employee is exposed to. The Company shall:

- Perform hazard identification
- Select and provide respirators based on those hazards and factors affecting performance
- Establish brands and models to be used
- Estimate exposures and contaminant information.

HAZARD IDENTIFICATION

Due to the many varied work locations, The Company's identification of respiratory hazards will be contained in the various work site specific safety plans. However, common respiratory hazards that will be encountered include:

- Dust
- Fumes
- Gases
- Chemical Particles
- Oxygen Deficiency

Characteristics of Hazardous Operation or Process

- Hot Operations: welding, chemical reactions, soldering, melting, melding and burning
- Liquid Operations: painting, degreasing, dipping, spraying, brushing, coating, etching, cleaning, pickling, plating, mixing, galvanizing and chemical reactions
- Solid Operations: pouring, mixing, separations, extraction, crushing, conveying, loading, bagging and demolition.
- Pressurized Spraying: cleaning parts, applying pesticides, degreasing, sand blasting and painting
- Shaping Operations: cutting, grinding, filing, milling, melding, sawing and drilling

Gaseous Contaminants

- Inert gases (helium, argon, etc.), which do not metabolize in the body but displace air to produce an oxygen deficiency.
- Acid gases (SO₂, H₂S, HCl, etc.) which are acids or produce acids by reaction with water.
- Alkaline gases (NH₃, etc.), which are alkalies or produce alkalies by reaction with water.
- Organic gases (butane, acetone, etc.), which exist as true gases or vapors from organic liquids.

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- Organometallic gases (tetraethyl lead, organo-phosphates, etc.), which have metals attached to organic groups.

Particulate Contaminants

- Dusts are mechanically generated solid particulates (0.5 to 10µm)
- Fumes are solid condensation particles of small diameter (0.1 to 1.0 µm)
- Mists are liquid particulate matter (5 to 100 µm)
- Smoke is chemically generated particulates (solid and liquid) of organic origins (0.01 to 0.3 µm)

SELECTION OF RESPIRATOR

The following factors shall be taken into account when selecting the proper respirator:

Concentration and Type of Contaminant

The concentration and type of contaminant will determine the model and type of respirator and cartridges/filters or filters to be used. The concentration is based on a sampling of the atmosphere.

Location of Hazardous Area

(Confined Space, Nearby Contaminants, etc.)

Worker Activity

(Extreme Heat, Cold, Welding Hood Requirement, etc.)

Types of Respirators

Air-Purifying Respirators can be either full-face or half masks with mechanical or chemical cartridges to filter dusts, mists, fumes, vapors or gases.

Powered Air-Purifying Respirators use a blower to pass the contaminated air through a filter. The purified air is then delivered into a mask or hood. They filter dusts, mists, fumes, vapors and gases, just like ordinary air- purifying respirators.

Air-purifying respirators cannot be used in oxygen-deficient atmospheres, which can result when another gas displaces the oxygen or consumption of oxygen by a chemical reaction occurs. Oxygen levels below 19.5% require either a source of supplied air or supplied-air respirator protection. Levels below 16% are considered to be unsafe and could cause death. To

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determine the proper cartridge for air-purifying respirators contact the Company EHS Manager or a qualified on-site safety representative of the client. You should also consult the Safety Data Sheet of the substance that needs to be filtered.

All cartridges are assigned a color designating the type of contaminant they will filter:

White:	Acid Gas
Black:	Organic Vapors
Green:	Ammonia Gas
Yellow:	Acid Gas and Organic Vapors
Purple:	Radioactive Material
Orange:	Dust, Fumes and Mists
Olive:	Other Gases and Vapors

Once the wearer of the respirator can detect an odor, irritation, or taste of the contaminant, the cartridge should be replaced. All cartridges and/or filters shall be changed at the beginning of each shift.

Supplied-Air Respirators provide the highest level of protection against highly toxic and unknown materials. Supplied air refers to self-contained breathing apparatuses (SCBAs) and air-line respirators. SCBAs have a limited air supply that is carried by the user, allowing for good mobility and fewer restrictions than air-line respirators.

Air Line Respirators have an air hose that is connected to a fresh air supply from a central source. The source can be from a compressed air cylinder or air compressor that provides at least Grade D breathing air.

Emergency Escape Breathing Apparatuses (EEBAs) provide oxygen for 5, 10 or 15 minutes depending on the unit. These are for emergency situations in which an employee must escape from environments immediately dangerous to life or health (IDLH).

THE COMPANY DOES NOT ALLOW EMPLOYEES TO WORK

in an "Immediately Dangerous to Life and Health" (IDLH) environment.

Self Contained Breathing Apparatus (SCBA): "self-contained" means that the breathing set is not dependent on a remote supply.

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In order to maintain the NIOSH/MSHA approval of any respirator, mixing parts from other respirator manufacturers is prohibited. This includes air line hoses, valves, gaskets, cartridges, etc. For example, do not use North cartridges or valve gaskets with an MSA product.

BRAND AND MODELS

The Company has selected North Safety and 3M safety as its NIOSH-certified respirators. Only these brand of respirators shall be used in compliance with the conditions of the certification of its Respiratory Protection Program (fit testing model, no mixing of different manufacturer parts, cartridges, filters, etc.).

The specific model will be based on the hazard, concentration of contaminant, oxygen level, work environment and type of work being performed. To aid in the selection process the following will be used to identify the proper North respiratory equipment for the work being performed and hazard that is present.

- NIOSH Pocket Guide to Chemicals
- North Cartridge Selection Guide
- North Respirator Selection Guide

ESTIMATE OF EXPOSURES AND CONTAMINANT INFORMATION

- No employee shall enter an IDLH environment.
- Normal oxygen levels shall be maintained.
- No employee shall be exposed to an atmosphere containing concentrations that would exceed the STEL or PEL for the identified atmospheric hazard.

Respirator Fit Testing

Before an employee may be required to use any respirator with a negative or positive pressure tight-fitting face piece, the employee must be fit tested with the same make, model, style, and size of respirator that will be used. This section specifies the kinds of fit tests allowed, the procedures for conducting them, and how the results of the fit tests must be used.

All respirator users are fit tested at least annually and more often if other federal requirements apply. Supplied Air

Respirators are required to be fit tested as well.

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The Company shall ensure that employees using a tight-fitting face piece respirator pass an appropriate quantitative fit test (QNFT) as stated in this program.

The Company shall ensure that an employee using a tight-fitting face piece respirator is fit tested prior to initial use of the respirator, whenever a different respirator face piece (size, style, model or make) is used, and at least annually thereafter.

The Company shall conduct an additional fit test whenever the employee reports, or The Company's PLHCP, supervisor, or Program Administrator makes visual observations of, changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

If after passing a QNFT, the employee subsequently notifies The Company Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable, the employee shall be given a reasonable opportunity to select a different respirator face piece and to be retested.

The fit test shall be administered using an OSHA-accepted QNFT protocol. The OSHA-accepted QNFT protocols and procedures are contained in this section.

If the fit factor, as determined through an OSHA-accepted QNFT protocol, is equal to or greater than 100 for tight-fitting half-face pieces, or equal to or greater than 500 for tight-fitting full-face pieces, the QNFT has been passed with that respirator.

Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators shall be accomplished by performing quantitative or qualitative fit testing in the negative pressure mode, regardless of the mode of operation (negative or positive pressure) that is used for respiratory protection.

Quantitative fit testing of these respirators shall be accomplished by modifying the face piece to allow sampling inside the face piece in the breathing zone of the user, midway between the nose and mouth. This requirement shall be accomplished by installing a permanent sampling probe onto a surrogate face piece, or by using a sampling adapter designed to temporarily provide a means of sampling air from inside the face piece.

Any modifications to the respirator face piece for fit testing shall be completely removed, and the face piece restored to NIOSH-approved configuration, before that face piece can be used in the workplace.

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FIT TEST PROCEDURES

The requirements in this section apply to all OSHA-accepted fit test methods, both QLFT and QNFT.

The test subject shall be allowed to pick the most acceptable respirator from a sufficient number of respirator sizes so that the respirator is acceptable to, and correctly fits, the user.

Prior to the selection process, the test subject shall be shown how to put on a respirator, how it should be positioned on the face, how to set strap tension and how to determine an acceptable fit. A mirror shall be available to assist the subject in evaluating the fit and positioning of the respirator. This instruction may not constitute the subject's formal training on respirator use, because it is only a review.

The test subject shall be informed that he/she is being asked to select the respirator that provides the most acceptable fit. Each respirator represents a different size and shape, and if fitted and used properly, will provide adequate protection.

The test subject shall be instructed to hold each chosen face piece up to the face and eliminate those that obviously do not give an acceptable fit.

The more acceptable face pieces are noted in case the one selected proves unacceptable; the most comfortable mask is donned and worn at least five minutes to assess comfort. Assistance in assessing comfort can be given by discussing the following points:

- If the test subject is not familiar with using a particular respirator, the test subject shall be directed to don the mask several times and to adjust the straps each time to become adept at setting proper tension on the straps.
- Position of the mask on the nose
- Room for eye protection
- Room to talk
- Position of mask on face and cheeks

The following criteria shall be used to help determine the adequacy of the respirator fit:

- Chin properly placed;
- Adequate strap tension, not overly tightened;
- Fit across nose bridge;
- Respirator of proper size to span distance from nose to chin;
- Tendency of respirator to slip;

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- Self-observation in mirror to evaluate fit and respirator position.

Use the Fit Test form.

USER SEAL CHECK

Before conducting the negative and positive pressure checks, the subject shall be told to seat the mask on the face by moving the head from side-to-side and up and down slowly while taking in a few slow deep breaths. The test subject shall conduct a user seal check, either the negative or positive pressure seal checks described below:

Positive Pressure Check

Close off the exhalation valve and exhale gently into the face piece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the face piece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve and then carefully replacing it after the test.

Negative Pressure Check

Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the face piece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the face piece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

The test shall not be conducted if there is any hair growth between the skin and the face piece sealing surface, such as stubble beard growth, beard, moustache or sideburns which cross the respirator sealing surface. Any type of apparel which interferes with a satisfactory fit shall be altered or removed, including glasses.

If a test subject exhibits difficulty in breathing during the tests, she or he shall be referred to a physician or other licensed health care professional, as appropriate, to determine whether the test subject can wear a respirator while performing her or his duties. If the employee finds the fit of the respirator unacceptable, the test subject shall be given the opportunity to select a different respirator and be retested.

Prior to the commencement of the fit test, the test subject shall be given a description of the fit test and the test subject's responsibilities during the test procedure. The description of the process shall include a description of the test exercises that the subject will be performing. The respirator to be tested shall be worn for at least 5 minutes before the start of the fit test.

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The fit test shall be performed while the test subject is wearing any applicable safety equipment that may be worn during actual respirator use which could interfere with respirator fit.

Test Exercises

Each test exercise shall be performed for one minute except for the grimace exercise which shall be performed for 15 seconds. The test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried. If due to medical or health conditions the employee cannot perform the test exercises, the fit test shall not be performed and the employee not allowed to use a respirator until all elements of the fit test can be achieved.

The respirator shall not be adjusted once the fit test exercises begin. Any adjustment voids the test and the fit test must be repeated.

The following test exercises are to be performed for all fit testing methods prescribed in this procedure:

- Normal breathing: In a normal standing position, without talking, the subject shall breathe normally.
- Deep breathing: In a normal standing position, the subject shall breathe slowly and deeply, taking caution so as not to hyperventilate.
- Turning head side to side: Standing in place, the subject shall slowly turn his/her head from side to side between the extreme positions on each side. The head shall be held at each extreme momentarily so the subject can inhale at each side.
- Moving head up and down: Standing in place, the subject shall slowly move his/her head up and down. The subject shall be instructed to inhale in the up position (i.e., when looking toward the ceiling).
- Talking: The subject shall talk out loud slowly and loud enough so as to be heard clearly by the test conductor. The subject shall read from the Rainbow Passage.

Rainbow Passage

"When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond reach, his friends say he is looking for the pot of gold at the end of the rainbow." Continue to read for one minute.

- Grimace. The test subject shall grimace by smiling or frowning. (This applies only to QNFT testing; it is not performed for QLFT)
- Jogging in place. The test subject shall jog in place being careful to be aware of their surroundings.

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- Normal breathing. Same as exercise (1).

Quantitative Fit Test (QNFT) Protocols

Using controlled negative pressure and appropriate instrumentation to measure the volumetric leak rate of a face piece to quantify the respirator have been demonstrated to be acceptable to OSHA.

The Company shall ensure that persons administering QNFT are able to calibrate equipment and perform tests properly, recognize invalid tests, calculate fit factors properly and ensure that test equipment is in proper working order.

The Company shall ensure that QNFT equipment is kept clean and is maintained and calibrated according to the manufacturer's instructions so as to operate at the parameters for which it was designed.

Portacount Fit Test Requirements

- Check the respirator to make sure the respirator is fitted with a high-efficiency filter and that the sampling probe and line are properly attached to the face piece.
- Instruct the person to be tested to don the respirator for five minutes before the fit test starts. This purges the ambient particles trapped inside the respirator and permits the wearer to make certain the respirator is comfortable. This individual shall already have been trained on how to wear the respirator properly.
- Check the following conditions for the adequacy of the respirator fit: Chin properly placed; Adequate strap tension, not overly tightened; Fit across nose bridge; Respirator of proper size to span distance from nose to chin; Tendency of the respirator to slip; Self-observation in a mirror to evaluate fit and respirator position.
- Have the person wearing the respirator do a user seal check. If leakage is detected, determine the cause. If leakage is from a poorly fitting face piece, try another size of the same model respirator, or another model of respirator.
- Follow the manufacturer's instructions for operating the Portacount and proceed with the test.
- The test subject shall be instructed to perform the exercises in Test Exercises section of this procedure.
- After the test exercises, the test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried.

Portacount Test Instrument

The Portacount will automatically stop and calculate the overall fit factor for the entire set of exercises. The overall fit factor is what counts. The Pass or Fail message will indicate whether or not the test was successful. If the test was a Pass, the fit test is over. Since the pass or fail criterion of the Portacount is user programmable, the test operator shall ensure that the pass or fail criterion meet the requirements for minimum respirator performance.

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A record of the test needs to be sent to the Safety Manager and kept on file, assuming the fit test was successful. The record must contain the test subject's name; overall fit factor; make, model, style, and size of respirator used; and date tested.

Use, Maintenance and Care of Respirators

This section requires The Company to provide for the use, cleaning and disinfecting, storage, inspection, and repair of respirators used by employees. Appendix B - Respirator Cleaning Procedures (Mandatory) shall be followed.

USE

- Items that can affect the face to mask seal are prohibited. This includes facial hair, glasses, clothing, etc.
- Each time a respirator is put on, a positive and negative pressure check shall be performed.

CLEANING AND DISINFECTING REQUIREMENTS

The Company shall provide each respirator user with a respirator that is clean, sanitary, and in good working order. The Company shall ensure that respirators are cleaned and disinfected using the procedures in this Respiratory Protection Program, or procedures recommended by the respirator manufacturer, provided that such procedures are of equivalent effectiveness. The respirators shall be cleaned and disinfected at the following intervals:

- Respirators issued for the exclusive use of an employee shall be cleaned and disinfected by the employee as often as necessary to be maintained in a sanitary condition,
- Respirators used in fit testing and training shall be cleaned and disinfected after each use by the Safety Manager or designated person.
- Each individual who is assigned a cartridge respirator is responsible for seeing that the respirator is cleaned, inspected and properly stored.

CLEANING PROCEDURES

- Remove filters, cartridges, or canisters. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.
- Wash components in warm water with a mild detergent or with a cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.
- Rinse components thoroughly in clean, warm, preferably running water. Drain.
- When the cleaner used does not contain a disinfecting agent, respirator components should be immersed

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for two minutes in commercially available cleansers of equivalent disinfectant quality. Another alternative is to use wipes containing alcohol that are intended for use with respirators.

- Rinse components thoroughly in clean, warm, preferably running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on face pieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.
- Components should be hand-dried with a clean lint-free cloth or air dried. Reassemble face piece, replace filters, cartridges, and canisters where necessary. Test the respirator to ensure that all components work properly.

STORAGE AND INSPECTION

- Respiratory equipment shall be stored in a manner to protect it from damage, contamination, temperature extreme, etc.
- Respiratory equipment intended for emergency use shall be stored in an area that is readily accessible and be clearly marked.

The Company shall ensure that respirators are inspected as follows:

- All respirators used in routine situations shall be inspected by the employee before each use and during cleaning;
- A check by the employee of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the face piece, head straps, valves, connecting tube, and cartridges, canisters or filters; and
- A check of elastomeric parts for pliability and signs of deterioration.
- Emergency respiratory equipment will be inspected at least monthly, and before and after each use.
- Escape-only respiratory equipment will be inspected before being carried into workplace.

BREATHING AIR QUALITY AND USE

The Company shall ensure that compressed air accords with the following specifications:

- Compressed breathing air shall meet at least the requirements for Type 1-Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:
 - o Oxygen content (v/v) of 19.5-23.5%;
 - o Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;
 - o Carbon monoxide (CO) content of 10 ppm or less;

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- o Carbon dioxide content of 1,000 ppm or less; and
 - o Lack of noticeable odor.
- The Company shall ensure that oxygen is not used in compressed air units.
 - The Company shall ensure that oxygen concentrations greater than 23.5% are used only in equipment designed for oxygen service or distribution.
 - The Company shall ensure that cylinders used to supply breathing air to respirators meet DOT requirements and that:
 - o Cylinders are tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 and part 178);
 - o Cylinders of purchased breathing air have a certificate of analysis from the supplier that the breathing air meets the requirements for Type 1--Grade D breathing air; and
 - o The moisture content in the cylinder does not exceed a dew point of -50 deg. F (-45.6 deg. C) at 1 atmosphere pressure.
 - The Company shall ensure that compressors used to supply breathing air to respirators are constructed and situated so as to:
 - o Prevent entry of contaminated air into the air-supply system;
 - o Minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (5.56 deg. C) below the ambient temperature;
 - o Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions.
 - Have a tag containing the most recent change date and the signature of the person authorized by The Company to perform the change. The tag shall be maintained at the compressor.
 - For compressors that are not oil-lubricated, The Company shall ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.
 - For oil-lubricated compressors, The Company shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.
 - The Company shall ensure that breathing air couplings are incompatible with outlets for nonrespirable worksite air or other gas systems. No asphyxiating substance shall be introduced into breathing air lines.

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REPAIRS

The Company shall ensure that respirators that fail an inspection or are otherwise found to be defective are immediately removed from service, and are discarded or repaired or adjusted in accordance with the following procedures:

- Repairs or adjustments to respirators are to be made only by persons appropriately trained to perform such operations and shall use only the respirator manufacturer's NIOSH-approved parts designed for the respirator.
- Repairs shall be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed.

VOLUNTARY USE

If an employee chooses to voluntarily wear a respirator when not required by this Program (contaminants do not meet protection standards, odors, etc.) they will be advised of the following in their training:

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for employees.

However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the employee. Sometimes, employees may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

- Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator limitations.
- Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.

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- Keep track of your respirator so that you do not mistakenly use someone else's respirator.

Workplace Monitoring

A program of monitoring potential employee exposures has been implemented through the corporate health and safety department. Project personnel may also be assigned with the task of conducting air monitoring. Direct-reading instruments will also be used in the characterization of potential exposures. All the data collected is used to determine the appropriateness of the respiratory equipment.

Recordkeeping

The Company will establish and retain written information regarding medical evaluations, fit testing and the respirator program. Records of medical evaluations required by this section must be retained and made available in accordance with 29 CFR 1910.1020. The Company shall provide the employee with an opportunity to discuss the questionnaire and examination results with the PLHCP.

Records will be treated confidentially and maintained on file in the The Company corporate office by the Safety Manager.

Program Evaluation

The Company shall conduct evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.

The Company shall regularly consult employees required to use respirators to assess the employees' views on this program's effectiveness and to identify any problems. Any problems that are identified during this assessment shall be corrected. Factors to be assessed and verified include, but are not limited to:

- Respirator fit (including the ability to use the respirator without interfering with effective workplace performance); appropriate respirator selection for the hazards to which the employee is exposed;
- Proper respirator use under the workplace conditions the employee encounters; and

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- Proper respirator maintenance.

Training

All employees will receive respirator training during their initial health and safety training class and on at least an annual basis, if required for their job classification. Training shall address employee knowledge of respirators, fit, use, limitations, emergency situations, wearing, fit checks, maintenance & storage, medical signs and symptoms of effective use and general requirements of the OSHA standard. The training must be provided before requiring the employee to use the respirator.

RETRAINING

Retraining shall be administered annually, and when the following situations occur:

- Changes in the workplace or the type of respirator render previous training obsolete;
- Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill; or
- Any other situation arises in which retraining appears necessary to ensure safe respirator use.

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Introduction

The Company recognizes the need to provide transitional work to employees who are unable to perform their regular duties due to occupational injury or illness. This program applies to all employees. The amount of transitional work may be limited. Employees receive assignments on availability and a “first-come, first-served” basis.

Scope

For the purposes of this program, an occupational injury or illness means an injury or disease arising out of the employment with The Company and compensable under state workers compensation laws.

Definition

For the purposes of this program, an employee who is temporarily partially disabled as a result of an occupational injury or illness is a person whose medical condition permits him or her to perform some occupational function.

PROGRAM GOALS

- To provide work for employees with job-related injuries or illnesses that restrict regular job performance, so they may receive supplemental compensation and benefits while recovering from the injury or illness.
- To assist employees in the transition from injury or illness to recovery while continuing to be a productive part of the work force.
- To provide management with a constructive program to reduce the cost of workers compensation.
- To prevent the deterioration of employees’ work skills, health and attitude that could result from prolonged work absence.
- To demonstrate the organization’s commitment to employee recovery.
- To minimize the loss of productivity.

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Roles and Responsibilities

EMPLOYER/TOP MANAGEMENT

Senior management's commitment to our Return-to-Work Program is key to the overall success of the disability management program.

- Develop a written policy, signed by top management, with clearly defined procedures that communicate management's philosophy.
- Assign the responsibility for coordinating and evaluating the managed disability program by designating an RTW Coordinator.
- Hold all managers/supervisors/employees accountable for their participation in the program by establishing roles and responsibilities for each.
- Provide training for all managers/supervisors/employees on disability issues and their roles and responsibilities in achieving a successful RTW Program.
- Inform the insurance provider that our organization has an RTW Program and that the intent is to bring employees back to work as soon as possible.

RTW COORDINATOR

The RTW Coordinator shall be responsible for oversight and implementation of the RTW Program and will provide, with management's support, high-level direction and promotion of the RTW Program

consistent with our goals and commitment to our workforce.

- Understand and promote the RTW Program.
- Monitor progress of returning injured/ill employees to work and problems that may occur.
- Record and report progress to management weekly.
- If the employee is released to work with restrictions that prohibit a return to regular job duties, determine whether job modifications or alternative work can be provided within the physician's restrictions.
- Notify the employee if modified work is available and send a copy of the job offer to the employee as well as the insurance claims adjuster.
- Review accommodations with the employee and supervisor prior to his or her return to work to ensure everyone understands the restrictions.
- Monitor the job to determine compliance with the restrictions and the feasibility of continuing the position once the pre-determined time frame has been reached.
- Maintain employee contact on a regular basis to determine whether or not employee can or cannot return to regular work or modified/alternative work.

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MANAGER/SUPERVISOR RESPONSIBILITIES

Managers and supervisors provide critical support, in that how they respond to the work injury can directly influence the duration of disability.

- Understand and support the company's written policies/procedures by providing written protocol and conducting training.
- Complete an accident investigation as soon as possible after the injury and forward the report to the RTW Coordinator to ensure that accurate information is reported to the insurance company.
- Be sure that employee does not exceed restrictions or limitations and communicate to the RTW Coordinator if there are any issues.
- Communicate, not less than weekly, with the RTW Coordinator and immediately report any problems or concerns regarding the transitional work assignment.
- All medical files must be kept confidential. Only the injured party, medical provider(s) and authorized individual working for the employer can have access to and view these records. These files will be kept in a secured (locked) file cabinet at all times except for immediate use or viewing.
- All of the documentation received by the employer will be maintained and filed accordingly. Confidential medical files relating to an employee will be retained for future reference and recording purposes.

EMPLOYEE RESPONSIBILITIES

Employees should understand the program, expectations and how their role impacts results. An employee can positively impact outcomes by reporting injuries immediately, cooperating with the

Insurance Claims Adjuster and health care provider staff, staying in touch with appropriate parties and being available for modified or transitional job assignments during their recovery.

- Follow procedures for reporting all injuries and illnesses immediately.
- Communicate/cooperate with managers/supervisors regarding ability to return to work.
- Cooperate with the health care provider regarding ability to return to work.
- Work within the physical capabilities outlined in the transitional duty plan by the health care provider.
- Abide by the work/safety rules.

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MEDICAL PROVIDER RESPONSIBILITIES

- Become familiar with The Company operations, job demands and the transitional/light work duty program.
- Communicate both verbally and in writing with the RTW Coordinator, the Insurance Claims Adjuster or manager/supervisor regarding employee status.
- Promote early return to work with injured employee by determining what the employee "CAN" do.
- Utilize our provided company forms to communicate status of employee so that the company can facilitate modifying or finding transitional work.

Health care provider or staff provides the RTW Coordinator with a medical status update after each medical appointment and at the conclusion of the transitional work assignment period.

POST-INJURY PROCEDURE

1. Immediately following an injury:
 - Send employee for medical treatment to an approved medical provider.
 - Complete an incident report form.
 - Notify HR/ Corporate Manager within 24 hours, so claim handling can begin in a timely manner.
 - Collaborate with the division manager and assistant project manager to document all activities leading to the accident including time sheets.
2. Provide an information packet to the physician's office at the time of the initial visit. The prepared packet should include:
 - Letter to the treating doctor that explains the Return To Work program, providing carrier information and identify an employer contact (see attachment 1).
 - Work Release/Physical Capacities Form (see attachment 2). It is critical to know the work restrictions that may be placed on an injured worker by the physician.

MODIFIED DUTY/TRANSITIONAL WORK JOB ASSIGNMENT

1. Upon the receipt of Work Release/Physical Capacities Form, the RTW Coordinator, in conjunction with division manager/ assistant project manager, will review restrictions and determine location/department and modified position/transitional work assignment.
2. Once the location/department and modified position/transitional work assignment has been determined, the RTW Coordinator will contact the physician to review the position and obtain approval. Once approval has been received from the physician, the Manager/Supervisor will be notified.

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- Employee will then be informed of modified duty or transitional work assignment and an "Offer of Modified/Transitional Work Assignment" letter will be sent to the employee for their acknowledgement (see attachment 3). Employee will have 2 days to accept the position. Signed acceptance will be given to the assistant project manager for implementation.

MONITORING THE MODIFIED/TRANSITIONAL WORK ASSIGNMENT

- The RTW Coordinator will assist the assistant project manager in maintaining regular contact with employees in ongoing modified/transitional work assignments.
- The RTW Coordinator will also assist the assistant manager in monitoring the assignment for appropriateness, and will contact the division manager if there are any issues.
- Physician, the Insurance Claims Adjuster and any other involved party will be kept informed if changes are necessary.
- The employee's status shall be evaluated once a month, at a minimum. If the restrictions are of short duration, the employee will be evaluated on a weekly basis.
- Maintain weekly contact between Supervisor and employee post return-to-work.

EMPLOYEE WORK HOURS AND COMPENSATION

- No overtime will be permitted while the employee is participating in the RTW Program.
- An employee eligible to participate in the program may not substitute paid sick leave because he/she does not personally feel ready to perform the modified/transitional work assignment. The employee will be sent to the physician for re-evaluation of ability to work.
- Workers Compensation temporary disability benefits will be supplemented depending on pay while the employee is participating in the RTW Program provided the number of hours under the job assignment is the same as the employee's regularly scheduled work hours.

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TERMINATION

Under the RTW Program, an employee will be removed from modified duty under the following circumstances:

- The termination date specified in the Offer of Modified/Transitional Work Assignment letter.
- Ninety calendar days from the beginning date specified in the Offer of Modified/Transitional Work Assignment letter.
- Upon receipt by the Company of a medical report stating the employee can return to regular duties.
- Upon receipt by the Company of a medical report stating that the employee will be permanently unable to return to the job performed at the time of injury.

Date:

Healthcare Provider's Name:

Address:

RE: Employee's Name

Dear Sir/Madam:

Thank you for your prompt treatment of our valued employee. Our company has implemented a Return To Work program designed to return any injured employee to medically appropriate work as soon as possible.

We would also like you to know that we try to provide modified duty for all our injured workers when feasible and in your judgment, poses no safety risks for the employee or co-workers. We can try to provide a variety of tasks to suit the employee's capabilities and will work with you to provide appropriate placement. When possible, we will modify our employee's regular job to accommodate any disability.

Please complete the enclosed **Work Release/Physical Capacities** Form. We will try to assign the employee to job duties that are suitable for any restrictions you specify. Please call if you have any questions.

Thank you for your assistance.

Sincerely,

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Choose an item.

CERTIFIED MAIL—RETURN RECEIPT

Employee Name: _____ Date: _____

Home Address: _____

RE: Offer of Modified Position or Transitional Work Assignment

Date of Injury: _____

Dear: _____

(Employee Name)

After reviewing information provided by your doctor, we are pleased to offer you light duty responsibilities, job modified to accommodate your current health status.

We believe this assignment will be within your capabilities as described by your healthcare provider's Work Release/Physical Capacities Form. You have only been assigned tasks consistent with your physical abilities, skills and knowledge. Your Healthcare Provider has released you for temporary modified work and has approved the job of _____.

Please report to: _____ on _____

(Contact Name, Contact Title)

(Date)

_____ will be your supervisor.

(Name)

Location: _____

Duration of Assignment: From: _____

To: _____

Work Hours: From: _____

To: _____

Wages: _____

(hour/week/month)

Nothing in this letter will alter your status as an employee at will.

Sincerely, _____

(RTW Coordinator)

(Date)

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Purpose

The purpose of this section is to outline safe handling procedures of Liquefied Petroleum Gas (LPG).

Scope

Applies to all Company employees who handle LPG and to those employees who change LPG tanks on forklifts or other equipment fueled by LPG.

Key Responsibilities

Managers and Supervisors

- Will ensure that only approved LPG containers are used, stored properly and employees under their supervision are trained in the safe handling of LPG.
- Employees must be trained and follow LPG safe handling procedures.

Procedure

Statement of general information regarding Liquefied Petroleum Gas: Liquefied Petroleum Gas is derived from two principal sources; it may be extracted, from the earth, with natural gas or derived from crude oil during the refining process. The two most common LP gases are propane and butane. LP gas is widely used as a domestic fuel because it is convenient, relatively inexpensive and safe when handled correctly. As with any fuel however, certain simple safety precautions must be observed.

Statement regarding the characteristics of LP Gas: LP gas is usually stored as a liquid under pressure. When released into the atmosphere at any temperature above its boiling point, -43° F for propane and 32° F for butane, it will change from a liquid to a vapor. LPG on bare skin causes frostbite. LPG is considered to be nontoxic but may have some anesthetic effect if inhaled in high concentrations. LPG is heavier than air. In both its liquid and vapor states, LPG is colorless and odorless. An odorizing agent is usually added to ensure that any leakage can be detected by smell.

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PPE REQUIREMENTS

When either handling or when there is potential exposure to LPG, safety glasses and rubber or leather gloves must be worn to protect the body from cold related injuries.

PRECAUTIONS TO ENSURE EMPLOYEE SAFETY WHEN USING LPG

When using LPG appliances or equipment, always follow manufacturer's directions and maintain appliances in a clean and undamaged condition.

Before operating LPG equipment, be sure connections are tight.

- If leaks are present, turn off the equipment and check connections.
- Do not operate until the leak is fixed.
- Be aware that if a leak has occurred, LPG is heavier than air and will settle in low spots such as cellars or drains – ventilate well.
- Keep vertical cylinders upright, even when empty, to ensure the pressure relief valve can operate effectively. A cylinder lying horizontally and involved in fire is more likely to burst (except cylinders designed to operate horizontally that must be stored horizontally so safety equipment will work properly).
- LPG cylinders shall be stored outside of buildings or shops.
- See the Compressed Gas Program for additional information regarding proper storage.
- Ensure the pressure relief valve is pointed away from the structure supporting the cylinder, in case the relief valve operates and the discharge ignites.
- When using a gas barbecue or other LPG equipment outdoors, be sure the area is clear and free from any ground fuel or litter that may ignite in the event of a fire.
- Protect cylinders from direct sun.
- On extremely hot days, if the relief valve operates, cool the cylinder with water.
- Keep cylinders clear of rubbish or brush.
- Any fire around the cylinder will increase the pressure within.
- Secure portable cylinders.
- If the relief valve operates, unsecured cylinders could move about rapidly and erratically due to the jetting action.

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FORKLIFT TRUCK LPG SAFETY

The following procedure to safely remove and install a LPG tank describes a typical operation; the forklift manufacturer's procedure must be reviewed and followed if different:

- Ensure no one is smoking within fifty feet of fork truck during replacement of the LPG tank.
- Lower the forks and load to the ground.
- Set the brake, shut down the engine and turn the ignition off if the fork truck shuts down by running out of fuel.
- Wear safety glasses and rubber or leather gloves.
- Close the valve on the tank.
- Loosen the hose from the tank slowly, allowing pressure to bleed off.
- Release securing clamp on tank.
- Position body for proper lifting techniques.
- Get close to the load.
- Use legs for lifting.
- Do not twist while lifting.
- Remove the empty LPG tank and replace with a full one.
- Secure the clamp and attach the hose.
- Open the valve slowly and check for leaks.
- Place the empty LPG tank in the proper storage area.

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PURPOSE

The Company Safety Committee is an effective element of our overall safety and health program to enhance the well-being of workers and the overall safety culture of the organization. Members are made up of managers/supervisors and employees in all departments. Membership is voluntary and is rotated periodically. Having the employees' first-hand knowledge of how, when and why hazards occur and the degree of risk related to the hazards, is the real strength of the safety committee.

SCOPE

Safety Committee members meet regularly (monthly) to promote joint interest between management and employees, to create and maintain a safe and healthy workplace. They maximize available resources and information regarding safety and health efforts and issues. The ultimate objectives of the safety committee are to reduce risk, have a positive effect on the loss experience of the company and contribute to the well-being of the workforce.

Requirements

The following procedures will be agreed upon jointly by management and workers that cover the normal functions of the committee:

- Meetings: Frequency, starting time, length, agenda, attendance requirements, type of minutes or records to be kept, training committee members, and how safety information will be disseminated to management and workers.
- Inspections: How inspectors will be trained and evaluated, checklists or report forms they will use and how these will be distributed when complete.
- Incident Investigation: Investigator training, report distribution, management review and response, and supervisor/employee counseling.
- Safety Problems: Analysis, risk assessment, safety systems, machine guarding, air quality, etc.
- Progress Measurement: Objectives, metrics, and reporting.

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Duties

The Company Safety Committee's duties include the following:

- Reviewing incident investigation reports to verify that action was taken to prevent recurrence.
- Keeping company safety and health rules and procedures up to date.
- Addressing employee safety concerns.
- Promoting safety and health activities.
- Determining the need for training and education.
- Conducting periodical oversight inspections of departments and/or worksites to determine that hazards are not being overlooked.
- Reviewing incident statistics to identify areas or operations with high incident frequency.

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Safety Mission

The Company firmly believes that incident prevention is the cornerstone of a safe work

environment. **The health and welfare of our employees and all stakeholders who touch our work are of the utmost importance to the company.** We believe in a '360°' approach to safety such that employees at all levels of the company are responsible for contributing to the overall safety culture. Our employees participate in our world-class safety training program on a recurring basis.



We **expect** each employee to stop the job when he or she perceives something to be unsafe. The newest or most inexperienced employee has the same right and responsibility to exercise Stop Work Authority (SWA) as the most senior, experienced executive of the company.



Each employee is **empowered** to "take five" minutes as often as necessary to refocus attention on awareness of hazards around us and observe the work area to assess – and reassess – for hazards and confirm that effective risk control measures are fully implemented.



Once we see something at risk, we take **immediate action** by engaging the relevant stakeholders who can address it. The

Company employees understand that a safe workplace starts with our own actions.  **Record:**

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Through documentation, we share our observations and corrective actions to enable the company to track, trend, and share best practices and lessons learned to prevent incidents, injuries, and illnesses. This most importantly ensures everyone gets home safely.



We resume work cautiously and are always mindful of the potential for changing circumstances that would warrant our repeating this process as often as necessary.

*Safety is a core at the Company and will remain uncompromised by scheduling constraints, weather, deadlines, or profit margin. By continuously perfecting this exercise, we shine brightly as safety **STARS!***

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Purpose

The purpose of this program is to establish guidelines for the protection of Company employees who work on scaffold projects with the primary objective of preventing injuries due to falls from elevated work areas. It also includes training provisions and guidelines for scaffold erection and use.

Scope

This program is applicable at every work site where scaffolding is erected. When work is performed on a non-owned or operated site, the operator's program shall take precedence. However, this document covers Company employees and contractors and shall be used on owned premises or when an operator's program doesn't exist or is less stringent.

Policy

Scaffolds shall be erected, moved, dismantled, or altered only under the supervision of a competent person and will have guardrails and toe boards installed when necessary. When scaffolding hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, Personal Protective Equipment (PPE), and proper training regarding scaffolds will be implemented. These measures will be implemented to minimize those hazards to ensure the safety of our employees.

Definitions

Adjustable Suspension Scaffold – A suspension scaffold equipped with a hoist(s) that can be operated by an employee(s) on the scaffold.

Bearer – A horizontal transverse scaffold member upon which the scaffold platform rests and which may be supported by ledgers or runners.

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Brace – A rigid connection that holds one scaffold member in a fixed position with respect to another member, or to a building or structure.

Competent Person – One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Coupler – A device for locking together the tubes of a tube and coupler scaffold.

Guardrail System – A vertical barrier, consisting of, but not limited to, top rails, midrails, and post, erected to prevent employees from falling off a scaffold or walkway or lower levels.

Hoist – A manual or power-operated mechanical device to raise or lower a suspended scaffold.

Heavy Duty Scaffold - A scaffold designed and constructed to carry a working load not-to-exceed 75 pounds per square foot.

Light Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 25 pounds per square foot.

Lower Level – An area below the level where the employee is located and to which an employee can fall.

Maximum Intended Load - The total of all loads including the working load, the weight of the scaffold, and such other loads as may be reasonably anticipated. Each scaffold and scaffold component shall be capable of supporting, without failure, its own weight and at least four times the maximum intended load applied or transmitted to the scaffold. To figure the maximum intended load, total the weight of all persons, equipment, tools, materials, transmitted loads, and other loads reasonably anticipated to be applied to the scaffold (or scaffold components) at any one time. (Persons are estimated at 250 pounds each.)

Medium Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 50 pounds per square foot.

Mid-Rail - A rail midway between the guardrail and platform, used when required, and secured to the uprights erected along the exposed sides and ends of platforms.

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Platform – A work surface elevated above lower levels. Platform can be constructed of approved scaffold wood planks or steel planks.

Qualified Person – One who by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his/her ability to solve or resolve problems related to the subject matter, the work, or the project.

Runner - The lengthwise horizontal spacing or bracing member which may support the bearers.

Scaffold - Any temporary elevated platform and its supporting structure used for supporting workmen or material or both.

Suspension Scaffold – One or more platforms suspended by ropes or other non-rigid means from an overhead structure(s).

System Scaffold – A scaffold consisting of posts with fixed connection points that accept runners, bearer, and diagonals that can be interconnected at predetermined levels.

Toe Board - A barrier secured along the sides and ends of a platform, to guard against the falling of material.

Working Load - Load imposed by men, material, and equipment.

Key Responsibilities

Managers

- Responsible for ensuring that scaffolds are erected by a competent person, that set up inspections are performed and all daily inspections are performed before work starts for each shift.
- Responsible for ensuring that all employees, and/or contractors have been trained in the use and inspection methods for scaffolds.
- Responsible for ensuring that all employees and contractors are aware that if an inspection

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reveals a defect, the scaffold cannot be used until repairs are made.

Competent Person

- Responsible for scaffold selection, erection, use, alteration, dismantling, maintenance, and inspection.
- The competent person will be knowledgeable about proper selection, care, and use of the fall protection equipment.
- Responsible for assessing all hazards relating projects requiring use of scaffold.

Employees

- Responsible for following this program by inspecting the scaffolds daily and reporting any damages or repairs that may be needed to their supervisor.
- Responsible to report immediately any unsafe act or condition their supervisor.

Procedure

General Requirements

Scaffolds shall be furnished and erected in accordance with applicable standards for persons engaged in work that cannot be done safely from the ground or from solid construction. Except that ladders used for such work shall conform to ladder safety standards.

Scaffolds shall only be erected by trained employees under the supervision competent person who will certify the scaffolding safe to use.

The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying its own weight and the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose boards shall not be used to support scaffolds or planks.

Scaffolds and their components shall be capable of supporting without failure at least four times the maximum intended loads. Scaffold components must meet OSHA requirements 29 CFR 1910.28 and 29 CFR 1926.451.

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Wood scaffold planks must be cross-supported every 8 feet. Scaffold deck boards shall be cleated, wired or nailed into place.

All working levels of scaffolds will be planked completely except where internal ladders require space for ladder openings.

Scaffolds and other devices mentioned or described in this program shall be maintained in safe condition. Scaffolds shall not be altered or moved horizontally while they are occupied.

Any scaffold damaged or weakened from any cause shall be immediately reported to the manufacturer for repairs and shall not be used until repairs have been completed.

Scaffolds shall not be loaded in excess of the working loads for which they are intended.

Bolts used in the construction of scaffolds shall be of adequate size and in sufficient numbers at each connection to develop the designed strength of the scaffold.

All platforms shall be overlapped (minimum 12 inches) and secured from any movement.

An access ladder or equivalent safe access shall be provided.

Scaffold planks shall extend over their end supports not less than 6 inches or more than 18 inches.

The poles, legs, or uprights of scaffolds shall be plumb, and securely and rigidly braced to prevent swaying and displacement.

Material being hoisted onto a scaffold shall have a tag line.

Overhead protection shall be provided for workers on a scaffold exposed to overhead hazards.

Toe boards and guardrails shall be installed if a scaffold or platform is erected to a height of 6 feet or more. Scaffolds shall be provided with a screen between the toe board and the guardrail, extending along the entire opening, consisting of No. 18 gauge wire one-half inch mesh or the equivalent, where workers are required to work

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or pass under the scaffolds. * If toe boards are not used, a yellow tag will be placed on the scaffold following its inspection. The Company always employs the use of a yellow tag once a scaffold has been constructed and determined suitable for use. This ensures that 100% tie-off is maintained at all times and is required.

Work shall not be performed on a scaffold during storms or high winds.

Work shall not be performed on scaffolds that are covered with snow or ice, unless all snow and ice has been removed and all planking has been sanded to prevent slipping.

Tools, material and debris shall not be allowed to accumulate in quantities to cause a hazard.

Types of Scaffolds

There are several types of scaffolds used in construction projects – they all falls under three major categories and Company application find use in almost all of them:

- Self-supporting scaffolds
- Suspension scaffolds
- Special use scaffolds

Self-supporting scaffolds are one or more working platforms supported from below by outriggers, brackets, poles, legs, uprights, posts, frames, or similar supports. The types of self-supporting scaffolds include:

- Safway Systems – used by Groome
- Fabricated Frame
- Tube and Coupler
- Mobile
- Pole

Suspended scaffolds are one or more working platforms suspended by ropes or other means from an overhead structure(s). The types of suspension scaffolds include:

- Single-Point Adjustable (Boatswain's Chairs)
- Two-Point Adjustable (Swing Stage)
- Multiple-Point Adjustable

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- Multi-Lend
- Float (Ship)
- Interior Hung
- Needle Beam

Special use scaffolds and assemblies are capable of supporting their own weight and at least 4 times the maximum intended load. The types of special use scaffolds include:

- Form and Carpenter Bracket
- Roof Bracket
- Outrigger
- Pump Jack
- Ladder Jack
- Window Jack
- Crawling Boards
- Step, Platforms, and Trestle Ladder

Inspections

Scaffolding shall be inspected, by a competent person, in conjunction with the manufacturer's required recommendations using scaffold inspection checklist (see attachment 1). The Competent Person must ensure scaffolds are safe prior to and during scaffold use.

- At a minimum, the following shall be inspected after erection, before the start of day or beginning of a shift change:
 - o Ground or surface footing shall be inspected to ensure that there is no settling.
 - o All main supports and cross braces shall be inspected for any signs of damage, missing pins, bolts and any locks and/or safety keepers.
 - o All walking surfaces and/or planks shall be inspected for damage and proper placements and any possible movement.
 - o All walkways and planks must be secure to prevent any movement.
- Inspection shall be made to ensure that the scaffold is stable and any movement is prevented.
- If during the inspection, a defect or damage to the scaffold is discovered, the scaffold shall be tagged out and use prohibited until needed repairs are made.

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Signs and Tags

Signs and tags shall be visible at all times when work is being performed, and shall be removed or covered promptly when the hazards no longer exist.

Tagging system:

- Red Tag: A red tag will be affixed to a scaffold while it's under construction (being erected or dismantled), when there are defects present or when access is restricted (Groome employee's only).
- Yellow Tag: A yellow tag will be affixed to a scaffold once it has been fully constructed to the specifications of the scaffold erectors. A yellow tag also denotes that there may be missing parts e.g. no toeboards, or that 100% tie-off is required whenever a person accesses the scaffold.
- Green Tag: A green tag will be affixed to a scaffold to notify users that the scaffold is complete and free of defects. A green tag also denotes that fall protection is not required. However, it is Groome policy that requires a yellow tag to be used on all completed scaffolds. This ensures that 100% tie-off is observed at all times.

When hung, all tags must be visible, legible and posted near scaffold access points. A competent person will sign the posted tag before each shift, acknowledging that an inspection has been completed.

Defective or unsafe equipment or conditions shall be tagged out by the Competent Person using a weather resistant tag secured to the scaffolding structure on all four sides and must be complied with.

Danger signs shall be used only where an immediate hazard exists. Danger signs must be posted around the immediate area of the scaffold, to alert other workers of possible danger from falling objects from the scaffold.

Caution Signs and/or barricade tape shall be used to mark off a larger area around scaffolding warning other workers to use caution.

Modifications

Employees shall not perform any modifications or repairs unless they have been trained and certified; failure to comply may result in disciplinary action and or termination.

Modification and/or repairs shall be approved by a qualified person and performed by a competent person.

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Training Requirements

The division manager shall recommend all affected employees to the EH&S manager to receive scaffold training that is particular to their tasks or type of scaffold they are to use. Scaffold training for all affected employees will be in two categories:

- Certified Erector Training provided by Swingstaging (Brand/Safway) or comparable
- Scaffold User Training (in-house) by EH&S Specialist/Coordinator or comparable facilitator

Certified Erector Training

Each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold shall attend Scaffold Erector/Dismantler training. In this training, employees will learn the following topics using OSHA Regulation 29 CFR 1926 Subpart L, as applicable to:

- The nature of scaffold hazards.
- The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in use.
- The design criteria, maximum intended load-carrying capacity and intended use of the scaffold.

The Safway TRN 120 training is a basic requirement for any Groome employees to become a scaffold erector competent person. After this training, aspiring competent person shall work with an experience competent person until a determination is made through job evaluation by the division manager and EH&S manager that the employee has performed satisfactorily to become a competent person.

Erector/Dismantler Training shall be done as needed and no less than every four (4) years for all competent persons and aspiring competent persons. However, when project, operations, division and/or EH&S manager has reason(s) to believe that an employee lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, the EH&S manager shall initiate immediately the re-training of such employee so that the requisite proficiency is re-gained.

Re-training is also required in at least the following situations:

- Where changes in scaffolding at the worksite present a hazard about which an employee has not been previously trained.

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- Where changes in the types of scaffolds, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been previously trained.
- Where inadequacies in an affected employee's work involving scaffolds indicate that the employee has not retained the requisite proficiency.

Scaffold User Training

Each employee working under the supervision of the competent person to perform work on scaffolds shall attend the in-house scaffold user training. Employees will learn during this training how to recognize the hazards associated with scaffold usage and understand the procedures to control or minimize those hazards.

The training shall include the following areas, as applicable:

- Basic safety information.
- The nature of any electrical hazards, fall hazards and falling object hazards in the work area.
- The proper use of the scaffold, and the proper handling of material on the scaffold.
- The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used.
- The maximum intended load and the load-carrying capacities of the scaffolds used.

For specific instructions and specifications on systems scaffold: Refer to Safway Systems Scaffold Technical Manual.

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PURPOSE

The purpose of the Short Service Employee (SSE) Management program is to prevent work-related injuries and illnesses to new hires and temporary workers. The Supervisors and co-workers must be able to readily identify Short Service Employee participants. The Company will assign experienced employees to oversee the daily activities of those assigned to the SSE program.

SCOPE

- Applies to all Company employees in shop and field operations.
- Applies to all newly hired Company employees (regardless of experience), temporary agency personnel or other independent contractors working on company or client locations/ facilities.

DEFINITIONS

Short Service Employee – A Company employee (with less than 1000 working hours with the Company) or a sub-contractor's employee.

Mentor – An experienced employee who has been assigned by his/her supervisor to help and work with a new Short Service Employee.

Orientation Training – Training designed to provide new employees with the necessary safety information and resources needed to perform their duties safely.

KEY RESPONSIBILITIES

Managers and Supervisors shall ensure that this program is implemented and followed. The

Company treats its sub-contractors as Short Service Employees.

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Short Service Employees shall follow the requirements of this program.

PROCEDURE

Supervisors will ensure that all new, transferred and temporary employees have been through The Company Safety Orientation Training and have a complete knowledge of the expectations for their job function.

Supervisors will identify all employees and temporary personnel with less than 1000 working hours or those employees they desire to return to a mentoring status for improvement on the job and/or safety performance. Any Short Service Employee experiencing an OSHA Recordable injury during the initial 1000 working hours will repeat the mentoring program or shall be dismissed for poor performance.

Mentors will set the proper safety example for any Short Service Employee assigned them.

A mentor can only be assigned one SSE per crew and the mentor must be onsite with the SSE to be able to monitor the SSE.

Prior to the job mobilization, The Company will communicate with/notify the project coordinator or on-site supervisor for all jobs containing SSE personnel. The Project Coordinator or on-site supervisor will determine approval status of the crew makeup.

Mentors will converse daily with those persons assigned to them, preferably at the start of the day. This will be in addition to other tailgate or daily safety meetings held in the work area.

Foremen and team leaders are to notify the EHS Department of any attitude of SSE that negates the ethics of our safety program.

The SSE Program will be monitored by the EH&S Department for outlined process compliance. Candidates' evaluations will be performed in conjunction with foremen to determine SSE eligibility to graduate from the program.

For every SSE on a work crew, there must be an experienced employee accessible to them, and no experienced employee shall be responsible for more than three (3) SSEs on a single crew.

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TRAINING

The Company SSEs must complete required Orientation Training before they can start work. Such training shall be specific to the type of work they are likely to perform and their work environment.

At a minimum, SSEs shall receive Orientation Training according to the topics listed in Appendix A.

In addition, field-based SSEs shall receive assigned PPE during Orientation Training, and the Trainer shall provide them with familiarization training on the use, limitations, maintenance, and inspection protocols for each item.

Orientation training shall consist of both computer-based training modules as well as instructor-led training. Assigned instructors shall be competent in the training material provided to SSEs.

All Orientation Training shall be provided in the native language of the SSE.

Orientation Training shall be conducted in the workplace in an environment conducive for training.

Office-based SSEs will be able to complete computer-based training modules remotely. Field-based SSEs must complete Orientation Training in the workplace at one of the Company office locations.

All Orientation Training shall be documented and recorded.

Employees who have left the company and are re-hired must re-take New Hire Orientation when their date of separation exceeds six (6) from their re-hire date.

A Certificate of Orientation shall be signed/dated by both the Trainer and SSE at the time of completion. See Appendix B for an example of the Certificate of Orientation.

Such records shall be maintained by the EHS Department for a period of five (5) years.

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Appendix A

Field SSEs

Training Name	Course Type
Aerial Lifts and Elevated Platform Safety	Online Training
Back Injury Prevention	Online Training
Basic First Aid Awareness	Online Training
Bloodborne Pathogens	Online Training
Cold Stress	Online Training
Compressed Gas Safety	Online Training
Confined Space Entry Awareness	Online Training
Construction Safety - Scaffolding	Online Training
Construction Safety: Lockout/Tagout	Online Training
COVID-19 - General Awareness Training	Online Training
Electrical Safety Awareness	Online Training
Fall Protection	Online Training
Fire Extinguisher Safety	Online Training
Fire Prevention	Online Training
Hand and Power Tool Safety	Online Training
Hazard Communication Awareness	Online Training
Hearing Conservation	Online Training
Heat Illness Prevention (Heat Stress)	Online Training
Incident Reporting & Investigations	Link
Personal Protective Equipment Awareness	Online Training
Portable Ladder Safety	Online Training
Respiratory Protection	Online Training
Rigging Safety in Construction Environments	Online Training
Slip, Trip, and Fall Prevention	Online Training
STARS Safety Observation & Incentive Program	Link
Toolbox Talks & Field Risk Assessments (JSAs)	Link
Welding and Hot Work	Online Training
System Scaffold Erection Training	Document
EHS Manual	Document
EHS Manual - Changes Made	Document

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Sales & Engineer SSEs

Training Name	Course Type
Aerial Lifts and Elevated Platform Safety	Online Training
Back Injury Prevention	Online Training
Basic First Aid Awareness	Online Training
Bloodborne Pathogens	Online Training
Confined Space Entry Awareness	Online Training
Construction Safety - Scaffolding	Online Training
Construction Safety: Lockout/Tagout	Online Training
COVID-19 - General Awareness Training	Online Training
Driver Safety - Defensive Driving	Online Training
Driver Safety - Distracted Driving	Online Training
Drug-Free Workplace: Drug-Free Workplace Programs	Online Training
Electrical Safety Awareness	Online Training
Fire Extinguisher Safety	Online Training
Fire Prevention	Online Training
First Aid	Online Training
Hazard Communication Awareness	Online Training
Incident Reporting & Investigations	Link
Office Workstation Ergonomics	Online Training
Personal Protective Equipment Awareness	Online Training
Respiratory Protection	Online Training
Rigging Safety in Construction Environments	Online Training
Slip, Trip, and Fall Prevention	Online Training
STARS Safety Observation & Incentive Program	Link
Welding and Hot Work	Online Training
Workplace Violence Prevention and Active Shooter Response	Online Training
EHS Manual - Changes Made	Document
EHS Manual	Document

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Office / Administrative Staff SSEs

Training Name	Course Type
Back Injury Prevention	Online Training
Basic First Aid Awareness	Online Training
Bloodborne Pathogens	Online Training
COVID-19 - General Awareness Training	Online Training
Driver Safety - Defensive Driving	Online Training
Driver Safety - Distracted Driving	Online Training
Drug-Free Workplace: Drug-Free Workplace Programs	Online Training
Electrical Safety Awareness	Online Training
Fire Extinguisher Safety	Online Training
Fire Prevention	Online Training
Hazard Communication Awareness	Online Training
Incident Reporting & Investigations	Link
Office Workstation Ergonomics	Online Training
Personal Protective Equipment Awareness	Online Training
Slip, Trip, and Fall Prevention	Online Training
STARS Safety Observation & Incentive Program	Link
Workplace Violence Prevention and Active Shooter Response	Online Training
EHS Manual - Changes Made	Document
EHS Manual	Document

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Appendix B







CERTIFICATE OF ORIENTATION TRAINING

Groome is committed to providing the best orientation training for each of our new hires before sending them out in the field. To achieve this after a successful interview and verification of identity for work authorization status, new employees shall be trained in the following topics:

Training Name	Course Type
Aerial Lifts and Elevated Platform Safety	Online Training
Back Injury Prevention	Online Training
Basic First Aid Awareness	Online Training
Bloodborne Pathogens	Online Training
Cold Stress	Online Training
Compressed Gas Safety	Online Training
Confined Space Entry Awareness	Online Training
Construction Safety - Scaffolding	Online Training
Construction Safety: Lockout/Tagout	Online Training
COVID-19 - General Awareness Training	Online Training
Electrical Safety Awareness	Online Training
Fall Protection	Online Training
Fire Extinguisher Safety	Online Training
Fire Prevention	Online Training
Hand and Power Tool Safety	Online Training
Hazard Communication Awareness	Online Training
Hearing Conservation	Online Training
Heat Illness Prevention (Heat Stress)	Online Training
Personal Protective Equipment Awareness	Online Training
Portable Ladder Safety	Online Training
Respiratory Protection	Online Training
Slip, Trip, and Fall Prevention	Online Training
Welding and Hot Work	Online Training
System Scaffold Erection Training	Online Training
STARS Safety Observation & Incentive Program	Link
Toolbox Talks & Field Risk Assessments (JSAs)	Link
Incident Reporting & Investigations	Link
LG&E KU - Avetta Worker Management - Expro only	Online Training
Assistant Blaster/Shot Record Training - Blasters only	Instructor-Led
EHS Manual	Document
EHS Manual - Changes Made	Document
Other:	

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Additional Orientation Training

- Personal Protective Equipment Demonstration
- Personal Protective Equipment Issuance (Employee initials beside each item they have on-hand):

Hard Hat _____

Foam-lined Safety Glasses (Spoggles) _____

Mono-goggles _____

Ear Plugs _____

Half-Face Respirator _____

Full-Face Respirator _____

Full-Body Harness _____

Double Lanyard / Retractable _____

Safety Trauma Step _____

Lock & Tag _____

A3+ Cut Level Gloves _____

Reflective Vest _____

Equipment Bag _____

Respirator Bag _____

Safety Footwear _____

Other: _____

Other: _____

This is to certify that _____ has successfully completed the required company induction training. S/he is now qualified for field work as a short service employee.

His/her signature below also acknowledges that s/he must bring their PPE bag with boots to each job to which they are assigned and must take their PPE with them at the end of each shift.

Employee Signature: _____ Date: _____

Certified by: _____ Date: _____

Training Proctor

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Purpose

The purpose of the program is to prescribe rules and establish requirements related to signs, signals and barricades for operations by the Company in accordance with CFR 1926.200.

Scope

When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises or when an operator's program doesn't exist or is less stringent.

Definitions

- Barricade means an obstruction to deter the passage of persons or vehicles.
- Signs are the warnings of hazard, temporarily or permanently affixed or placed, at locations where hazards exist.
- Signals are moving signs, provided by workers, such as flaggers, or by devices, such as flashing lights, to warn of possible or existing hazards.
- Tags are temporary signs, usually attached to a piece of equipment or part of a structure, to warn of existing or immediate hazards.

Key Responsibilities

MANAGERS AND SUPERVISORS

- Managers and supervisors are responsible for ensuring that all employees, and/or contractors have been trained in the procedures and equipment associated with signs, signals and barricades.

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EMPLOYEES

- Employees are responsible for following this program.

Procedure

ACCIDENT PREVENTION SIGNS AND TAGS

- General - Signs and symbols required by this procedure shall be visible at all times when work is being performed and shall be removed or covered promptly when the hazards no longer exist.
- Danger Signs
 - Danger signs shall be used only where an immediate hazard exists and shall follow the specifications illustrated in Figure 1 of ANSI Z35.1-1968 or in Figures 1 to 13 of ANSI Z535.2-2011, incorporated by reference in CFR 1926.6.
 - Danger signs shall have red as the predominating color for the upper panel; black outline on the borders; and a white lower panel for additional sign wording.
- Caution Signs
 - Caution signs shall be used only to warn against potential hazards or to caution against unsafe practices and shall follow the specifications illustrated in Figure 4 of ANSI Z35.1-1968 or in Figures 1 to 13 of ANSI Z535.2-2011, incorporated by reference in CFR 1926.6.
 - Caution signs shall have yellow as the predominating color; black upper panel and borders; yellow lettering of "caution" on the black panel; and the lower yellow panel for additional sign wording. Black lettering shall be used for additional wording.



Figure G-2



- The standard color of the background shall be yellow; and the panel, black with yellow letters. Any letters used against the yellow background shall be black. The colors shall be those of opaque

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glossy samples as specified in Table 1 of ANSI Z53.1-1967 or in Table 1 of ANSI Z535.1- 2006(R2011), incorporated by reference in CFR 1926.6.

- Exit Signs - Exit signs, when required, shall be lettered in legible red letters, not less than 6 inches high, on a white field and the principal stroke of the letters shall be at least three-fourths inch in width.
- Safety Instruction Signs - Safety instruction signs, when used, shall be white with green upper panel with white letters to convey the principal message. Any additional wording on the sign shall be black letters on the white background.
- Directional Signs - Directional signs, other than automotive traffic signs shall be white with a black panel and a white directional symbol. Any additional wording on the sign shall be black letters on the white background.
- Traffic Signs
 - Construction areas shall be posted with legible traffic signs at points of hazard.
 - All traffic control signs or devices used for protection of construction workers shall conform to Part VI of the MUTCD, 1988 Edition, Revision 3, or Part VI of the MUTCD, Millennium Edition, incorporated by reference in CFR 1926.6.
- Accident Prevention Tags
 - Accident prevention tags shall be used as a temporary means of warning employees of an existing hazard, such as defective tools, equipment, etc. They shall not be used in place of, or as a substitute for, accident prevention signs.
 - For accident prevention tags, THE COMPANY shall follow specifications that are similar to those in Figures 1 to 4 of ANSI Z35.2-1968 or Figures 1 to 8 of ANSI Z535.5-2011, incorporated by reference in CFR 1926.6.
- Additional Rules. ANSI Z35.1-1968, ANSI Z535.2-2011, ANSI Z35.2-1968, and ANSI Z535.5-2011, incorporated by reference in CFR 1926.6, contain rules in addition to those specifically prescribed in this subpart. THE COMPANY shall comply with ANSI Z35.1-1968 or ANSI Z535.2-2011, and ANSI Z35.2-1968 or Z535.5-2011, with respect to such additional rules.

SIGNALING

- Flaggers - Signaling by flaggers and the use of flaggers, including warning garments worn by flaggers, shall conform to Part VI of the Manual on Uniform Traffic Control Devices (1988 Edition, Revision 3, or the Millennium Edition), incorporated by reference in CFR 1926.6.
- Crane and Hoist Signals - Regulations for crane and hoist signaling will be found in applicable American National Standards Institute standards.

BARRICADES

Barricades for protection of employees shall conform to Part VI of the Manual on Uniform Traffic Control Devices (1988 Edition, Revision 3, or the Millennium Edition), incorporated by reference in §1926.6.

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Training

- The Company must ensure that all affected employees are trained in signs, signals and barricades requirements per this procedure.
- All training shall be documented.

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Purpose

The purpose of the silica exposure control plan (ECP) is to set out our approach to protecting workers from harmful exposure to respirable crystalline silica.

A combination of control measures will be required to achieve this objective. We commit to being diligent in our efforts to select the most effective control technologies available, and to ensure that the best practices, as described in this Exposure Control Plan (ECP), are followed at our worksites.

The work procedures we establish will protect not only our workers but all workers on our worksites.

Key Responsibilities

Due to the significant risk posed by respirable crystalline silica, it is critical that all personnel involved in operations that could potentially create silica dust take specific action to ensure that, as much as possible, a hazard is not created.

The Company is responsible for:

- Substitution of less hazardous products for those that contain crystalline silica is required.
- Ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this exposure control plan (ECP) are readily available where and when they are required.
- Providing a job-specific ECP for each project, which outlines in detail the work methods and practices that will be followed on each site. Considerations will include
 - o Availability and delivery of all required tools/equipment
 - o Scope and nature of grinding work to be conducted
 - o Control methods to be used and level of respiratory protection required
 - o Coordination plan
- Conducting a periodic review of the effectiveness of the ECP. This would include a review of the available dust-control technologies to ensure these are selected and used when practical.
- Initiating sampling of worker exposure to concrete dust when there are non-standard work practices for which the control methods to be used have not been proven to be adequately protective.

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- Ensuring that all required tools, equipment, and personal protective equipment are readily available and used as required by the ECP.
- Ensuring supervisors and workers are educated and trained to an acceptable level of competency.
- Maintaining records of training, fit-test results, crew talks, and inspections (equipment, PPE, work methods/practices).
- Coordinating the work with the prime contractor and other employers to ensure a safe work environment.
- Ensuring that a copy of the written exposure control plan is available to all employees. The written exposure control plan must be available for examination and copying by each employee. Copies may be available electronically or physically, depending on location needs and requirements.

The supervisor (foreman and lead hand) is responsible for:

- Obtaining a copy of the ECP from the Company and making it available at the worksite
- Selecting, implementing, and documenting the appropriate site-specific control measures
- Providing adequate instruction to workers on the hazards of working with silica-containing materials (e.g., concrete) and on the precautions specified in the job-specific plan covering hazards at the location
- Ensuring that workers are using the proper respirators and have been fit-tested, and that the results are recorded
- Directing the work in a manner that ensures the risk to workers is minimized and adequately controlled
- Communicating with the prime contractor and other sub-contractors to ensure a safe work environment

The worker is responsible for:

- Knowing the hazards of silica dust exposure
- Using the assigned protective equipment in an effective and safe manner
- Setting up the operation in accordance with the site-specific plan
- Following established work procedures as directed by the supervisor
- Reporting any unsafe conditions or acts to the supervisor
- Knowing how and when to report exposure incidents

Crystalline Silica Properties

Crystalline silica is a common mineral found in many naturally occurring materials and used in many industrial products and at construction sites. Materials like sand, concrete, stone and mortar contain crystalline silica. Crystalline silica is also used to make products such as glass, pottery, ceramics, bricks, concrete and artificial stone. Industrial

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sand used in certain operations, such as foundry work and hydraulic fracturing (fracking), is also a source of crystalline silica exposure. Amorphous silica, such as silica gel, is not crystalline silica.

Inhaling very small (“respirable”) crystalline silica particles, causes multiple diseases, including silicosis, an incurable lung disease that can lead to disability and death. Respirable crystalline silica also causes lung cancer, chronic obstructive pulmonary disease (COPD), and kidney disease.

List of Tasks That Expose Employees to Respirable Crystalline Silica

A list or description of tasks in the workplace that expose employees to respirable crystalline silica must be in place. Tasks include activities like the below and anything else that is likely to expose employees to respirable crystalline silica:

- Sawing
- Drilling
- Grinding
- Abrasive blasting (e.g., of concrete structures)
- Jackhammering, chipping, or drilling rock or concrete
- Cutting brick or tiles
- Sawing or grinding concrete
- Tuck point grinding
- Road construction
- Loading, hauling, and dumping gravel
- Demolition of structures containing concrete
- Sweeping concrete dust

The list of tasks shall be included in the job hazard assessment or any other form of prework hazard assessment.

Health Hazards

Exposure to respirable crystalline silica has been shown to cause silicosis, lung cancer, pulmonary tuberculosis, and other airway diseases. Crystalline silica dust can cause a disabling, sometimes fatal disease called silicosis. The fine particles are deposited in the lungs, causing thickening, and scarring of the lung tissue. The scar tissue restricts the lungs’ ability to extract oxygen from the air. This damage is permanent, but symptoms of the disease may not appear for many years.

A worker may develop any of three types of silicosis, depending on the concentrations of silica dust and the duration of exposure:

- Chronic silicosis—develops after 10 or more years of exposure to crystalline silica at relatively low concentrations

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- Accelerated silicosis—develops 5 to 10 years after initial exposure to crystalline silica at high concentrations
- Acute silicosis—develops within a few weeks, or 4 to 5 years, after exposure to very high concentrations of crystalline silica

Initially, workers with silicosis may have no symptoms; however, as the disease progresses, a worker may experience:

- Shortness of breath
- Severe cough
- Weakness

These symptoms can worsen over time and lead to death. Exposure to silica has also been linked to other diseases, including bronchitis, tuberculosis, and lung cancer.

Exposure Assessments

Exposure assessments must be conducted for those employees who are expected to be exposed to respirable crystalline silica at or above the action level. The exposure of each employee who is or is expected to be exposed to respirable crystalline silica at or above the action level (8-hour TWA of 25µg/m³) must be assessed. This assessment can be performed by monitoring employees individually or taking a representative sample from employees.

The key step in developing a silica exposure control plan is to identify the work activities that would put workers at risk of exposure.

- Work activities — that may generate airborne silica dust—for silica, the route of exposure is through the inhalation of airborne dust. The employer should have a qualified person review the planned work activities to identify those that may generate airborne silica.
- Identify workers at risk of exposure—For example, workers who finish concrete would be at greater risk of exposure than plumbers or electrical workers.
- Amount of exposure—some work activities generate more dust than others, and the amount of exposure should be estimated. Published resources are available that provide air sampling data and compare silica dust levels from various construction activities.
- Duration of exposure—Workers who grind concrete for a full shift would be at greater risk than workers jackhammering for an hour.

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Engineering and Work Practice Controls

Engineering and work practice controls shall be used to reduce and maintain employee exposure to respirable crystalline silica to the lowest feasible level and maintain it at that level when required.

The following hierarchy of control measures must be followed:

- Elimination/substitution (e.g., using products with less silica or using work methods that would eliminate the need for surface grinding)
- Engineering controls (e.g., water, local exhaust ventilation, enclosure)
- Administrative controls (e.g., coordination of tasks with subcontractors, signage)
- The use of proper PPE such as gloves, coveralls and eye protection when exposed to silica. Personal protective equipment such as gloves, coveralls and eye protection will be used to control silica exposures.

Our firm commits to developing knowledge and expertise about these controls, and to establishing policies/procedures to protect workers from harmful exposure and to minimize reliance on respirators. Effective engineering controls such as HEPA vacuum attachments and wetting methods, which control silica dust at its source, are readily available. These controls have been proven to reduce airborne dust levels significantly when selected and operated in accordance with best practices. We know that engineering controls alone do not reduce airborne silica to safe levels; so, in most cases other control measures, including respiratory protection, will be necessary.

If we take on a job that could release an unusually high amount of dust, and we are unsure of the adequacy of our control measures, we will conduct air sampling to ensure that control methods are protective.

We will reduce or eliminate worker exposure to silica dust by selecting a combination of the following controls listed in order of preference:

- Elimination and substitution - Engineering
- Administrative - Personal protective equipment

Elimination and Substitution

We recognize the importance of planning the work to minimize the amount of silica dust generated. During the project planning phase, we will advocate for the use of methods that reduce the need for cutting, grinding, or drilling of concrete surfaces (e.g., formwork planning). Whenever possible, we will schedule work when concrete is still wet, because we know that much less dust is released at that time.

Engineering Control of Dust

Selecting an appropriate control measure depends on the specifics of the operation. In some cases, local exhaust ventilation (LEV) is more effective at controlling exposure (e.g., during grinding operations) than wetting methods. In a different application, wetting may be more effective (e.g., during cutting operations) than LEV. However, using LEV may reduce the amount of final cleaning required, as the silica dust is captured.

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Our dust control systems may employ three well-established techniques:

- Local exhaust ventilation (LEV)
- Wet dust suppression (WDS)
- Restricting or isolating the work activity with barriers or full enclosures (this may be the only option where LEV or WDS is not practical or effective)

Local Exhaust Ventilation (LEV)

When LEV is used in our work, we will employ the following systems and safe work practices:

- Vacuum attachment systems to capture and control the dust at its source whenever possible.
- Dust control systems (used regularly and well maintained).
- Grinding wheels operated at the manufacturers' recommended rpm (operating more than this can generate significantly higher airborne dust levels).
- Retrofit shrouds or exhaust cowlings for corner grinding; use manufacturer-specified rpm speeds and a well-maintained HEPA vacuum.
- Diamond stone grinders, which allow for the use of a more efficient suction casing on the grinder, whenever practicable.
- HEPA or good quality, multi-stage vacuum units approved for use with silica dust. [The vacuum units should can create a target airflow of at least 70 cfm. This should achieve a face velocity at the shroud of about 1.3 m/s (260 fpm)—the higher the face velocity, the more dust captured at source.]
- Work planning, so that concrete grinding can be completed when wet (dust release can be significantly reduced).
- Train workers and supervisors on how to properly use and maintain the equipment.

Wet methods for Dust Control

When water spray systems are used in our work, we will follow these safe work practices:

- Pneumatic grinders will be used instead of electric-powered grinders if water is the method of control.
- Pressure and flow rate of water will be controlled in accordance with tool manufacturers' specifications (for cutting saws, a minimum of 0.5 liters of water per minute should be used).
- When sawing concrete or masonry, we will use only saws that provide water to the blade.
- Wet slurry will be cleaned from work surfaces when the work is completed, using a wet vacuum or wet sweeping.

Barriers and Enclosures - When barriers or enclosures are used in our work the site foreman will determine the type and design of barrier or enclosure (based on the work activity and the work area) and ensure it is constructed in accordance with the work plan. Barriers may be simple hazard-flagging ribbon or more restrictive barriers.

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Administrative Controls

We will follow these safe work practices:

- Exposure control plans and the site risk assessment/work plan will be submitted to the general contractor prior to the start of work.
- Housekeeping Measures Put in Place to Limit Employee Exposure to Respirable Crystalline Silica – A description of housekeeping measures used to limit exposure to respirable crystalline silica must be in place (and included in the prework hazard assessment). This can include vacuuming, sweeping, wetting and other techniques used to limit the amount of respirable crystalline silica exposure during housekeeping activities. Vacuums with high-efficiency particulate air (HEPA) filters are required.
- We will establish procedures for housekeeping, restricting work areas, personal hygiene, worker training, and supervision.
- As part of our project planning, we will assess when silica dust may be generated and plan to eliminate or control the dust at the source. We recognize that awareness and planning are key factors in the prevention of silicosis.
- Warning signs will be posted to warn workers about the hazards of silica and to specify any protective equipment required (for example, respirators).
- Work schedules will be posted at the boundaries of work areas contaminated with silica dust.
- Work that generates silica dust will be conducted after hours, when access to other unprotected workers cannot be restricted.
- We will develop a site-specific exposure control plan to cover project-specific issues (e.g., scope of work, project location and site-specific hazards) and to be kept available at the worksite.

Personal Protective Equipment

Respiratory Protection

- When required, respirators must be provided to employees that are exposed to respirable crystalline silica.
- Respirators must be provided to employees who are or will be exposed to actionable levels of respirable crystalline silica. If an employee is performing a task listed in Table 1 of 1926.1153 (c) that does not require the use of a respirator then they are not required. All other tasks not covered by Table 1 must be accounted for by providing respirators if necessary.
- Link for Table 1 [https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=1270#1926.1153\(c\)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=1270#1926.1153(c))
- All workers who wear respirators will do so in adherence with our respiratory protection program.
- Respirators must be selected based upon measured exposure levels and the assigned protection factor of respirators.
- Only approved respirators will be used.
- Workers who wear respirators will be clean-shaven. Filtering face piece respirators give little or no protection to workers with beards, and even a minor growth of stubble can severely

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- reduce the effectiveness of respiratory protection.
- All workers who wear respirators will be fit-tested.
- Workers will be properly trained in the use of respirators, and a high standard of supervision, inspection, and maintenance will be followed.

Protective clothing

The Company will provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from silica contamination, ensure that silica does not contaminate workers' street clothing, and ensure that a worker does not leave a restricted area until the worker has been decontaminated.

Documentation

Records must be kept of the following:

- All workers who are exposed to respirable silica dust while on the job
- Worker education and training sessions
- Respirator fit-testing
- Equipment maintenance and repair
- Worksite inspections
- Medical surveillance when required

Annual Assessment

The written program's effectiveness must be reviewed at least annually. The written exposure control plan must be evaluated at least once per year and as necessary. Situations where reevaluation may be necessary include regulatory updates, changes in equipment and exposure incidents.

Medical Surveillance

A medical surveillance program for all employees whose exposure is equal to or exceeds the action level for 30 or more days per year is required. A medical surveillance program must be established for employees who are exposed to the action level of 8-hour TWA of 25µg/m³ of respirable crystalline silica. A baseline medical assessment must be available to exposed employees within 30 days of initial assignment unless they have previously received a suitable medical examination in the past three years. This applies to employees who would be required to wear a respirator more than 30 days per year or who are exposed to action level respirable crystalline silica for more than 30 days per year. A suitable prescreen that meets the same requirements is also acceptable.

The basics of the medical examination include:

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The Company must bear the cost. The employee needs to go to a qualified health care professional, have an exam, and obtain a written medical opinion which is shared with the Company. This written opinion needs to contain:

- The date of the exam
- A statement that the exam has specifically checked for silica exposure per the requirements of the standard.
- Any recommended limitations on the employee's exposure to respirable crystalline silica as a result of the exam's findings

The employee may learn other medical information from his or her physician during the visit, but this is private and not required to be shared with the Company.

The exam conducted by the qualified healthcare provider must include the following:

- A review of the patient's medical and work history.
- A physical examination with special emphasis on the respiratory system.
- A chest x-ray.
- A pulmonary function test administered by a certified spirometry.
- Testing for latent tuberculosis.
- Any other tests deemed appropriate by the healthcare provider.

Information required to be given to the healthcare provider:

- A copy of the OSHA respirable crystalline silica rule.
- Construction Standard - <https://www.osha.gov/silica/SilicaConstructionRegText.pdf>
- Construction Medical - <https://www.osha.gov/silica/AppendixBtosect1926.1153.pdf>
- General Industry/Maritime Standard <https://www.osha.gov/silica/SilicaGeneralIndustryRegText.pdf>
- General Industry/Maritime Medical <https://www.osha.gov/silica/AppendixBtosect1910.1053.pdf>
 - A description of the employee's former, current, and anticipated duties as they relate to the employee's occupational exposure to respirable crystalline silica.
 - The employee's former, current, and anticipated levels of occupational exposure to respirable crystalline silica.
 - A description of any personal protective equipment used or to be used by the employee, including when and for how long the employee has used or will use that equipment.
 - Information from records of employment-related medical examinations previously provided to the employee and currently within the control of the Company.

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Records

Applicable records must be kept. Accurate records of all air monitoring data, objective data, and medical surveillance shall be maintained as required by the regulation.

Training

Employees must be provided with training.

A training program shall be provided for all employees who are exposed to action level respirable crystalline silica. The training shall ensure that employees covered by the written exposure control plan can demonstrate knowledge and understanding of the health hazards associated with respirable crystalline silica, the specific tasks in the workplace that could result in exposure to respirable crystalline silica, the specific measures taken to protect employees from exposure to crystalline silica, the contents of the respirable crystalline silica rule, and the purpose of the medical surveillance program.

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Copies of this plan are located at the facility and are available to all employees.

Location(s) of plan(s): _____

Facility Information

Facility Name: _____

Mailing Address: _____

Physical address if different: _____

Owner Name: _____

Owner Address: _____

Primary Contact Name: _____
 Work Phone Number: _____
 Home Phone Number: _____
 Mobile Phone Number: _____

Secondary Contact Name: _____
 Work Phone Number: _____
 Home Phone Number: _____
 Mobile Phone Number: _____

Date of Initial Operation: _____

Site Assessment

Location - Describe where facility is located.

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Facility Description

Facilities and Equipment (examples are shown but complete per site description):

Garage for vehicle processing

Parts storage

Manufacturing Building

Spill kit/emergency equipment

Refrigerant (Freon) extractor

Parts washer

Please list:

Services:

Dismantler/Recycler

Equipment Repair

Moving Equipment

Painting/Sandblasting

Manufacturing

Please list:

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Fixed Storage - List capacity and contents of each storage container. For example, "One 6,000 gallon above ground tank containing diesel fuel." Be sure to include diesel, gasoline, waste oil, heating oil, kerosene, paint thinner and other solvents. Also describe the construction of the containers, secondary containment for each, liquid level indicators, alarms and method of corrosion protection for each container.

Non-Fixed Storage - List capacity and contents of each storage container. For example, "One 55 gallon drum for recycled oil." Be sure to indicate what each container is used for, its condition and construction and how secondary containment is provided.

Total quantity of stored materials: - The combined quantity of the materials listed above: _____ gallons

Oil spill history

Place an X on the appropriate line and proceed accordingly.

There has never been a significant spill at the above-named facility.

There have been one or more significant spills at the above-named facility. Details of such spill(s) are described below. For each spill that occurred, supply the following information:

- Type and amount of oil spilled
- Location, date and time of spill(s)
- Watercourse affected
- Description of physical damage
- Cost of damage
- Cost of clean-up
- Cause of spill
- Action taken to prevent recurrence

Describe record keeping procedures. For example, "Record keeping procedures consist of maintaining all records a minimum of three years. The following items will be kept on file: current plan, internal site reviews, training records, and documentation of any spills or maintenance conducted in regard to these sites." *Maintenance Inspection, Employee Training, and Record Keeping* logs are included in this template for your use.

Maintenance Coordinator responsibilities include implementation of preventative maintenance programs and oversight of on-site inspections.

[illegible]

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Record Keeping of Incidental Spills

Record Keeper Name:

Record Keeper responsibilities include maintaining records of incidents, updating the plan as necessary and ensuring reports are submitted to the proper authorities when necessary.

Appendices

Site map - Attach a site map as Appendix A to this plan. You may attach an existing site map or create your own. If you use an existing map, be sure that the items listed below are included. If you need to create a site map, use a large enough piece of paper so all site plan elements may be seen and try to keep the map to a scale (e.g. 1" = 20'. The following instructions should guide you step-by-step. Please use a straight edge (ruler) while creating the sketch.

- The sketch should be oriented as if you were in a plane looking down on your property (an aerial view), with North at the top (draw an arrow indicating north).
- Draw and label all roadways surrounding the work site.
- Draw and label all facilities within the work site as close proportionately as possible.
- Draw an arrow(s) pointing in the direction of downhill flow of water when it rains.
- Draw the location and general layout of all vehicles associated with the work site.
- Label any rivers or waterways surrounding the work site.
- Draw and label all methods of entry to the work site.
- Draw and label the location of all fuel containment facilities.
- Draw and label the location of all in-place spill prevention, control and countermeasure devices.

Other attachments - List any additional information to be attached as Appendix B, C, D, etc. Label and staple the attachments to the end of this plan.

Appendix A: Site Map

Appendix B: Emergency Response Posting Locations

Appendix C: _____

Appendix D: _____

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Management Approval

I certify that I have personally examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals responsible for obtaining this information, the information submitted is true, accurate and complete.

_____	_____
Signature	Title
_____	_____
Printed name	Date

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Purpose

The purpose of this plan is to document spill prevention and response requirements. Each Company work site will develop a spill prevention and response plan based on the requirements and template provided.

Scope

This procedure applies to all Company operations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Requirements

Each work site spill prevention and response plan shall contain the following requirements.

- Taking Inventory of Hazardous Substances and Toxic Chemicals - A material inventory identifying hazardous substances and toxic chemicals should be part of the risk identification and assessment plan and is needed to determine the potential for spills.
- Proper Spill Kits Being Readily Available - COMPANY provides spill kits that are appropriate for the chemicals that have the potential to be spilled. Spill kits are readily available and easily accessible.
- Proper Storage to Reduce the Likelihood of a Spill – COMPANY must store chemicals properly to minimize the likelihood for a spill to occur. The program must state that where possible, chemicals stored be kept in closed containers and not exposed to potential stormwaters.
- Incident Reporting - Spills must be reported immediately. Spills must be reported immediately to the Company supervision. The Company reports to environmental authorities the type of chemical spilled and the quantity, when required to do so by regulatory or statutory requirements in the timing and manner as required by the governing authority for the spilled material. This can include phone calls, emails, databases, etc.
- Employee Training on Appropriate Procedures to Follow in the Event of a Spill - Affected employees must be trained on the appropriate procedures to be followed in the event of a spill. The training includes, at a minimum, the materials available for use, proper waste disposal, and the communication procedures the Company utilizes. All training is to be documented.
- Areas where chemicals may be used or stored must be maintained using good housekeeping best management practices. This includes, but is not limited to clean and organized storage, labeling and secondary containment where necessary.
- The Company shall ensure the availability of adequate spill response supplies by periodic inspection to assess their availability and adjust the inventory as necessary.

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This program applies to all Groome facilities that respond to emergency spills of hazardous chemicals that are capable of causing injury or health impairment.

Every Groome facility must prepare to manage incidents that involve spills or releases of hazardous chemicals as required by federal/state Department of Transportation (DOT), Environmental Protection Agency (EPA), and Occupational Safety and Health Administration (OSHA) regulations. The requirements of this program shall be implemented prior to the beginning of any emergency response operations whether immediate or anticipated. The written program should be available to employees, their representatives and regulatory agencies.

The Groome Emergency Response to Spills and Releases Program includes the following:

- Designation of a person who is responsible for administering the program, pre-emergency planning and coordination with outside parties.
- Designation of an emergency response coordinator, including duties and responsibilities.
- Emergency Action Plan.
- Spill prevention and emergency recognition.
- Emergency alerting and responding to spills, including personnel responsibilities, situation assessment, emergency shutdowns and communication.
- Chemical spill procedures, including initial entry, monitoring and medical duties.
- Description of procedures for decontamination.
- Requirements for training of employees involved in the emergency response team.
- Medical surveillance.
- Requirements of personal protective equipment.
- Post emergency response operations.
- Critiques of response and clean up.
- Equivalent programs.

The following sections explain how Groome addresses each of these requirements.

PROGRAM ADMINISTRATOR

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The facility manager, or designee, is responsible for the Emergency Response to Spills and Releases program. This person shall:

- Oversee the entire program.
- Plan and coordinate with local emergency response agencies; for example, fire, police, and medical personnel. These agencies should be made aware of our internal emergency response procedures.
- Ensure all employees involved in the response team are trained regarding emergency spill response.

EMERGENCY RESPONSE COORDINATOR

Groome must ensure that at all times there will be at least one employee either on the facility premises or on call with the responsibility for coordinating emergency response measures. This Emergency Response Coordinator (ERC) must be thoroughly familiar with all aspects of the facility's emergency response plan, all operations and activities at the facility, the location and characteristics of hazardous materials that are handled.

The ERC is the senior emergency response official for the Groome facility. All company emergency responders and their communications shall be coordinated and controlled through the ERC. The ERC has responsibility for:

- Identifying all hazardous substances and conditions present, site analysis, engineering controls, maximum exposure limits, and material handling procedures.
- Determining and monitoring appropriate levels of PPE, including respiratory protection.
- Assuring security and control of emergency response site.
- Providing for back-up personnel for assistance, rescue and medical support.
- Initiating decontamination procedures.

EMERGENCY ACTION PLAN

Each Groome facility has an Emergency Action Plan that covers designated actions employers and employees must take to ensure employee safety from emergencies that can occur. The facility's Emergency Action Plan shall serve as a guide, under this program, for procedures involving:

- Emergency alerting.
- Evacuation routes and methods.

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- Places of refuge and safe distances.
- Assembly areas and accounting for employees after evacuation.

SPILL PREVENTION AND EMERGENCY RECOGNITION

Identify the potential for spills or releases of hazardous chemicals that may occur at the facility, and which may:

- Require a coordinated response from employees or other designated responders from outside the spill area.
- Require an evacuation from the spill/release area or adjacent areas; or
- Create conditions in the spill/release area that are life or injury threatening, pose a fire or explosion hazard, present an oxygen deficient atmosphere or cause high levels of a toxic substance.

Minimize potential spills by careful handling and proper storing of chemicals. Only trained employees are allowed to handle hazardous materials. Good housekeeping best management practices will help prevent spills.

Make sure that spill kits are readily available, easily accessible, and appropriate for the chemicals that have the potential to be spilled.

Employees (who have received at least awareness-level training) who witness or discover a non-routine spill or release shall report this to a supervisor.

EMERGENCY ALERTING AND RESPONDING TO SPILLS

Means for Reporting an Emergency

Whenever an emergency develops, or the threat of an emergency which may cause substantial harm or damage, a notification process must begin. Each facility shall have a means of notifying all employees of the type of emergency for which they must take action. Proper communication measures must be in place and initiated upon a spill or release of materials.

In order to call an outside agency for assistance, an emergency call sheet should be available at each telephone. All employees must be instructed in proper emergency calling procedures.

The emergency call sheet next to the phone should include:

- The fire department phone number.
- The ambulance company phone number.

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- The police department phone number.
- Location of the emergency, including directions to the facility.

Whenever there is an imminent or actual emergency spill or release, the ERC must immediately:

- Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel.
- Notify appropriate local or state agencies with designated response roles if their help is needed.
- Whenever there is a spill, release, fire or explosion, immediately identify the character, exact source, amount and area of the extent of the released material. This can be accomplished by interviews with employees, by observation, a review of the facility records, manifests or by chemical analysis.
- Assess possible hazards to human health or the environment that may result from a spill, release, fire or explosion. Consider the effects of any toxic, irritating or asphyxiating gases that are generated or the effects of any hazardous surface water run-off from water or fire control agents.
- In the case of a spill, release, fire or explosion, which could threaten human health or the environment outside of the facility, the ERC must notify the appropriate local and state authorities and be available to help officials decide whether local areas should be evacuated.
- Take all reasonable measures necessary to ensure that spills, releases, fires and explosions do not occur, recur or spread to other hazardous materials at the facility. Include in these measures stopping processes and operations, collecting and containing releases and removing and isolating containers. If the facility stops operations in response to a spill, release, fire or explosion, the ERC should monitor the operation for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment.
- Ensure that no waste that may be incompatible with the spilled or released material is treated, stored or disposed of until cleanup procedures are complete, and all emergency equipment listed in the response plan is ready and fit for intended use before operations are resumed.

The spill assessment and response will be under the direction of the on-duty ERC. The ERC will:

- Assess the nature of the spill
 - Identify the type of material
 - Estimate size of the spill. Materials or spill kits must be adequate for any anticipated spills.

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- Determine if the spill requires emergency response or if it is a routine occurrence that can be handled by employees working in the spill/release area that can absorb, neutralize or otherwise control the hazardous material at the time of its release.
- Determine if the facility is equipped to handle the spill. If not, evacuate the facility area and notify local or state authorities.
- Evacuate personnel as necessary.
- Remove all ignition sources and turn off all heat sources particularly for spills or releases of flammable materials.
- Activate the emergency response team.

CHEMICAL SPILL PROCEDURES

Follow these procedures in the event of a chemical spill:

- Report the incident to the ERC who will subsequently notify the Emergency Response Team.

The ERC will then:

- Take steps to protect personnel.
- Keep nonessential personnel out of the area.
- Identify the spilled material.
- Estimate the quantity of spilled material.
- Determine life-threatening, property-threatening and environmental impact potential.
- Initiate evacuation of building occupants, if necessary.
- Take steps to eliminate ignition sources if the spilled material is flammable.
- Obtain the Safety Data Sheet for the spilled material.
- Determine the need to have an outside party, such as an emergency response contractor, clean up the spill.
- Direct cleanup operations, determine the level of personal protective equipment and respiratory protection and decide on appropriate cleanup materials and procedures.

Initial Entry

Upon initial entry, representative air monitoring shall be conducted to identify any IDLH condition,

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exposure over permissible exposure limits or published exposure levels, exposure over a radioactive material's dose limits or other dangerous condition such as the presence of flammable atmospheres, oxygen-deficient environments.

- Gather cleanup equipment. If required, use nonsparking tools for cleanup. Wear appropriate personal protective equipment (PPE) as defined in the Safety Data Sheet. Do not clean spill/leak if you are in personal danger or by yourself. The "buddy" system is required.
- Isolate and contain the spill/leak with a dike and control it at its source (e.g. close the valve, plug a leak, bandage a leaking hose, shut down a pump, tape the container, etc.).
- Keep spilled materials out of drains by protecting with absorbent materials or booms.
- Follow Safety Data Sheet for specific spill cleanup instructions.
- Remove spill materials and rinse water accumulated in containment areas using a portable vacuum unit or suction pump, and then discharge the contents into a DOT-approved waste drum. Ensure that pumps/vacuums are driven by explosion proof motors or pneumatically. A blanket of fire fighting foam (Triple F foam) may be applied to control vapors. If using sorbents to absorb a spill, properly package and label spill materials absorbed.
- The ERC will then verify complete spill collection and neutralization as well as the absence of hazardous airborne contaminants.

Monitoring

Monitoring shall be performed where there may be a question of employee exposure to hazardous concentrations of hazardous substances in order to assure proper selection of engineering controls, work practices and personal protective equipment so that employees are not exposed to levels which exceed permissible exposure limits, or published exposure levels if there are no permissible exposure limits, for hazardous substances.

Air monitoring shall be used to identify and quantify airborne levels of hazardous substances and safety and health hazards in order to determine the appropriate level of employee protection needed on site.

Medical Duties

Those qualified and authorized employees that are required to perform medical duties should do so as long as they can perform their duties safely without severe personal risk. These employees should be trained in first aid and cardiopulmonary resuscitation (CPR). The overall responsibility for medical duties and rescue is that of outside emergency response agencies such as the fire department.

POST-EMERGENCY RESPONSE OPERATIONS

Upon completion of the emergency response, if it is determined that it is necessary to remove hazardous substances, health hazards and materials contaminated with them (such as contaminated soil or other

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elements of the natural environment) from the site of the incident, the employer conducting the clean-up shall comply with the following:

- Remove spill materials and rinse water accumulated in containment areas using a portable vacuum unit or suction pump, and then discharge the contents into a DOT-approved waste drum. Ensure that pumps/vacuums are driven by explosion proof motors or pneumatically. A blanket of fire fighting foam (Triple F foam) may be applied to control vapors. If using sorbents to absorb a spill, properly package and label spill materials absorbed.
- The ERC will then verify complete spill collection and neutralization as well as the absence of hazardous airborne contaminants.
- Decontaminate spill response tools and materials and return them to their proper location.
- Dispose of waste according to Federal, State, and local requirements.
- Replace spill cleanup materials used including PPE.
- Complete and forward the spill report form EHS 105A.

Where the clean-up is done on GROOME property using GROOME employees, such employees shall have completed the training requirements of the following: 29 CFR 1910.38(a); 1910.134; 1910.1200, and other appropriate safety and health training made necessary by the tasks that they are expected to be performed such as personal protective equipment and decontamination procedures.

All equipment to be used in the performance of the clean-up work shall be in serviceable condition and shall have been inspected prior to use.

DECONTAMINATION

Decontamination consists of physically removing contaminants or changing their chemical nature to insignificant substances. How extensive decontamination must be depends on a number of factors, the most important being the type of contaminants involved. The more harmful the contaminant, the more extensive and thorough decontamination must be. Less harmful contaminants may require less decontamination.

Combining decontamination, the correct method of removing personal protective equipment and the use of site work zones minimizes cross contamination from protective clothing to wearer, equipment to personnel, and one area to another. The exact procedure to use must be determined after evaluating a number of factors specific to the incident.

Decontamination procedures should be implemented and communicated to employees before any employee or equipment may enter areas on site where potential for exposure to hazardous substance exists.

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- Standard operating procedures shall be developed to minimize employee contact with hazardous substances or with equipment that has contacted hazardous substances.
- Employees leaving a contaminated area shall be appropriately decontaminated; contaminated clothing and equipment leaving a contaminated area shall be appropriately decontaminated or disposed.
- Decontamination procedures shall be monitored by the site safety and health supervisor to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies.

Decontamination Location

Decontamination shall be performed in geographical areas that will minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment.

All equipment and cleaning solutions used for decontamination shall be decontaminated or disposed of properly.

Personal Protective Clothing and Equipment

Protective clothing and equipment shall be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness.

Employees whose non-impermeable clothing becomes wetted with hazardous substances shall immediately remove that clothing and proceed to shower. The clothing shall be disposed or decontaminated before it is removed from the work zone.

Commercial Laundering

Commercial laundries or cleaning establishments that decontaminate protective clothing or equipment shall be informed of the potentially harmful effects of exposures to hazardous substances.

Showers/Change Rooms

Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, they shall be provided and meet the requirements of 29 CFR 1910.141.

TRAINING

All members of the emergency response team shall be trained on proper spill prevention and response procedures to a level of competence in the recognition of health and safety hazards to protect themselves and other employees. This should include training in the:

- Methods used to minimize the risk from safety and health hazards.

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- Safe use of control equipment and what equipment is available for use.
- Selection and use of personal protective equipment.
- Safe operating procedures to be used at the incident scene.
- Techniques of coordination and communication with other employees to minimize risks.
- Appropriate response to overexposure from health hazards or injury to themselves or other employees.
- Recognition of subsequent symptoms that may result from over exposures.
- Proper waste disposal.

Employees who, in the course of their regular job duties, work with and are trained in the hazards of specific hazardous substances, and who will be called upon to provide technical advice or assistance at a hazardous substance spill or release incident, shall receive training or demonstrate competency in the area of their specialization annually.

Training shall be based on the duties and function to be performed by each responder of an emergency response organization. The skill and knowledge levels required for all new responders, those hired after the effective date of this standard, shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Employees who participate, or are expected to participate, in emergency response, shall be given training in accordance with the following:

First Responder Awareness Level

First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:

- An understanding of what hazardous substances are, and the risks associated with them in an incident.
- An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
- The ability to recognize the presence of hazardous substances in an emergency.
- The ability to identify the hazardous substances, if possible.
- An understanding of the role of the first responder awareness individual in the employer's emergency response plan including site security and control.

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- The ability to realize the need for additional resources and to make appropriate notifications to the communication center.

First Responder Operations Level

First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading and prevent exposures. First responders at the operational level shall have received **at least eight hours of training** or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level and the employer shall so certify:

- Know the basic hazard and risk assessment techniques.
- Know how to select and use proper personal protective equipment provided to the first responder operational level.
- Understand basic hazardous materials terms.
- Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit.
- Know how to implement basic decontamination procedures.
- Understand the relevant standard operating procedures and termination procedures.

Hazardous Materials Technician

Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level does in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received **at least 24 hours of training** equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know how to implement the emergency response plan.
- Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment.
- Be able to function within an assigned role in the Incident Command System.
- Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician.

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- Understand hazard and risk assessment techniques.
- Be able to perform advance control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit.
- Understand and implement decontamination procedures.
- Understand termination procedures.
- Understand basic chemical and toxicological terminology and behavior.

Hazardous Materials Specialist

Hazardous materials specialists are individuals who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician; however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain.

Hazardous materials specialists shall have competency through education and experience in the following areas and the employer shall so certify:

- Know how to implement the local emergency response plan.
- Understand classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment.
- Know the state emergency response plan.
- Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist.
- Understand in-depth hazard and risk techniques.
- Be able to perform specialized control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available.
- Be able to determine and implement decontamination procedures.
- Have the ability to develop a site safety and control plan.
- Understand chemical, radiological and toxicological terminology and behavior.

On Scene Incident Commander

Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive **at least 24 hours of training** equal to the first responder operations level

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and in addition have competency in the following areas and the employer shall so certify:

- Know and be able to implement the employer's incident command system.
- Know how to implement the employer's emergency response plan.
- Know and understand the hazards and risks associated with employees working in chemical protective clothing.
- Know how to implement the local emergency response plan.
- Know of the state emergency response plan and of the Federal Regional Response Team.
- Know and understand the importance of decontamination procedures.

Trainers

Trainers who teach any of the above training subjects shall have satisfactorily completed a training course for teaching the subjects they are expected to teach, or they shall have the training and/or academic credentials and instructional experience necessary to demonstrate competent instructional skills and a good command of the subject matter of the courses they are to teach.

Refresher Training

Those employees who are trained in accordance with this section shall receive annual refresher training of sufficient content and duration to maintain their competencies or shall demonstrate competency in those areas at least yearly.

A statement shall be made of the training or competency, and if a statement of competency is made, the employer shall keep a record of the methodology used to demonstrate competency such as passing a test, participating in a drill or successfully responding to an emergency spill in the past year.

Important Training Factors

- Employees who are assigned as emergency responders to contain or clean-up spills/releases of materials/chemicals are required to have a minimum of 24 hours of training prior to commencement of any response activity.
- Employees who are assigned as emergency responders to secure the area of a spill/release, but who do not participate in the containment or clean-up, are required to have a minimum of 8 hours of training prior to commencement of any response activity.
- Employees who neither secure, contain, nor clean, but who are assigned to initiate a request for a spill/response must be familiar with the contents of this program prior to their assignment of these duties.

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- The Emergency Response Coordinator is required to have at least as much training as the employee he/she supervises, be familiar with all aspects of this program and be knowledgeable of the local municipal response plan prior to the commencement of any response activity.
- Refresher training is completed annually by all emergency responders to maintain competency in implementation of this program.
- Certificates are issued to employees who successfully complete the required training. Copies of these certificates are maintained in the employee's training file.
- Employees who are assigned to respond to non-emergency spills or releases below their threshold quantities are required to receive training as required under the Hazard Communication Program.

MEDICAL SURVEILLANCE AND CONSULTATION

Members of an organized and designated HAZMAT team and hazardous materials specialist shall receive a baseline physical examination and be provided with medical surveillance as required.

Any emergency response employee who exhibits signs or symptoms that may have resulted from exposure to hazardous substances during the course of an emergency incident, either immediately or subsequently shall be provided with medical consultation.

PERSONAL PROTECTIVE EQUIPMENT

Two basic objectives of any PPE program should be to protect the wearer from safety and health hazards, and to prevent injury to the wearer from incorrect use and/or malfunctions of the PPE. To accomplish these goals, a comprehensive PPE program should include hazard identification, medical monitoring, environmental surveillance, selection, use, maintenance and decontamination of PPE and its associated training. As required by OSHA 1910.120, PPE must be selected which will protect employees from the specific hazards that they are likely to encounter during their work on-site. Refer to EHS 800, PPE and Hazard Assessment and EHS 801, Respiratory Protection for further discussion factors affecting the use of PPE.

In many instances, protective equipment materials cannot be found that will provide continuous protection from the particular hazardous substance. In these cases, the breakthrough time of the protective material should exceed the work duration.

The following are guidelines that can be used to begin the selection of the appropriate PPE. As noted above, the site information may suggest the use of combinations of PPE selected from the different protection levels (i.e., A, B, C, or D) as being more suitable to the hazards of the work. It should be cautioned that the listing below does not fully address the performance of the specific PPE material in relation to the specific hazards at the job site, and that PPE selection, evaluation and re-selection is an ongoing process until sufficient information about the hazards and PPE performance is obtained.

Levels of Personal Protective Equipment

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Personal Protective Equipment is divided into four categories based on the degree of protection afforded.

Level A - Is not used at GROOME facilities. It is only used when the greatest level of skin, respiratory, and eye protection is required.

Level B - Is used when the highest level of respiratory protection is necessary, but a lesser level of skin protection is needed.

Level C - Is used when the concentration(s) and type(s) of airborne substance(s) is known and the criteria for using air-purifying respirators are met.

Level D - Is used when no respiratory protection is required.

The following constitute Level D equipment; it may be used as appropriate:

- 1) Coveralls
- 2) Gloves
- 3) Boots/shoes, chemical-resistant steel toe and shank
- 4) Boots, outer, chemical-resistant (disposable)
- 5) Safety glasses or chemical splash goggles
- 6) Hard hat
- 7) Escape mask
- 8) Face shield

The types of hazards for which levels A, B, C, and D are appropriate are described below:

Level B protection should be used when:

- 1) The type and atmospheric concentration of substances have been identified and require a high level of respiratory protection, but less skin protection.
- 2) The atmosphere contains less than 19.5 percent oxygen; or
- 3) The presence of incompletely identified vapors or gases is indicated by a direct-reading organic vapor detection instrument, but vapors and gases are not suspected of containing high levels of chemicals harmful to skin or capable of being absorbed through the skin.

Note: This involves atmospheres with IDLH concentrations of specific substances that present severe

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inhalation hazards and that do not represent a severe skin hazard; or that do not meet the criteria for use of air-purifying respirators.

Level C - Level C protection should be used when:

- 1) The atmospheric contaminants, liquid splashes or other direct contact will not adversely affect or be absorbed through any exposed skin.
- 2) The types of air contaminants have been identified, concentrations measured, and an air-purifying respirator is available that can remove the contaminants; and
- 3) All criteria for the use of air-purifying respirators are met.

Level D - Level D protection should be used when:

- 1) The atmosphere contains no known hazard; and
- 2) Work functions preclude splashes, immersion or the potential for unexpected inhalation of or contact with hazardous levels of any chemicals.

Note: As stated before, combinations of personal protective equipment other than those described for Levels A, B, C and D protection may be more appropriate and may be used to provide the proper level of protection.

PERIODIC REVIEW

On an annual basis, the ERC will review this plan. It will also be reviewed when procedures, responsibilities and/or processes change. The ERC will document any changes to the plan and employees will be retrained.

FOLLOW UP AND CRITIQUE

Immediately after a spill or release situation or a training exercise, the actions taken shall be critiqued and documented. A written report will be prepared by the ERC from this critique with any recommendations.

EQUIVALENT PROGRAM

Locations may use the local emergency response plan or the state emergency response plan, or both, as part of their emergency response plan to avoid duplication. In all cases, the equivalent program must meet all core requirements of this emergency response to spills and releases program.

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PURPOSE

The Company "STARS" behavior-based safety (BBS) program is an education and observation process used to improve safety and reduce risk in the workplace. This process uses a proactive approach and is intended to communicate to employees the elements and the procedures of Behavior-Based Safety that will assist in reducing at-risk behaviors which in turn reduce injuries/accidents in our workplaces.

SCOPE

The Company "STARS" BBS program applies to all staff. Employees are permitted to participate in BBS initiatives already in place at customer locations if required by the customer. Employees are requested to participate in the Behavior-Based Safety process and follow the process guidelines.

Requirements

Safety awareness principles are the foundation of the Company Behavior-Based Safety process. The key concepts teach employees to recognize hazards when they may be in one of the following states:

- Rushing
- Frustration
- Fatigue
- Complacency (which can cause or contribute to critical errors)
- Eyes not on task
- Mind not on task
- Line of fire
- Loss of balance/traction/grip (which in turn increases the risk of injury)



Pre-Task Analysis is a process to evaluate the work environment by performing a Job Safety Analysis (JSA) of each job. The purpose of which is to eliminate or control all hazards that may be encountered to complete the job. This process is included in the Behavior-Based Safety process to establish the correct habits and work procedures in order to reduce at-risk behaviors and conditions.

The observation process is designed to raise safety awareness and provide a feedback mechanism for management to make changes in design, process or procedure in order to reduce at-risk behaviors. The key to this process is raising awareness of behavior through observation and feedback. The process has five key elements:

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Stop – At Groome, we not only have the right to stop work when we perceive something to be unsafe, we **expect** each employee to stop the job when they perceive something to be unsafe. The newest or most inexperienced employee has the same right and responsibility to exercise Stop Work Authority (SWA) as the most senior, experienced executive of the company. No employee will be retaliated against for exercising SWA. Even if the observed act or condition turns out to be the safest way to perform the task, this reality shall not prevent our employees from exercising SWA.

Take 5 – We recognize our own human tendencies to become distracted and complacent, particularly when working for an extended period. As such, we are empowered to “take five” minutes as often as necessary to

refocus our team’s attention and our own to help maintain situational awareness of the hazards around us. These five minutes afford us the time needed to observe our work area and to assess and reassess the hazards around us to confirm that effective risk control measures are fully implemented.

Act – Once we see something at risk, we take immediate action by engaging the relevant stakeholders who can address it. We relentlessly pursue such action until exposure is eliminated or reduced as low as reasonably practicable. We possess the character to make our work area as safe as possible even if no one notices because we understand that a safe workplace starts with our own actions.

Record – We share our observations and corrective actions through documentation using the “STARS” survey system. We understand that documenting our actions helps the company to track, to trend, and to share best practices and lessons learned to prevent incidents, injuries, and illnesses. Recording our observations is in no way “telling on” or “blaming” our fellow employees. Rather, we recognize that capturing the actions we take helps to ensure that everyone gets home safely.

Start – We resume work cautiously and are always mindful of the potential for changing circumstances that would warrant our repeating this process as often as necessary. By continually perfecting this exercise, we shine brightly as safety STARS!

Responsibilities

OVERSIGHT

The manager/supervisor has these oversight responsibilities:

- Coach observers and develop action plans to ensure continuous improvement.
- Ensure that all employees are trained on the Behavior-Based Safety elements.

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- Maintain communication with workforce by channeling information in a timely manner (feedback).
- Collect and review process modification change requests from employees.

Each employee plays a specific role in the Behavioral Based Safety process. These roles include observee, observer, supervisor, manager and safety manager.

PERSON BEING OBSERVED

- Be willing to be observed.
- Be open and cooperative.
- Avoid being defensive.
- Participate in problem-solving meetings.
- Be familiar with the Behavior-Based Safety process.

PERSON PERFORMING THE OBSERVATION

- Learn the Behavior-Based Safety process and the benefits of reducing at-risk behaviors.
- Promote the Behavior-Based Safety process.
- Make observing proactive.
- Be open to coaching.
- Be courteous and helpful.
- Assist workers by offering suggestions to safely perform a task or help them with a task if necessary.
- Communicate with the workers being observed.
- Give constructive feedback after observations.
- Stress the safe behaviors before the at-risk behaviors.
- Offer and work towards solutions of problems found.
- Record a comment for every recorded "at-risk" to include what and why. Make quality observations, concentrating on quality comments.

MANAGER

- Actively promote and participate in the behavior safety process by supporting the goals and objectives of the Behavior-Based Safety process.
- Ensure that all employees are aware of what is expected of them regarding the BBS process.
- Encourage employees to participate in observations so that incidents/injuries are reduced in the workplace.
- Provide necessary resources to keep process productive.
- Attend safety meetings and offer feedback on areas of improvement.

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SUPERVISOR

- Actively promoting and participating in the Behavior-Based Safety process by reviewing BBS Observation Forms turned in at least weekly and giving feedback, completing corrective actions needed, etc.
- Refraining from using result from the Behavior-Based Safety process in a punitive manner.
- Assisting in problem solving and completing corrective actions in a timely manner.
- Understanding the behavior safety process and the benefits of reducing at-risk behaviors.

EHS MANAGER

- Support the goals and objectives of the Behavior-Based Safety process.
- Encourage, promote, provide technical support and assist in acquiring the resources needed for the Behavior-Based Safety process.
- Address the concerns and suggestions of field personnel.
- Track and trend survey results and ensure corrective/preventive actions are completed.
- Perform evaluation report analysis

“STARS” Observations

Company believes that effective safety conversations are at the core of our safety culture. After exercising the “Stop” and “Take 5” aspects of the acronym to look around at the working conditions of the employees’ work environment, the next step of “Act” and “Record” involves employees engaging in an effective safety conversation before they “Start” again by resuming work.

An effective safety conversation occurs when two or more employees seek to either reinforce safe behaviors or conditions or to address unsafe or “at risk” behaviors or conditions. To communicate effectively the person initiating the conversation (aka the “Observer”) should be prepared via training to conduct the conversation according to the provided training technique with the “Observed Employee(s).”

- Observer: The Observer must engage the person they observed in a professional and courteous manner with the attitude of wanting to contribute to continuously improving the safety culture. Whether that conversation is to recognize the observed employee’s safe behavior or to correct their at risk behavior, the Observer should seek to build a positive connection with the observed person in seeking to prevent an incident or injury.
- Observed Employee: Likewise, the observed employee must be trained in the STARS observation process

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to understand that the person observing them is genuinely concerned for their well-being and not seeking to embarrass them or to get them in trouble. The observed person should remain open-minded and avoid defensiveness and listen and respond courteously to the Observer's questions and remarks.

An effective conversation should conclude with the Observer gaining commitment from the Observed Employee to continue doing the safe behavior or to correct the At-Risk behavior or condition.

This conversation and commitment should be recorded via the "STARS" survey form app/link: (See form example in Appendix A).

- o English Version - <https://www.surveylegend.com/s/4i11>
- o Spanish Version - <https://www.surveylegend.com/s/4i17>

The Observer is to be identified by name on the STARS form only for the purpose of recognizing their effort to have an effective safety conversation and to provide incentive rewards to them.

The Observed Employee's name should not be recorded on the form, so as to prevent or create a hostile work culture of looking to find and report faults in others.

Observation Trend Analysis

The EHS Department, as well as the company as a whole, will compare these measurements and track these results by an acceptable method so that numerical and statistical comparisons can be made over time.

Once trend analysis is complete, appropriate action plans must be developed to address at-risk behaviors. Action planning will include:

- o Evaluate unsafe behaviors from trend analysis and prioritize
- o Develop action plan for unsafe behaviors based on comments and feedback from data sheets
- o Designate responsible parties and timeframes within the action plan

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- o Define who is responsible for action planning
- o Ensure management support

“STARS” Incentive Program

All Company employees are encouraged and required to report incidents, injuries, and illnesses on the job. The Company shall not take any negative action against an employee for reporting any such incidents, injuries, and/or illnesses.

While Company seeks to prevent all work-related injuries and illness for all employees, the company recognizes that field-based employees are much more likely to incur serious injury statistically than office-based employees due to the inherent risk associated with their work responsibilities.

“STARS” Observation-Based “Safety Days” Rewards

- All Company field-based employees shall receive the following for each of the two types of recorded “STARS” safety observations:
 - o 1 ticket for each recorded/submitted “positive” observation
 - o 2 tickets for each recorded/submitted “at risk” observation
- For an employee to receive credit for the observation, they must record and submit their observation using via the “STARS” observation survey application link.
- Company field-based employees will be able to use their accumulated tickets for a chance to win prizes during their respective regional “Safety Days” event. The more tickets an employee accumulates, the better chances they have at winning a prize of their choosing.
- All observations must be recorded and submitted prior to their respective “Safety Days” event to receive a ticket.

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Training

Appropriate staff shall be trained in the contents of this procedure and the observation process. The training program shall:

- Include managers and supervisors
- General employee awareness as related to how decisions affect behavior and the impact those decisions have on working safely.
- Be conducted using classroom, field, and/or computer-based training (CBT) remote learning settings.

Types of training shall include:

- Management training
- New employee training
- Refresher (annual) training for all participants

Training elements will include:

- Program objectives and incident statistics reviewed
- How to conduct/document safety observations
- What do the behaviors mean
- Feedback training and role play (mentoring and coaching)
- Employees should be aware they may be requested to be observed at any time
- Documentation of training

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Purpose

The Stop Work Authority process involves a stop, notify, correct and resume approach for the resolution of a perceived unsafe condition, act, error, omission or lack of understanding that could result in an undesirable event. All Company employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health, safety or environmental risks exist.

Scope

This program applies to all Company projects and operations.

Key Responsibilities

- Employees are responsible to initiate a Stop Work Intervention when warranted and management is responsible to create a culture where SWA is exercised freely.
- Supervisors are responsible to ensure a culture is created where SWA is exercised and honored freely to resolve issues before operations resume and recognize proactive participation.
- Management must establish and support clear expectations to exercise SWA, create a culture where SWA is exercised freely and hold those accountable that chose not to comply with established SWA policies.

Stop Work Authority Procedure

- When an unsafe condition is identified, the Stop Work Intervention will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected personnel and supervisors of the stop work issue, correct the issue and resume work when safe to do so.
- No work will resume until all stop work issues and concerns have been adequately addressed.
- Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated by the host or by Company.

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Follow-Up

- All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.
- Stop Work reports shall be reviewed by supervisors in order to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learning.
- It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.

Training

Employees shall receive Stop Work Authority training before their initial assignment. The training will be documented including the employees name, the dates of training and subject matter.

Training Acknowledgement

I, (Print Name) _____ acknowledge and fully understand the Stop Work Authority process. As an employee of the Company I reserve the right to invoke the Stop Work Authority if at any time I perceive an unsafe condition, witness an unsafe act or have a lack of understanding of the job at hand.

I fully understand the Stop Work Authority process, which constitutes a 4-step procedure to stop work, notify my supervisor of the unsafe condition, correct the unsafe condition and resume work once all hazards have been effectively controlled.

If Stop Work Authority is implemented on any job, a debriefing shall be held amongst the affected crew to ensure everyone fully comprehends the issue and the corrective measures that were put in place.

Signature _____ Date _____

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General Requirements

Proper Permits shall be obtained prior to the commencement of any demolition activities. Demolition

Permits are to be readily available on site for review.

Protection of adjacent structures, property, and sidewalks is to be accomplished prior to commencement of demolition activities.

Proper personal protective equipment is to be worn throughout demolition process including but not limited to hard hats, work boots, glasses, and fall protection.

Dust control should be implemented to eliminate hazards where dust presents a health hazard, environmental hazard, damage to property.

Any entry point or gate openings are to be closed and secured during all demolition activities.

Demolition debris is not to remain on any portion of a roof top or sidewalk bridge structure. These areas are to be cleaned daily.

Preparatory Operations:

Prior to permitting employees to start demolition operations, an engineering survey shall be made by a competent person, of the structure to determine the condition of the framing, floor, and walls, and possibility of unplanned collapse of any portion of the structure. Any adjacent structure where employees may be exposed shall also be similarly checked. Written documentation that such a survey has been performed will be available on the job site.

When employees are required to work within a structure to be demolished which has been damaged by fire, flood, explosion or other cause, the walls or floor shall be shored or braced.

All electric, gas, water, steam, sewer, and other service lines shall be shutoff, capped, or otherwise controlled, outside the building line before demolition work is started. In each case, any utility company, which is involved, shall be notified in advance.

- If it is necessary to maintain any power, water or other utilities during demolition, such lines shall be temporarily relocated, as necessary, and protected.
- It shall also be determined if any type of hazardous chemicals, gases, explosive, flammable materials, or similarly dangerous substances have been used in any pipes, tanks, or other equipment on the property. When the presence of any such substances is apparent or suspected, testing and purging shall be performed and the hazard eliminated before demolition is started.

Where a hazard exists from fragmentation of glass, such hazards shall be removed.

Where a hazard exists to employees falling through wall openings, the opening shall be protected to a height of approximately 42 inches.

When debris is dropped through holes in the floor without the use of chutes, the area onto which the material is dropped shall be completely enclosed with barricades not less than 42 inches high and not less than 6 feet back from the projected edge of the opening above. Signs, warning of the hazard of falling materials, shall be posted at each level. Removal shall not be permitted in this lower area until debris handling ceases above.

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All floor openings, not used as material drops, shall be covered over with material substantial enough to support the weight of any load, which may be imposed. Such material shall be properly secured to prevent its accidental movement.

ALL COVERS SHALL BE MARKED "FLOOR HOLED DO NOT REMOVE COVER."

Except for the cutting of holes in floors for chutes, holes through which to drop materials, preparation of storage space, and similar necessary preparatory work, the demolition of exterior walls and floor construction shall begin at the top of the structure and proceed downward. Each story of exterior wall and floor construction shall be removed and dropped into the storage space before commencing the removal of exterior walls and floors in the story next below.

Employee entrances to multi-story structures being demolished shall be completely protected by sidewalk sheds or canopies, or both, providing protection from the face of the building for a minimum of 8 feet. All such canopies shall be at least 2 feet wider than the building entrances or openings (1 foot wider on each side thereof) and shall be capable of sustaining a load of 150 pounds per square foot.

Stairs, Passageways and Ladders:

Only those stairways, passageways and ladders, designated as means of access to the structure of a building, shall be used. Other access ways shall be entirely closed at all times.

All stairs, passageways, ladders and incidental equipment thereto, which are covered by this section, shall be periodically inspected and maintained in a clean, safe condition.

In a multistory building, when a stairwell is being used, it shall be properly illuminated by either natural or artificial means, and completely and substantially covered over at a point not less than two floors below the floor on which work is being performed, and access to the floor where the work is in progress shall be through a properly lighted, protected and separate passageway

Chutes:

No material shall be dropped to any point lying outside the exterior walls of the structure.

All materials chutes or sections thereof, at an angle of more than 45 degrees from the horizontal, shall be entirely enclosed except for the openings equipped with closures at or about floor level for the insertion of materials. The openings shall not exceed 48 inches in height measured along the wall of the chute. At all stories below the top floor, such openings shall be kept closed when not in use.

A substantial gate shall be installed in each chute at or near the discharge end. A competent employee shall be assigned to control the operation of the gate, and the backing and loading of trucks.

When operations are not in progress, the area surrounding the discharge end of a chute shall be securely closed off.

Any chute opening into which employees dump debris shall be protected by a substantial guardrail that is approximately 42 inches above the floor or other surface on which they stand to dump the material. Any space between the chute and the edge of openings in the floors through which it passes shall be solidly covered over.

Where the material is dumped from mechanical equipment or wheelbarrows, a securely attached toe board or bumper, not less than four inches (4") thick and six inches (6") high, shall be provided at each chute opening.

Chutes shall be designed and constructed of such strength as to eliminate failure due to impact of materials or debris loaded therein.

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Every chute used to convey material from a building shall be rigidly supported at its top and braced midway in its height.

All chutes constructed of combustible material shall be covered on the exterior with corrugate steel sheeting having a minimum thickness of 24 gauge through the entire height. Alternatively, chutes shall be constructed of non-combustible material.

All structural supports of material chutes shall be of noncombustible material.

Removal of Debris through Floor Openings:

Any openings cut in a floor for the disposal of materials shall be no larger in size than 25 percent of the aggregate of the total floor area. Floors weakened or otherwise made unsafe by demolition operations shall be shored or braced to carry safely the intended imposed load from demolition operations.

Removal of Walls, Masonry Section and Chimneys:

Masonry walls, or other sections of masonry, shall not be permitted to fall upon the floors of the building in such masses as to exceed the safe carrying capacities of the floors.

No wall section, which is more than one story in height shall be permitted to stand alone without lateral bracing, unless such wall was originally designed and constructed to stand without such lateral support and is in a condition safe enough to be self-supporting. All walls shall be left in a stable condition at the end of each shift.

Employees shall not be permitted to work on the top of a wall when weather conditions constitute a hazard.

Structural or load supporting members on any floor shall not be cut or removed until all stories above such a floor have been demolished and removed. This provision shall not prohibit the cutting of floor beams for the disposal of materials or for the installation of equipment provided the terms addressed under manual removal of floors [Manual removal of floors. - 1926.855] is followed.

Floor openings within 10 feet of any wall being demolished shall be planked solid, except when employees are kept out of the area below.

In building of "skeleton-steel" construction, the steel framing may be left in place during the demolition of masonry. Where this is done, all steel beams, girders, and similar structural supports shall be cleared of all loose material as the masonry demolition progresses downward.

Walkways or ladders shall be provided to enable employees to safely reach or leave any scaffold or wall.

Walls, which serve, as retaining walls to support earth or adjoining structures, shall not be demolished until such earth has been properly braced or adjoining structures have been properly underpinned.

Manual Removal of Floors:

Openings cut in a floor shall extend the full span of the arch between supports.

Before demolishing any floor arch, debris and other material shall be removed from such arch and other adjacent floor

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area. Planks not less than two inches (2") by ten inches (10") in cross section, full size undressed, shall be provided for, and shall be used by employees to stand on while breaking down floor arches between beams. Such planks shall be so located as to provide a safe support for employees should the arch between the beams collapse. The open space between planks shall not exceed sixteen inches (16").

Safe walkways, not less than eighteen inches (18") wide, formed of planks not less than two inches (2") thick if wood or of equivalent strength if metal, shall be provided and used by employees when necessary to enable them to reach any point without walking upon exposed beams.

Stringer of ample strength shall be installed to support the flooring planks, and the ends of such stringers shall be supported by floor beams or girders, and not by floor arches alone.

Planks shall be laid together over solid bearings with the ends overlapping at least one foot (1').

When floor arches are being removed, employees shall not be allowed in the area directly underneath, and such an area shall be barricaded to prevent access to it.

Demolition of floor arches shall not be started until they, and the surrounding floor area for a distance of twenty feet (20'), have been cleared of debris and any other unnecessary materials.

Removal of Walls, Floor and Material with Equipment:

Mechanical equipment shall not be used on floors or working surfaces unless such floors or surfaces are of sufficient strength to support the imposed load.

Floor openings shall have curbs or stop logs to prevent equipment from running over the edge.

Storage:

The storage of waste material and debris on any floor shall not exceed the allowable floor loads.

In buildings having wooden floor construction, the flooring boards may be removed from not more than one floor above grade to provide storage space for debris, provided falling material is not permitted to endanger the stability of the structure.

When wood floor beams serve to brace interior walls or free-standing exterior walls, such beams shall be left in place until other equivalent support can be installed to replace them.

Floor arches, with an elevation of not more than twenty-five feet (25') above grade, may be removed to provide storage area for debris; *provided, that such removal does not endanger the stability of the structure.*

Storage space into which material is dumped shall be locked off, except for openings necessary for the removal of material. Such openings shall be kept closed at all times when material is not being removed.

Storage spaces shall not interfere with access to any stairway or passageway.

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Purpose

The purpose of this program is to ensure that the Company continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection and development of our subcontractors.

Scope

This program applies to all subcontractors and all Company work locations.

General Requirements

All The Company subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by The Company. Approval requirements include:

- A formal safety review of the subcontractor being performed by the Company EHS department.
- The scope of the review was commensurate with the hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations and requirements of The Company.
- The subcontractor agrees to abide by our Drug and Alcohol policy and onsite safety rules throughout the duration of the work.

Any subcontractor that has a "non-approved" safety status will not be used on any The Company site.

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Procedure

PRE-QUALIFICATION OF SUBCONTRACTORS

Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics.

EVALUATION SAFETY METRICS

Acceptable safety metrics will be used as criteria for prequalifying and selecting subcontractors. The safety metrics and scoring will consider:

- The Company Subcontractor Safety Pre-Qualification Form responses and subcontractor safety program documents review 60% (Rated from 0-60 total points)
- Subcontractor safety training documents review 20% (Rated from 0-20 total points)
- Subcontractor safety statistics review 20% (Rated from 0-20 total points)

EVALUATION RATING AND ACCEPTANCE

The subcontractor rating system will have five designations:

- Equal to or Greater than 90 points = A – no restrictions.
- Between 85 and 89 points = B – Mitigation plan must be documented and approved by The Company Safety Department.
- Between 81 and 84 points = C – Mitigation plan must be documented and approved by The Company Safety Department; management approval in writing.
- Between 71 and 80 points = D – Mandatory commitment meeting with senior subcontractor management present; mitigation plan documented and approved by The Company Safety Department; management approval in writing; trained subcontractor safety personnel on site during work regardless of number of workers.

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- Less than 70 points = F – not to be used.

Once each subcontractor has been evaluated and scored, The Company EHS Department will provide management the scores/ranking.

The Company reserves the right to change a subcontractor's status to "Non-Approved" if the subcontractor shows insufficient progress towards accepted mitigation plan or other agreed upon criteria.

SUBCONTRACTOR INVOLVEMENT

Contractors are required to follow or implement the work practices and systems described below while performing work at the Company worksites:

- Attend a safety orientation, pre-job meeting or kick-off meeting provided by the Company prior to any work beginning.
- Monitor employees for substance abuse and report nonconformities to the Company.
- Ensure personnel have the required training and competency for their work.
- Participate in the Company toolbox talk safety meetings, job safety analysis or hazard assessments and on the job safety inspections.
- Perform a pre-job safety inspection that includes equipment.
- Participate in the BBS hazard reporting system.
- Report all injuries, spills, property damage incidents and near misses.
- Comply with onsite and Owner Client safety rules.
- Implement the Company safety practices and processes as applicable.
- Clean up and restore the worksite after the job is over.
- Ensure compliance with regulations at all times.
- Post job performance reviews shall be conducted for all subcontractors.

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Purpose

The purpose of the program is to prescribe rules and establish minimum requirements for traffic control.

Scope

When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

MANAGERS AND SUPERVISORS

- Managers and supervisors are responsible for ensuring that all employees, and/or contractors have been trained in the procedures, equipment and PPE associated with traffic control.

EMPLOYEES

- Employees are responsible for following this program.

Procedure

The Company shall develop, in writing, and implement a traffic control plan for its workers at a worksite if any of them may be exposed to a hazard from vehicular traffic that may endanger the safety of any worker or the public. It shall include the following control measures:

- Pedestrians have the right-of-way. Unless prohibited by traffic control devices such as signals, cones,

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barricades, delineator posts, or traffic officer, pedestrian traffic will have the right-of-way.

- The Company shall ensure the use of signs, barricades, and other control measures to protect workers from traffic hazards. Employees struck by vehicles or mobile equipment account for many work zone injuries or fatalities. Work zones should be marked by traffic control devices such as:
 - Signals
 - Message boards
 - Cones
 - Barricades
 - Delineator Posts
 - Flashing Lights
 - Flares
 - Conspicuously identified pilot vehicles
 - Speed Restrictions
- Employees exposed to traffic must wear high-visibility work vests. Workers exposed to traffic must be attired in bright, highly visible apparel. Flaggers must wear high visibility clothing with a fluorescent background and made of retroreflective material. This makes employees visible for at least 1,000 feet in any direction. See OSHA Safety Vest Classification Table.
- Provisions of Flaggers to Direct Traffic – When work activity occurs on or adjacent to a surface being used by the public, the Company is responsible for providing flagger(s) to direct traffic.
- Flaggers are provided with proper hand-signaling devices. Hand-signaling devices such as Stop/Slow paddles or red flags should be provided to flaggers. Oftentimes, the Stop/Slow paddle is the preferred hand-signaling device because the paddle gives road users more positive guidance than red flags, which are primarily used in emergency situations.
- Traffic control persons operating during hours of darkness or when there is poor visibility are provided with a reflective paddle and a flashlight fitted with a red signaling device.
- A means of communication is provided when there is more than one traffic control person. When there are multiple traffic control persons that are not working within sight of each other, an effective means of communication should be provided and used (preferably radios).

Training

- All workers involved in traffic control, including flaggers, are provided training per their respective duties. Training shall be provided to workers involved in the planning, setup, operation, maintenance or removal of traffic control to the level of their responsibility.
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OSHA Safety Vest Classifications

ANSI Class 2 Safety Vests: These safety vests are required for workers near traffic between 25-50 mph, heavy machinery, inclement weather, and low visibility conditions. ANSI class 2 vests are the most commonly required safety vests. You can also find ANSI class 2 jackets and t-shirts.

ANSI Class 3 Safety Vests: Class 3 vests are required for workers near traffic exceeding 50 mph and very dark or “no visibility” conditions. These traffic safety vests have longer sleeves than class 2 vests, to meet the requirements for high visibility and reflective material. In addition to vests, ANSI class 3 apparel can include safety jackets and long-sleeve shirts. Wearing an ANSI class 2 safety vest with ANSI class E safety pants together qualifies as an ANSI class 3 outfit.

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PURPOSE

To define requirements and responsibilities for the protection of personnel from hazards due to trenching.

Responsibility

Management is responsible for overall implementation of the trenching and excavating program. They will ensure that training is conducted, and that the necessary equipment is available to safely perform trenching and excavating operations.

Excavations must be performed under the direction of a competent person. Groome Industrial Service Group will have available a competent person who has been trained in excavations. The competent person is able to identify and predict hazards including those related to soil characteristics and will also identify the necessary protective systems.

Utilities Location

Prior to beginning any trenching or excavation, the Supervisor shall ensure that utilities have been located by calling 811 and requesting that the host facility locate any fiber optic or communication lines that may be buried in the work area.

Inspecting Trenches

The competent person must perform the following inspections on trenches more than four feet deep at the following times:

- Prior to the start of the project
- Prior to the start of work each day
- As determined throughout a shift
- After every rainstorm
- After a hazard-increasing occurrence

The competent person will document each trench inspection.

Recognize Trenching and Excavation Hazards

A competent person inspects a trench prior to the start of work to determine if there are any hazards related to the trench, the surrounding area or the protective systems.

Trench work typically involves hazards that include:

- Cave-ins
- Poisonous gases
- Falls
- Fires and explosions
- Water accumulation

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A hazardous atmosphere is one that is immediately dangerous to life or health (IDLH). In trenches, this usually occurs if the oxygen level is less than 19.5% or if the LEL is greater than 10%.

OSHA allows workers to enter a trench as long as there is not an IDLH atmosphere. However, employees must not enter a trench if:

- There is more than 10% LEL
- Oxygen content is outside the range of 19.5%-23.5%
- There is a hazardous airborne contaminant present at levels above its OSHA permissible exposure limit

If an IDLH atmosphere exists, notify your supervisor.

Trench Requirements Vary by Depth

OSHA establishes trench safeguard requirements based on the depth of the trench. There are different requirements for trenches:

- Less than four feet deep
- Between four and five feet deep
- Greater than five feet deep

Requirements for Trenches Less Than Four Feet Deep

There are no special requirements for trenches less than four feet deep. However, you should still take precautions to protect yourself.

Avoid entering a trench unless you must. Trenches are generally more hazardous than the ground, so work from the ground level if possible.

Remember all trenches regardless of their depth, can expose you to lack of oxygen or fire and explosion hazards, especially if you come in contact with a gas leak. Trenches less than four feet deep have a potential to collapse and may injure you if you are kneeling in them when they collapse.

If there is a gas line in the area, reduce the possibility of being exposed to gas due to a leak. Attempt to have the gas line turned off before starting trench activities. Always keep your head and face away from the gas line when working in a shallow trench. If possible, work upwind of the gas line.

Requirements for Trenches Greater Than Four Feet but Less Than Five Feet

When a trench is greater than four feet but less than five feet deep, you must follow certain precautions:

- Ladders must be no more than twenty-five feet from each employee to permit a fast exit from the trench

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- A competent person must evaluate the trench
- You must place dirt and materials at least two feet from the edge of the trench
- If there is the possibility of air contaminants or an oxygen deficiency in the trench, the air must be tested.

Requirements for Trenches Greater Than Five Feet

Trenches greater than five feet deep have the following requirements:

- A sloping, benching, or shoring system must protect workers entering the trench from cave-ins

Use Protective Systems

You must protect all trenches five feet deep or more from cave-ins by a sloping, benching or shoring system. Groome Industrial Service Group usually uses a sloping system. When not using a sloping system, use a portable trench box. Follow these procedures when working in trenches:

- Never work in a trench with a hazardous atmosphere or if a hazardous atmosphere is suspected
- Observe the trench safeguard requirements based on the depth of the trench
- When required, slope or shore the trench according to the proper safeguards
- Keep materials and equipment at least two feet away from the top edge of the excavation

Slope Soil Properly

You must consider the soil characteristics to safely slope a trench. Generally, the more compact the soil, the steeper you can safely slope the sides. In order to determine a safe slope, the Competent Person must understand the soil classifications. Classification depends on the soil's ability to resist caving in when excavated. There are four soil classifications:

- Solid rock: natural solid mineral material that can be excavated with vertical sides and remain intact while exposed
- Type A: cohesive soils with very high compressive strength. Examples include clay, silty clay, or sandy clay
- Type B: cohesive soils with medium compressive strength. Examples include silt, silty loam, or sandy loam
- Type C: cohesive soils with low compressive strength. Examples include gravel and sand

The different soil classifications have different slope ratios that you must observe. The ratios are listed in the following table:

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Soil Type	Allowable	Slope Ratio
Stable Rock	Vertical	(90°)
Type A	3/4:1	(53°)
Type B	1:1	(45°)
Type C	1.5:1	(34°)

For example, if you need to dig a ten-foot-deep trench, in type B soil, the maximum slope ratio permitted is 1:1. You need to slope the trench one foot horizontally for each foot in elevation. The elevation is ten feet, so you must slope the trench ten feet horizontally. OSHA permits you to assume a soil characteristic of type C in determining the safe slope angle. Therefore, if you need a ten-foot-deep trench using the type C soil ratio, the slope ratio you use is 1.5:1. You need to slope the trench one and one-half foot horizontally for each foot in elevation. The elevation is ten feet, so you must slope the trench fifteen feet horizontally.

Use Shoring

Deep trenches are usually protected by shoring (physical restraining) rather than sloping. The reason is that sloping is not always practical. In the above example a ten-foot-deep trench in type C soil requires a fifteen-foot horizontal slope. If the trench is four feet wide the excavation is thirty-four feet wide (fifteen feet on each side plus the trench's four feet). There may not be enough room to slope the trench sides.

An alternative to shoring is shielding using a portable trench box. If you cannot use the portable trench box or sloping, you must have the support system built by a qualified contractor in accordance with the requirements of OSHA Regulations 29 CFR 1926.652 (c)(1).

Train Employees

is responsible for ensuring that all excavation competent persons receive training. Training includes:

- The ability to identify and predict hazards related to trenches
- The ability to identify and predict hazards related to areas adjacent to the trench
- Protective systems
- The requirements of the OSHA Excavation Standard, 29 CFR 1926 Subpart P

Employees who work in trenches will also receive training on trench hazard recognition and control.

DEFINITIONS

Cohesive soil: Clay or soil with a high clay content that has cohesive strength. Cohesive soil does not crumble, can be excavated with vertical side slopes and is plastic when moist. Cohesive soil is hard to break up when dry and exhibits significant cohesion when submerged. Cohesive soils include clay silt, sandy clay, silty clay, clay and organic clay.

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Competent person: One who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous or dangerous to employees and who has authorization to take prompt corrective measures. Competent Persons must be knowledgeable in the OSHA trenching and excavating standards.

Excavation: Any man-made cut, cavity, trench or depression in an earth surface, formed by earth removal.

Hazardous atmosphere: An atmosphere which by reason of being explosive, flammable, poisonous, corrosive, oxidizing, irritating, oxygen deficient, toxic or otherwise harmful may cause death, illness or injury.

Shield system: A structure that is able to withstand the forces imposed on it by a cave-in and thereby protect employees within the structure. Shields can be permanent structures or can be designed to be portable and moved along as work progresses. Additionally, shields can be either premanufactured or built on-the-job and approved by a qualified engineer. Shields used in trenches are usually referred to as trench boxes or trench shields.

Shoring: A structure such as a hydraulic, mechanical or timber shoring system that supports the sides of an excavation and that is designed to prevent cave-ins.

Soil classification system: A method of categorizing soil and rock deposits in a hierarchy of Stable Rock, Type A, Type B, and Type C in decreasing order of stability.

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Purpose

This program is intended to establish site specific procedures for checking the well-being of a worker assigned to work alone.

Scope

This procedure applies to Company operations where employees may be exposed to working alone.

When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

This applies if a worker is working alone at a work site and assistance is not readily available if there is an emergency or the worker is injured or ill. Working alone is considered a hazard.

Objectives

Groome has developed a written Working Alone program describing monitoring procedures. This applies if a worker is working alone at a work site, and assistance is not readily available if there is an emergency, or the worker is injured or ill.

To minimize risk to employees who may work alone, and assistance is not readily available Company will:

- Take measures to eliminate or control the hazards of working alone at Company worksites.
- Ensure that affected employees are informed of the hazards and methods used to control or eliminate them.
- Provide an effective system for communication between any employee who work alone and persons capable of assisting the employee.
- Ensure all incidents (working related or otherwise) are reported, investigated and documented.
- Review the Working Alone Program at least annually or more frequently if there is a change in work arrangements which could adversely affect an employee's well-being or a report that the

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system is not working effectively.

Key Responsibilities

EHS MANAGER

- Conducts a hazard assessment to identify existing or potential hazards related to the nature of the work or the work environment given the circumstances of the work when working alone
- Responsible for the review, implementation and maintenance of the local worksite Working Alone Program.
- Communicate this policy and its procedures to employees who work alone
- Annually review the effectiveness of the hazard controls and procedures and make improvements as required

WORKSITE PROJECT MANAGER

- Responsible for the implementation and maintenance of the Working Alone Program for their facility and ensuring all assets are made available for compliance with the procedure.
- Take all reasonable and practical steps to minimize or eliminate identified working alone risks.

JOINT HEALTH AND SAFETY COMMITTEE (IF UTILIZED)

- Review the hazard assessment results and provide recommendations to management to minimize or eliminate identified working alone risks.
- Review annually the effectiveness of the policy and guidelines and make changes as required by consulting with management staff and employee representatives.
- Respond to employee concerns related to working alone and communicate these to management employees
- Report all incidents of work site incidents immediately to their supervisor as required by local regulatory requirements.
- Participate in work site hazard assessments and the implementing of procedures to eliminate or control hazards of working alone.
- Take every reasonable precaution when working alone.
- Shall follow the requirements of the Working Alone Program

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Safe Work Procedures

RISK ASSESSMENT AND CONTROLS

A risk assessment must be conducted to evaluate the risk of working alone and identify appropriate control measures. Where a worker is required to work alone or at an isolated place of employment, Company, in consultation with the workers, shall identify the risks arising from the conditions and circumstances of the worker's work or the isolation of the place of employment. It shall involve:

- A review of records, past incidents and identify measures or actions needed to correct any hazards.
- Participation by the committee at the workplace, the representative at the workplace, or when there is no committee or representative, the workers at the workplace.
- Participation by employees through methods such as one-on-one interviews, focus groups, employee surveys and work site inspections.
- The assessment will also collect and document information from employees about their experiences working alone, their current concerns, and their suggestions for improvement.
- Consideration for the time interval between checks and the procedure to follow in case the employee cannot be contacted, including provisions for emergency rescue.

Working Alone Program

BASIC REQUIREMENTS

The Company must, for any worker working alone, provide an effective communication system consisting of:

- radio communication,
- landline or cellular telephone communication, or
- some other effective means of electronic communication that includes regular contact by COMPANY or designate at intervals appropriate to the nature of the hazard associated with the worker's work.

If effective electronic communication is not practicable at the work site, COMPANY must ensure that COMPANY or designate visits the worker or the worker contacts COMPANY or designate at intervals appropriate to the nature of the hazard associated with the worker's work.

The Company must develop and implement a written procedure for checking the well-being of a worker assigned to work

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alone or in isolation under conditions which present a risk of disabling injury, if the worker might not be able to secure assistance in the event of injury or other misfortune.

The Company will post a copy of the safe work procedures in a conspicuous place at the workplace.

The procedure for checking a worker's well-being must include the time interval between checks and the procedure to follow in case the worker cannot be contacted, including provisions for emergency rescue. In addition to checks at regular intervals, a check at the end of the work shift must be done. The procedure for checking a worker's well-being, including time intervals between the checks, must be developed in consultation with the joint committee or the worker health and safety representative, as applicable and with the worker assigned to work alone or in isolation.

COMMUNICATION AND REGULAR CONTACT PERSON SYSTEM

Workers must carry a cellular phone or electronic monitoring device at all times while working alone. The Company must, for any worker working alone, provide an effective communication system consisting of radio communication landline or cellular telephone communication or some other effective means of electronic communication that includes regular contact by the Company or designate at intervals appropriate to the nature of the hazard associated with the worker's work.

Each worksite's Working Alone Program shall address having an established contact person. A person must be designated to establish contact with the employee at predetermined intervals and the results must be recorded by the person.

PROCEDURES TO BE FOLLOWED IF ELECTRONIC COMMUNICATION IS NOT PRACTICABLE

If effective electronic communication is not practicable at the work site, the Company must ensure that the Company or designate visits the worker or the worker contacts Company or designate at intervals appropriate to the nature of the hazard associated with the worker's work. Example requirements include:

- The Company must ensure that a representative of the Company or another competent employee visits the employee, or the employee contacts the Company or another competent employee. These visits or contacts shall be at intervals of time appropriate to the nature of the hazards associated with the employee's work. As a minimum, contact shall occur no less than every four hours. In addition to checks at regular intervals, a check at the end of the work shift must also be done.
- Limitations on or Prohibitions of Specified Activities
 - o No heavy equipment will be operated if a worker is alone.
 - o No hot work will occur if a worker is alone.
 - o No working at heights will occur if a work is alone and requiring a personal fall arrest system.

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- o No working alone outside if temperatures are low enough to pose an imminent risk to the worker.
- o Other limitations will be placed based on the site-specific hazard assessment

MINIMUM TRAINING OR EXPERIENCE

All employees will be trained (if working alone is a hazard at that location) in:

- Any revision to the written local Working Alone Program and safe work practices.
- Being informed of working alone hazards at the Company worksite and the methods used to control or eliminate them.
- The methods for identification, hazard reduction and prevention when working alone and dealing with situations or individuals that presents a potential risk.
- A worker required working alone and any person assigned to check on the worker must be trained in the written procedure for checking the worker's well-being.
- All training shall be documented.

PROVISIONS OF PPE

- Cold weather clothing shall be worn when appropriate if a worker is alone.
- Additional PPE for workers working alone will be identified in the site-specific hazard and PPE assessment process

SAFE WORK PRACTICES

Controls implemented at the Company worksites shall, as a minimum:

- Restricted building access to buildings - card keys or regular keys after regular working hours.
- Office doors are to be locked when working alone after hours.
- Have employees check road reports and weather forecast before traveling and NOT allow travel if road conditions are dangerous.
- Develop a travel plan that includes rest breaks, a procedure for tracking overdue employees and emergency contact information.
- Ensure all Company vehicles are to be equipped with cell phones or radios and first aid kits.
- Advise employees to travel with another employee when possible.
- Advise employees to park close to the building in the evening.
- Post signage, emergency contact information, and develop a communication system.
- Report suspicious activity to security or a supervisor.

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PROVISION OF EMERGENCY SUPPLIES

- All vehicles shall contain the appropriate emergency supplies including flares, marking devices, food, water, warm clothing during winter and other supplies as determined by the hazard assessment.
- Workers working alone shall have spare batteries for communication devices in case of power failure, a radio for local weather conditions and other equipment as determined by the hazard assessment.

REVIEW & UPDATING WORKING ALONE PROGRAM

- The hazard assessment and Working Alone Program at each Company worksite must be reviewed at least on an annual basis or more frequently if there is a change in work processes or arrangements which could adversely affect an employee's well-being are introduced or changed.
- The local Working Alone Program shall also be revised if there is any indication or report that the program is not working effectively or needs changing.

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WORKING ALONE ASSESSMENT & GUIDELINES FOR COMPANY WORKSITES

Location:			
Evaluated by:			
Original Date:		Signature:	
Revision Date:		Date:	

Hazardous Activities

Hazard:	Actions to minimize Risk:
<i>Indicate working alone hazards</i>	<i>Indicate actions taken to minimize risks</i>

Emergency Phone Numbers

Number	Contact:	For:
<i>Indicate #</i>	<i>Indicate source information; i.e., security</i>	ANY emergency: medical, fire, etc.
		Suspicious Person
		General Inquiries
		Need for employee escort
		Maintenance Emergencies
		Information

Location of Resources

<i>Indicate location</i>	<i>(examples shown)</i>
	fire extinguisher
	first aid kit
	telephone
	telephone backup (radios or emergency buttons for worksite security)

Restricted activities when working Alone

Indicate restricted activities (no driving, locked doors, etc.)

A copy of this form shall be supplied to the Company EHS Manager and the Guidelines be reviewed no less than annually.

Request for Taxpayer Identification Number and Certification

Go to www.irs.gov/FormW9 for instructions and the latest information.

Give form to the
requester. Do not
send to the IRS.

Before you begin. For guidance related to the purpose of Form W-9, see *Purpose of Form*, below.

Print or type. See Specific Instructions on page 3.	1 Name of entity/individual. An entry is required. (For a sole proprietor or disregarded entity, enter the owner's name on line 1, and enter the business/disregarded entity's name on line 2.) Groome Industrial Service Group, LLC	
	2 Business name/disregarded entity name, if different from above.	
	3a Check the appropriate box for federal tax classification of the entity/individual whose name is entered on line 1. Check only one of the following seven boxes. ☐ Individual/sole proprietor ☐ C corporation ☐ S corporation ☐ Partnership ☐ Trust/estate ☒ LLC. Enter the tax classification (C = C corporation, S = S corporation, P = Partnership) P Note: Check the "LLC" box above and, in the entry space, enter the appropriate code (C, S, or P) for the tax classification of the LLC, unless it is a disregarded entity. A disregarded entity should instead check the appropriate box for the tax classification of its owner. ☐ Other (see instructions) _____	4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3): Exempt payee code (if any) _____ Exemption from Foreign Account Tax Compliance Act (FATCA) reporting code (if any) _____ (Applies to accounts maintained outside the United States.)
	3b If on line 3a you checked "Partnership" or "Trust/estate," or checked "LLC" and entered "P" as its tax classification, and you are providing this form to a partnership, trust, or estate in which you have an ownership interest, check this box if you have any foreign partners, owners, or beneficiaries. See instructions ☐	
	5 Address (number, street, and apt. or suite no.). See instructions. 305 Palmer Rd	Requester's name and address (optional)
6 City, state, and ZIP code Denville NJ 07834		
7 List account number(s) here (optional)		

Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

Note: If the account is in more than one name, see the instructions for line 1. See also *What Name and Number To Give the Requester* for guidelines on whose number to enter.

Social security number									
			-			-			
or									
Employer identification number									
8	4	-	3	0	3	0	3	2	1

Part II Certification

Under penalties of perjury, I certify that:

- The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
- I am not subject to backup withholding because (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
- I am a U.S. citizen or other U.S. person (defined below); and
- The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and, generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

Sign Here Signature of U.S. person *Chauhanee Holbrook*

Date **2/21/2025**

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Future developments. For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/FormW9.

What's New

Line 3a has been modified to clarify how a disregarded entity completes this line. An LLC that is a disregarded entity should check the appropriate box for the tax classification of its owner. Otherwise, it should check the "LLC" box and enter its appropriate tax classification.

New line 3b has been added to this form. A flow-through entity is required to complete this line to indicate that it has direct or indirect foreign partners, owners, or beneficiaries when it provides the Form W-9 to another flow-through entity in which it has an ownership interest. This change is intended to provide a flow-through entity with information regarding the status of its indirect foreign partners, owners, or beneficiaries, so that it can satisfy any applicable reporting requirements. For example, a partnership that has any indirect foreign partners may be required to complete Schedules K-2 and K-3. See the Partnership Instructions for Schedules K-2 and K-3 (Form 1065).

Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS is giving you this form because they

must obtain your correct taxpayer identification number (TIN), which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following.

- Form 1099-INT (interest earned or paid).
- Form 1099-DIV (dividends, including those from stocks or mutual funds).
- Form 1099-MISC (various types of income, prizes, awards, or gross proceeds).
- Form 1099-NEC (nonemployee compensation).
- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers).
- Form 1099-S (proceeds from real estate transactions).
- Form 1099-K (merchant card and third-party network transactions).
- Form 1098 (home mortgage interest), 1098-E (student loan interest), and 1098-T (tuition).
- Form 1099-C (canceled debt).
- Form 1099-A (acquisition or abandonment of secured property).

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

Caution: If you don't return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See *What is backup withholding*, later.

By signing the filled-out form, you:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued);
2. Certify that you are not subject to backup withholding; or
3. Claim exemption from backup withholding if you are a U.S. exempt payee; and
4. Certify to your non-foreign status for purposes of withholding under chapter 3 or 4 of the Code (if applicable); and
5. Certify that FATCA code(s) entered on this form (if any) indicating that you are exempt from the FATCA reporting is correct. See *What Is FATCA Reporting*, later, for further information.

Note: If you are a U.S. person and a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien;
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States;
- An estate (other than a foreign estate); or
- A domestic trust (as defined in Regulations section 301.7701-7).

Establishing U.S. status for purposes of chapter 3 and chapter 4 withholding. Payments made to foreign persons, including certain distributions, allocations of income, or transfers of sales proceeds, may be subject to withholding under chapter 3 or chapter 4 of the Code (sections 1441-1474). Under those rules, if a Form W-9 or other certification of non-foreign status has not been received, a withholding agent, transferee, or partnership (payor) generally applies presumption rules that may require the payor to withhold applicable tax from the recipient, owner, transferor, or partner (payee). See Pub. 515, *Withholding of Tax on Nonresident Aliens and Foreign Entities*.

The following persons must provide Form W-9 to the payor for purposes of establishing its non-foreign status.

- In the case of a disregarded entity with a U.S. owner, the U.S. owner of the disregarded entity and not the disregarded entity.
- In the case of a grantor trust with a U.S. grantor or other U.S. owner, generally, the U.S. grantor or other U.S. owner of the grantor trust and not the grantor trust.
- In the case of a U.S. trust (other than a grantor trust), the U.S. trust and not the beneficiaries of the trust.

See Pub. 515 for more information on providing a Form W-9 or a certification of non-foreign status to avoid withholding.

Foreign person. If you are a foreign person or the U.S. branch of a foreign bank that has elected to be treated as a U.S. person (under Regulations section 1.1441-1(b)(2)(iv) or other applicable section for chapter 3 or 4 purposes), do not use Form W-9. Instead, use the appropriate Form W-8 or Form 8233 (see Pub. 515). If you are a qualified foreign pension fund under Regulations section 1.897(l)-1(d), or a partnership that is wholly owned by qualified foreign pension funds, that is treated as a non-foreign person for purposes of section 1445 withholding, do not use Form W-9. Instead, use Form W-8EXP (or other certification of non-foreign status).

Nonresident alien who becomes a resident alien. Generally, only a nonresident alien individual may use the terms of a tax treaty to reduce or eliminate U.S. tax on certain types of income. However, most tax treaties contain a provision known as a saving clause. Exceptions specified in the saving clause may permit an exemption from tax to continue for certain types of income even after the payee has otherwise become a U.S. resident alien for tax purposes.

If you are a U.S. resident alien who is relying on an exception contained in the saving clause of a tax treaty to claim an exemption from U.S. tax on certain types of income, you must attach a statement to Form W-9 that specifies the following five items.

1. The treaty country. Generally, this must be the same treaty under which you claimed exemption from tax as a nonresident alien.
2. The treaty article addressing the income.
3. The article number (or location) in the tax treaty that contains the saving clause and its exceptions.
4. The type and amount of income that qualifies for the exemption from tax.
5. Sufficient facts to justify the exemption from tax under the terms of the treaty article.

Example. Article 20 of the U.S.-China income tax treaty allows an exemption from tax for scholarship income received by a Chinese student temporarily present in the United States. Under U.S. law, this student will become a resident alien for tax purposes if their stay in the United States exceeds 5 calendar years. However, paragraph 2 of the first Protocol to the U.S.-China treaty (dated April 30, 1984) allows the provisions of Article 20 to continue to apply even after the Chinese student becomes a resident alien of the United States. A Chinese student who qualifies for this exception (under paragraph 2 of the first Protocol) and is relying on this exception to claim an exemption from tax on their scholarship or fellowship income would attach to Form W-9 a statement that includes the information described above to support that exemption.

If you are a nonresident alien or a foreign entity, give the requester the appropriate completed Form W-8 or Form 8233.

Backup Withholding

What is backup withholding? Persons making certain payments to you must under certain conditions withhold and pay to the IRS 24% of such payments. This is called "backup withholding." Payments that may be subject to backup withholding include, but are not limited to, interest, tax-exempt interest, dividends, broker and barter exchange transactions, rents, royalties, nonemployee pay, payments made in settlement of payment card and third-party network transactions, and certain payments from fishing boat operators. Real estate transactions are not subject to backup withholding.

You will not be subject to backup withholding on payments you receive if you give the requester your correct TIN, make the proper certifications, and report all your taxable interest and dividends on your tax return.

Payments you receive will be subject to backup withholding if:

1. You do not furnish your TIN to the requester;
2. You do not certify your TIN when required (see the instructions for Part II for details);
3. The IRS tells the requester that you furnished an incorrect TIN;
4. The IRS tells you that you are subject to backup withholding because you did not report all your interest and dividends on your tax return (for reportable interest and dividends only); or
5. You do not certify to the requester that you are not subject to backup withholding, as described in item 4 under "*By signing the filled-out form*" above (for reportable interest and dividend accounts opened after 1983 only).

Certain payees and payments are exempt from backup withholding. See *Exempt payee code*, later, and the separate Instructions for the Requester of Form W-9 for more information.

See also *Establishing U.S. status for purposes of chapter 3 and chapter 4 withholding*, earlier.

What Is FATCA Reporting?

The Foreign Account Tax Compliance Act (FATCA) requires a participating foreign financial institution to report all U.S. account holders that are specified U.S. persons. Certain payees are exempt from FATCA reporting. See *Exemption from FATCA reporting code*, later, and the Instructions for the Requester of Form W-9 for more information.

Updating Your Information

You must provide updated information to any person to whom you claimed to be an exempt payee if you are no longer an exempt payee and anticipate receiving reportable payments in the future from this person. For example, you may need to provide updated information if you are a C corporation that elects to be an S corporation, or if you are no longer tax exempt. In addition, you must furnish a new Form W-9 if the name or TIN changes for the account, for example, if the grantor of a grantor trust dies.

Penalties

Failure to furnish TIN. If you fail to furnish your correct TIN to a requester, you are subject to a penalty of \$50 for each such failure unless your failure is due to reasonable cause and not to willful neglect.

Civil penalty for false information with respect to withholding. If you make a false statement with no reasonable basis that results in no backup withholding, you are subject to a \$500 penalty.

Criminal penalty for falsifying information. Willfully falsifying certifications or affirmations may subject you to criminal penalties including fines and/or imprisonment.

Misuse of TINs. If the requester discloses or uses TINs in violation of federal law, the requester may be subject to civil and criminal penalties.

Specific Instructions

Line 1

You must enter one of the following on this line; **do not** leave this line blank. The name should match the name on your tax return.

If this Form W-9 is for a joint account (other than an account maintained by a foreign financial institution (FFI)), list first, and then circle, the name of the person or entity whose number you entered in Part I of Form W-9. If you are providing Form W-9 to an FFI to document a joint account, each holder of the account that is a U.S. person must provide a Form W-9.

• **Individual.** Generally, enter the name shown on your tax return. If you have changed your last name without informing the Social Security Administration (SSA) of the name change, enter your first name, the last name as shown on your social security card, and your new last name.

Note for ITIN applicant: Enter your individual name as it was entered on your Form W-7 application, line 1a. This should also be the same as the name you entered on the Form 1040 you filed with your application.

• **Sole proprietor.** Enter your individual name as shown on your Form 1040 on line 1. Enter your business, trade, or "doing business as" (DBA) name on line 2.

• **Partnership, C corporation, S corporation, or LLC, other than a disregarded entity.** Enter the entity's name as shown on the entity's tax return on line 1 and any business, trade, or DBA name on line 2.

• **Other entities.** Enter your name as shown on required U.S. federal tax documents on line 1. This name should match the name shown on the charter or other legal document creating the entity. Enter any business, trade, or DBA name on line 2.

• **Disregarded entity.** In general, a business entity that has a single owner, including an LLC, and is not a corporation, is disregarded as an entity separate from its owner (a disregarded entity). See Regulations section 301.7701-2(c)(2). A disregarded entity should check the appropriate box for the tax classification of its owner. Enter the owner's name on line 1. The name of the owner entered on line 1 should never be a disregarded entity. The name on line 1 should be the name shown on the income tax return on which the income should be reported. For

example, if a foreign LLC that is treated as a disregarded entity for U.S. federal tax purposes has a single owner that is a U.S. person, the U.S. owner's name is required to be provided on line 1. If the direct owner of the entity is also a disregarded entity, enter the first owner that is not disregarded for federal tax purposes. Enter the disregarded entity's name on line 2. If the owner of the disregarded entity is a foreign person, the owner must complete an appropriate Form W-8 instead of a Form W-9. This is the case even if the foreign person has a U.S. TIN.

Line 2

If you have a business name, trade name, DBA name, or disregarded entity name, enter it on line 2.

Line 3a

Check the appropriate box on line 3a for the U.S. federal tax classification of the person whose name is entered on line 1. Check only one box on line 3a.

IF the entity/individual on line 1 is a(n) . . .	THEN check the box for . . .
• Corporation	Corporation.
• Individual or	Individual/sole proprietor.
• Sole proprietorship	
• LLC classified as a partnership for U.S. federal tax purposes or	Limited liability company and enter the appropriate tax classification:
• LLC that has filed Form 8832 or 2553 electing to be taxed as a corporation	P = Partnership, C = C corporation, or S = S corporation.
• Partnership	Partnership.
• Trust/estate	Trust/estate.

Line 3b

Check this box if you are a partnership (including an LLC classified as a partnership for U.S. federal tax purposes), trust, or estate that has any foreign partners, owners, or beneficiaries, and you are providing this form to a partnership, trust, or estate, in which you have an ownership interest. You must check the box on line 3b if you receive a Form W-8 (or documentary evidence) from any partner, owner, or beneficiary establishing foreign status or if you receive a Form W-9 from any partner, owner, or beneficiary that has checked the box on line 3b.

Note: A partnership that provides a Form W-9 and checks box 3b may be required to complete Schedules K-2 and K-3 (Form 1065). For more information, see the Partnership Instructions for Schedules K-2 and K-3 (Form 1065).

If you are required to complete line 3b but fail to do so, you may not receive the information necessary to file a correct information return with the IRS or furnish a correct payee statement to your partners or beneficiaries. See, for example, sections 6698, 6722, and 6724 for penalties that may apply.

Line 4 Exemptions

If you are exempt from backup withholding and/or FATCA reporting, enter in the appropriate space on line 4 any code(s) that may apply to you.

Exempt payee code.

- Generally, individuals (including sole proprietors) are not exempt from backup withholding.
- Except as provided below, corporations are exempt from backup withholding for certain payments, including interest and dividends.
- Corporations are not exempt from backup withholding for payments made in settlement of payment card or third-party network transactions.
- Corporations are not exempt from backup withholding with respect to attorneys' fees or gross proceeds paid to attorneys, and corporations that provide medical or health care services are not exempt with respect to payments reportable on Form 1099-MISC.

The following codes identify payees that are exempt from backup withholding. Enter the appropriate code in the space on line 4.

1—An organization exempt from tax under section 501(a), any IRA, or a custodial account under section 403(b)(7) if the account satisfies the requirements of section 401(f)(2).

- 2—The United States or any of its agencies or instrumentalities.
- 3—A state, the District of Columbia, a U.S. commonwealth or territory, or any of their political subdivisions or instrumentalities.
- 4—A foreign government or any of its political subdivisions, agencies, or instrumentalities.
- 5—A corporation.
- 6—A dealer in securities or commodities required to register in the United States, the District of Columbia, or a U.S. commonwealth or territory.
- 7—A futures commission merchant registered with the Commodity Futures Trading Commission.
- 8—A real estate investment trust.
- 9—An entity registered at all times during the tax year under the Investment Company Act of 1940.
- 10—A common trust fund operated by a bank under section 584(a).
- 11—A financial institution as defined under section 581.
- 12—A middleman known in the investment community as a nominee or custodian.
- 13—A trust exempt from tax under section 664 or described in section 4947.

The following chart shows types of payments that may be exempt from backup withholding. The chart applies to the exempt payees listed above, 1 through 13.

IF the payment is for . . .	THEN the payment is exempt for . . .
• Interest and dividend payments	All exempt payees except for 7.
• Broker transactions	Exempt payees 1 through 4 and 6 through 11 and all C corporations. S corporations must not enter an exempt payee code because they are exempt only for sales of noncovered securities acquired prior to 2012.
• Barter exchange transactions and patronage dividends	Exempt payees 1 through 4.
• Payments over \$600 required to be reported and direct sales over \$5,000 ¹	Generally, exempt payees 1 through 5. ²
• Payments made in settlement of payment card or third-party network transactions	Exempt payees 1 through 4.

¹ See Form 1099-MISC, Miscellaneous Information, and its instructions.

² However, the following payments made to a corporation and reportable on Form 1099-MISC are not exempt from backup withholding: medical and health care payments, attorneys' fees, gross proceeds paid to an attorney reportable under section 6045(f), and payments for services paid by a federal executive agency.

Exemption from FATCA reporting code. The following codes identify payees that are exempt from reporting under FATCA. These codes apply to persons submitting this form for accounts maintained outside of the United States by certain foreign financial institutions. Therefore, if you are only submitting this form for an account you hold in the United States, you may leave this field blank. Consult with the person requesting this form if you are uncertain if the financial institution is subject to these requirements. A requester may indicate that a code is not required by providing you with a Form W-9 with "Not Applicable" (or any similar indication) entered on the line for a FATCA exemption code.

A—An organization exempt from tax under section 501(a) or any individual retirement plan as defined in section 7701(a)(37).

B—The United States or any of its agencies or instrumentalities.

C—A state, the District of Columbia, a U.S. commonwealth or territory, or any of their political subdivisions or instrumentalities.

D—A corporation the stock of which is regularly traded on one or more established securities markets, as described in Regulations section 1.1472-1(c)(1)(i).

E—A corporation that is a member of the same expanded affiliated group as a corporation described in Regulations section 1.1472-1(c)(1)(i).

F—A dealer in securities, commodities, or derivative financial instruments (including notional principal contracts, futures, forwards, and options) that is registered as such under the laws of the United States or any state.

G—A real estate investment trust.

H—A regulated investment company as defined in section 851 or an entity registered at all times during the tax year under the Investment Company Act of 1940.

I—A common trust fund as defined in section 584(a).

J—A bank as defined in section 581.

K—A broker.

L—A trust exempt from tax under section 664 or described in section 4947(a)(1).

M—A tax-exempt trust under a section 403(b) plan or section 457(g) plan.

Note: You may wish to consult with the financial institution requesting this form to determine whether the FATCA code and/or exempt payee code should be completed.

Line 5

Enter your address (number, street, and apartment or suite number). This is where the requester of this Form W-9 will mail your information returns. If this address differs from the one the requester already has on file, enter "NEW" at the top. If a new address is provided, there is still a chance the old address will be used until the payor changes your address in their records.

Line 6

Enter your city, state, and ZIP code.

Part I. Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. If you are a resident alien and you do not have, and are not eligible to get, an SSN, your TIN is your IRS ITIN. Enter it in the entry space for the Social security number. If you do not have an ITIN, see *How to get a TIN* below.

If you are a sole proprietor and you have an EIN, you may enter either your SSN or EIN.

If you are a single-member LLC that is disregarded as an entity separate from its owner, enter the owner's SSN (or EIN, if the owner has one). If the LLC is classified as a corporation or partnership, enter the entity's EIN.

Note: See *What Name and Number To Give the Requester*, later, for further clarification of name and TIN combinations.

How to get a TIN. If you do not have a TIN, apply for one immediately. To apply for an SSN, get Form SS-5, Application for a Social Security Card, from your local SSA office or get this form online at www.SSA.gov. You may also get this form by calling 800-772-1213. Use Form W-7, Application for IRS Individual Taxpayer Identification Number, to apply for an ITIN, or Form SS-4, Application for Employer Identification Number, to apply for an EIN. You can apply for an EIN online by accessing the IRS website at www.irs.gov/EIN. Go to www.irs.gov/Forms to view, download, or print Form W-7 and/or Form SS-4. Or, you can go to www.irs.gov/OrderForms to place an order and have Form W-7 and/or Form SS-4 mailed to you within 15 business days.

If you are asked to complete Form W-9 but do not have a TIN, apply for a TIN and enter "Applied For" in the space for the TIN, sign and date the form, and give it to the requester. For interest and dividend payments, and certain payments made with respect to readily tradable instruments, you will generally have 60 days to get a TIN and give it to the requester before you are subject to backup withholding on payments. The 60-day rule does not apply to other types of payments. You will be subject to backup withholding on all such payments until you provide your TIN to the requester.

Note: Entering "Applied For" means that you have already applied for a TIN or that you intend to apply for one soon. See also *Establishing U.S. status for purposes of chapter 3 and chapter 4 withholding*, earlier, for when you may instead be subject to withholding under chapter 3 or 4 of the Code.

Caution: A disregarded U.S. entity that has a foreign owner must use the appropriate Form W-8.

Part II. Certification

To establish to the withholding agent that you are a U.S. person, or resident alien, sign Form W-9. You may be requested to sign by the withholding agent even if item 1, 4, or 5 below indicates otherwise.

For a joint account, only the person whose TIN is shown in Part I should sign (when required). In the case of a disregarded entity, the person identified on line 1 must sign. Exempt payees, see *Exempt payee code*, earlier.

Signature requirements. Complete the certification as indicated in items 1 through 5 below.

1. Interest, dividend, and barter exchange accounts opened before 1984 and broker accounts considered active during 1983.

You must give your correct TIN, but you do not have to sign the certification.

2. Interest, dividend, broker, and barter exchange accounts opened after 1983 and broker accounts considered inactive during 1983. You must sign the certification or backup withholding will apply. If you are subject to backup withholding and you are merely providing your correct TIN to the requester, you must cross out item 2 in the certification before signing the form.

3. Real estate transactions. You must sign the certification. You may cross out item 2 of the certification.

4. Other payments. You must give your correct TIN, but you do not have to sign the certification unless you have been notified that you have previously given an incorrect TIN. "Other payments" include payments made in the course of the requester's trade or business for rents, royalties, goods (other than bills for merchandise), medical and health care services (including payments to corporations), payments to a nonemployee for services, payments made in settlement of payment card and third-party network transactions, payments to certain fishing boat crew members and fishermen, and gross proceeds paid to attorneys (including payments to corporations).

5. Mortgage interest paid by you, acquisition or abandonment of secured property, cancellation of debt, qualified tuition program payments (under section 529), ABLE accounts (under section 529A), IRA, Coverdell ESA, Archer MSA or HSA contributions or distributions, and pension distributions. You must give your correct TIN, but you do not have to sign the certification.

What Name and Number To Give the Requester

For this type of account:	Give name and SSN of:
1. Individual	The individual
2. Two or more individuals (joint account) other than an account maintained by an FFI	The actual owner of the account or, if combined funds, the first individual on the account ¹
3. Two or more U.S. persons (joint account maintained by an FFI)	Each holder of the account
4. Custodial account of a minor (Uniform Gift to Minors Act)	The minor ²
5. a. The usual revocable savings trust (grantor is also trustee)	The grantor-trustee ¹
b. So-called trust account that is not a legal or valid trust under state law	The actual owner ¹
6. Sole proprietorship or disregarded entity owned by an individual	The owner ³
7. Grantor trust filing under Optional Filing Method 1 (see Regulations section 1.671-4(b)(2)(i)(A))**	The grantor*

For this type of account:	Give name and EIN of:
8. Disregarded entity not owned by an individual	The owner
9. A valid trust, estate, or pension trust	Legal entity ⁴
10. Corporation or LLC electing corporate status on Form 8832 or Form 2553	The corporation
11. Association, club, religious, charitable, educational, or other tax-exempt organization	The organization
12. Partnership or multi-member LLC	The partnership
13. A broker or registered nominee	The broker or nominee
14. Account with the Department of Agriculture in the name of a public entity (such as a state or local government, school district, or prison) that receives agricultural program payments	The public entity
15. Grantor trust filing Form 1041 or under the Optional Filing Method 2, requiring Form 1099 (see Regulations section 1.671-4(b)(2)(i)(B))**	The trust

¹ List first and circle the name of the person whose number you furnish. If only one person on a joint account has an SSN, that person's number must be furnished.

² Circle the minor's name and furnish the minor's SSN.

³ You must show your individual name on line 1, and enter your business or DBA name, if any, on line 2. You may use either your SSN or EIN (if you have one), but the IRS encourages you to use your SSN.

⁴ List first and circle the name of the trust, estate, or pension trust. (Do not furnish the TIN of the personal representative or trustee unless the legal entity itself is not designated in the account title.)

* **Note:** The grantor must also provide a Form W-9 to the trustee of the trust.

** For more information on optional filing methods for grantor trusts, see the Instructions for Form 1041.

Note: If no name is circled when more than one name is listed, the number will be considered to be that of the first name listed.

Secure Your Tax Records From Identity Theft

Identity theft occurs when someone uses your personal information, such as your name, SSN, or other identifying information, without your permission to commit fraud or other crimes. An identity thief may use your SSN to get a job or may file a tax return using your SSN to receive a refund.

To reduce your risk:

- Protect your SSN,
- Ensure your employer is protecting your SSN, and
- Be careful when choosing a tax return preparer.

If your tax records are affected by identity theft and you receive a notice from the IRS, respond right away to the name and phone number printed on the IRS notice or letter.

If your tax records are not currently affected by identity theft but you think you are at risk due to a lost or stolen purse or wallet, questionable credit card activity, or a questionable credit report, contact the IRS Identity Theft Hotline at 800-908-4490 or submit Form 14039.

For more information, see Pub. 5027, Identity Theft Information for Taxpayers.

Victims of identity theft who are experiencing economic harm or a systemic problem, or are seeking help in resolving tax problems that have not been resolved through normal channels, may be eligible for Taxpayer Advocate Service (TAS) assistance. You can reach TAS by calling the TAS toll-free case intake line at 877-777-4778 or TTY/TDD 800-829-4059.

Protect yourself from suspicious emails or phishing schemes.

Phishing is the creation and use of email and websites designed to mimic legitimate business emails and websites. The most common act is sending an email to a user falsely claiming to be an established legitimate enterprise in an attempt to scam the user into surrendering private information that will be used for identity theft.

The IRS does not initiate contacts with taxpayers via emails. Also, the IRS does not request personal detailed information through email or ask taxpayers for the PIN numbers, passwords, or similar secret access information for their credit card, bank, or other financial accounts.

If you receive an unsolicited email claiming to be from the IRS, forward this message to phishing@irs.gov. You may also report misuse of the IRS name, logo, or other IRS property to the Treasury Inspector General for Tax Administration (TIGTA) at 800-366-4484. You can forward suspicious emails to the Federal Trade Commission at spam@uce.gov or report them at www.ftc.gov/complaint. You can contact the FTC at www.ftc.gov/idtheft or 877-IDTHEFT (877-438-4338). If you have been the victim of identity theft, see www.IdentityTheft.gov and Pub. 5027.

Go to www.irs.gov/IdentityTheft to learn more about identity theft and how to reduce your risk.

Privacy Act Notice

Section 6109 of the Internal Revenue Code requires you to provide your correct TIN to persons (including federal agencies) who are required to file information returns with the IRS to report interest, dividends, or certain other income paid to you; mortgage interest you paid; the acquisition or abandonment of secured property; the cancellation of debt; or contributions you made to an IRA, Archer MSA, or HSA. The person collecting this form uses the information on the form to file information returns with the IRS, reporting the above information. Routine uses of this information include giving it to the Department of Justice for civil and criminal litigation and to cities, states, the District of Columbia, and U.S. commonwealths and territories for use in administering their laws. The information may also be disclosed to other countries under a treaty, to federal and state agencies to enforce civil and criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism. You must provide your TIN whether or not you are required to file a tax return. Under section 3406, payors must generally withhold a percentage of taxable interest, dividends, and certain other payments to a payee who does not give a TIN to the payor. Certain penalties may also apply for providing false or fraudulent information.

Submit the Bid electronically as described in the Solicitation.

Company Name: J.B. Coxwell Contracting, Inc.

Company's Address: 6741 Lloyd Rd W. Jacksonville, FL 32244

License Number: CGC059919 General Contractor; CUC1225959 Underground Utility & Excavation

Phone Number: (904)786-1120 FAX No: (904)783-2970 Email Address: estimating@jbcxwell.com

BID SECURITY REQUIREMENTS

- ☐ None required
☒ Certified Check or Bond (Five Percent (5%))

TERM OF CONTRACT

- ☐ One Time Purchase
☐ Annual Requirements
☒ Other, Specify - Project Completion

SAMPLE REQUIREMENTS

- ☒ None required
☐ Samples required prior to Bid Opening
☐ Samples may be required subsequent to Bid Opening

SECTION 255.05, FLORIDA STATUTES CONTRACT BOND

- ☐ None required
☒ Bond required 100% of Bid Award

QUANTITIES

- ☐ Quantities indicated are exacting
☒ Quantities indicated reflect the approximate quantities to be purchased throughout the Contract period and are subject to fluctuation in accordance with actual requirements.

INSURANCE REQUIREMENTS**Insurance required**

PAYMENT DISCOUNTS	
☐ 1% 20, net 30	
☐ 2% 10, net 30	
☐ Other _____	
☐ None Offered	
ENTER YOUR BID FOR SOLICITATION 1412069448	
TOTAL BID PRICE	
Total Bid Price (Enter total from cell G29 in the Bid Workbook):	\$ 2,978,781.00

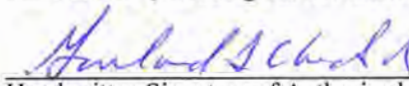
☒ I have read and understood the Sunshine Law/Public Records clauses contained within this solicitation. I understand that in the absence of a redacted copy my proposal will be disclosed to the public "as-is".

BIDDER CERTIFICATION

By submitting this Bid, the Bidder certifies that it has read and reviewed all of the documents pertaining to this Solicitation, that the person signing below is an authorized representative of the Bidding Company, that the Company is legally authorized to do business in the State of Florida, and that the Company maintains in active status an appropriate contractor's license for the work (if applicable). The Bidder also certifies that it complies with all sections (including but not limited to Conflict of Interest and Ethics) of this Solicitation.

We have received addenda

1 through 1


 Handwritten Signature of Authorized Officer of Company or Agent

01/13/2026

Date

Garland F. Chick, Jr., Vice President of Estimating
 Printed Name and Title

1412069448 Appendix B - Bid Workbook Blacks Ford Water Reclamation Facility to Veterans Parkway Reclaim Water Main Project (Complete cells in yellow only)	
Company:	J B Coxwell Contracting, Inc

NOTE: Unless otherwise noted, Column B refers to paragraphs/sections found in the latest edition of JEA's Water & Sewer Standards Manual or the Project Technical Specification. JEA's Water & Sewer Standards Manual can be found on www.jea.com
**Refer to Appendix A - Technical Specifications*

Item	JEA W/WW Standards Manual M&P	Description	Est. QTY	UOM	Unit Price	Ext. Price
1	801.XXI.1	24-inch DI CL250 (w/restrained joints)	3660	LF	\$ 283.00	\$ 1,035,780.00
2	801.XXI.4	Polyethylene wrap	3660	LF	\$ 2.50	\$ 9,150.00
3	801.XXIII.1	30" HDPE DR-11 (DIPS) HDD	2376	LF	\$ 426.00	\$ 1,012,176.00
4	801.XXIII.2	30" HDPE DR-11 (DIPS) HDD Adapter	4	EA	\$ 10,775.00	\$ 43,100.00
5	801.XXI.2	24-inch 90-degree bend DI, MJ (w/meg-a-lugs)	1	EA	\$ 6,550.00	\$ 6,550.00
6	801.XXI.2	24-inch 45-degree bend DI, MJ (w/meg-a-lugs)	14	EA	\$ 5,450.00	\$ 76,300.00
7	801.XXI.2	24-inch 11.25-degree bend DI, MJ (w/meg-a-lugs)	4	EA	\$ 5,050.00	\$ 20,200.00
8	801.XXI.2	30-inch X 24-inch DI MJ Reducer	4	EA	\$ 5,100.00	\$ 20,400.00
9	801.XXI.2	24-inch X 24-inch Tee DI, MJ	5	EA	\$ 7,650.00	\$ 38,250.00
10	801.XXII.1	24-inch gate valve and box (w/meg-a-lugs)	9	EA	\$ 25,500.00	\$ 229,500.00
11	801.XXII.5	Flushing valve (w/meg-a-lugs)	5	EA	\$ 4,250.00	\$ 21,250.00
12	801.XXII.3	Locate/meter box	4	EA	\$ 775.00	\$ 3,100.00
13	801.XXII.2	Cut in Connection to existing 24-inch RWM	1	EA	\$ 8,225.00	\$ 8,225.00
14	920 *	Grassing/Sodding	1	LS	\$ 36,550.00	\$ 36,550.00
15	925 *	Concrete bollard	16	EA	\$ 1,400.00	\$ 22,400.00
16	801.XXI.1	Temporary sample tap	2	EA	\$ 925.00	\$ 1,850.00
Subtotal:					\$	2,584,781.00

Testing Allowance:	\$ 7,000.00
Supplemental Work Authorization (SWA):	\$ 200,000.00

General Conditions (Max 10% of Subtotal) :	\$ 187,000.00

TOTAL BID PRICE (Enter this number on the Bid Form):	\$ 2,978,781.00

JSEB Requirement Overview	
Total Bid Price, less General Conditions, SWAs and Allowances:	\$ 2,584,781.00
JSEB Requirement (percent):	2%
JSEB Requirement (dollars):	\$ 51,695.62

APPENDIX B – RESPONSE FORM**1412080446 (RFP) Brandy Branch Generating Station B52-B53 SCR Catalyst Replacement**

Submit the Response electronically as described in sections 1.4 and 1.5 of the Solicitation.

Company Name: CORMETECH IncCompany's Address: 5000 International Dr. Durham, NC 27712Phone Number: 9 1 9 - 6 2 0 - 3 0 0 0Email Address: c.brown@cormetech.com**BID SECURITY REQUIREMENTS**

- ☐ None required
☒ Certified Check or Bond (Five Percent (5%))

TERM OF CONTRACT

- ☐ One Time Purchase
☐ Annual Requirements
☒ Other, Specify - Project Completion

SAMPLE REQUIREMENTS

- ☒ None required
☐ Samples required prior to Bid Opening
☐ Samples may be required subsequent to Bid Opening

SECTION 255.05, FLORIDA STATUTES CONTRACT BOND

- ☐ None required
☒ Bond required 100% of Bid Award

QUANTITIES

- ☒ Quantities indicated are exacting
☐ Quantities indicated reflect the approximate quantities to be purchased Throughout the Contract period and are subject to fluctuation in accordance with actual requirements.

INSURANCE REQUIREMENTS**Insurance required****PAYMENT DISCOUNTS**

- ☐ 1% 20, net 30
☐ 2% 10, net 30
☐ Other _____
☐ None Offered

Note prices below include material indexing. See proposal ID# 10683-246-0

	Base	Elite (Low dP)	Elite (Ext. Life)	Multi-Function
Removal and Installation of New Catalyst	██████	██████	██████	██████
Supply & Deliver Catalyst Only	██████	██████	██████	██████
Total Project Cost	\$1,201,000	\$1,197,000	\$1,287,700	\$1,791,200

☒ I have read and understood the Sunshine Law/Public Records clauses contained within this solicitation. I understand that in the absence of a redacted copy my proposal will be disclosed to the public "as-is".

RESPONDENT CERTIFICATION

By submitting this Response, the Respondent certifies that it has read and reviewed all of the documents pertaining to this Solicitation, that the person signing below is an authorized representative of the Responding Company, that the Company is legally authorized to do business in the State of Florida, and that the Company maintains in active status an appropriate contractor's license for the work (if applicable). The Respondent also certifies that it complies with all sections (including but not limited to Conflict of Interest and Ethics) of this Solicitation.

We have received addenda

_____ through _____



12/15/2025

Handwritten Signature of Authorized Officer of Company or Agent

Date

Caleb Brown, Business Development Manager

Printed Name and Title:

APPENDIX B – RESPONSE FORM**1412080446 (RFP) Brandy Branch Generating Station B52-B53 SCR Catalyst Replacement****Catalyst Bid Form: Performance Guarantees**

Proposal Description		Base	Elite (Low dP)	Elite (Ext. Life)	Multi-Function
NOx Conversion Rate	%	≥ 61%	≥ 61%	≥ 61%	≥ 61%
CO Conversion Rate	%	NA	NA	NA	≥ 50%
Ammonia Slip	ppm	5	5	5	5
Catalyst Differential Pressure	in H2O	1.8	1.2	1.4	1.3
Catalyst Activity	%	--	--	--	--
Catalyst Activity / Functional Service Life (KO / KE)	%	Propriety	Propriety	Propriety	Propriety
Catalyst Life, years	years	5	5	10	5
Mechanical Service Life of the Catalyst	years	1	1	1	1
19% Aq. NH3 Consumption (Not guaranteed, only expected)	lb / hr	210	210	210	210

Base: Replacement like in-kind. Not staggered or pleated configuration.
 Elite (Low dP): Pleated module configuration with lower pressure drop
 Elite (Ext. Life): Pleated module configuration with lower pressure drop and extended life
 Multi-Function: NOx and CO reduction in a single layer, pleated module configuration.

Guarantees established by bidders.

Guaranteed performance is based on:

- Cormetech, Inc., Technical Terms and Conditions (Proposal # 10683-246-0).
- Design Conditions found in proposal # 10683-246-0.

APPENDIX B – RESPONSE FORM

1412080446 (RFP) Brandy Branch Generating Station B52-B53 SCR Catalyst Replacement

THE MINIMUM QUALIFICATIONS SHALL BE SUBMITTED ON THIS FORM. IN ORDER TO BE CONSIDERED A QUALIFIED BIDDER BY JEA YOU MUST MEET THE MINIMUM QUALIFICATIONS LISTED BELOW, AND BE ABLE TO PROVIDE ALL THE SERVICES LISTED IN THIS SOLICITATION.

THE BIDDER MUST COMPLETE THE BIDDER INFORMATION SECTION BELOW AND PROVIDE ANY OTHER INFORMATION OR REFERENCE REQUESTED. THE BIDDER MUST ALSO PROVIDE ANY ATTACHMENTS REQUESTED WITH THIS MINIMUM QUALIFICATIONS FORM.

BIDDER INFORMATION

COMPANY NAME: CORMETECH Inc.

BUSINESS ADDRESS: 5000 International Dr.

CITY, STATE, ZIP CODE: Durham, NC 27712

TELEPHONE: 919-620-3000

FAX:

E-M AIL: sales@cormetech.com

PRINT NAME OF AUTHORIZED REPRESENTATIVE: Caleb Brown

SIGNATURE OF AUTHORIZED REPRESENTATIVE:



NAME AND TITLE OF AUTHORIZED REPRESENTATIVE: Business Development Manager

MINIMUM QUALIFICATIONS:

Respondent must meet the following Minimum Qualifications to be considered eligible to have its Response evaluated by JEA. Respondent must complete and submit the Minimum Qualification Form provided in this Solicitation. Respondents that are working or have worked for JEA in the past 2 years involving similar work must submit JEA as a reference. JEA reserves the right to ask for additional back up documentation or additional reference projects to confirm the Respondent meets the requirements stated above.

JEA in its sole discretion may reject Responses from Respondents not meeting all of the following Minimum Qualifications:

1. The Respondent is not on the State of Florida Convicted Vendor List, State of Florida's Suspended Vendor List, The City of Jacksonville's Disqualified Vendor List, have not had their bidding privileges actively suspended by JEA, been debarred by JEA, or have had a contract with JEA terminated for default within the last two (2) years.
2. The respondent must have a minimum of three (3) years of demonstrated experience in the removal and installation of SCR catalyst systems. In addition, the catalyst manufacturer must possess at least three (3) years of proven experience in the production of SCR catalysts. The respondent must have successfully completed comparable projects within the past five (5) years. "Comparable projects" are defined as SCR catalyst replacements valued at \$500,000 or more within a 125 MW or larger combined cycle SCR catalyst system. To substantiate this experience,

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the respondent shall provide up to three (3) verifiable reference projects.

1. REFERENCE

Reference Name: Mike O'Connor

Reference Phone Number: 513-312-4782

Reference Company Name: Vistra Energy

Address of Work: Vistra Corporate Location

Reference E-Mail Address: mike.o'connor@vistracorp.com

Dates of Work/Number of Sites: Multiple

Description of Work including contract value: Mike is the Principle Engineer at Vistra Energy. He has consulted on many catalyst replacement turnkey jobs where CORMETECH supplied catalyst along with tull turnkey service. Jobs within the last 4 years include:

Fayette Turnkey (2024) - 2 unit catalyst supply with full turnkey installation. (\$1.4 mil)

Lake Hubbard (2024) - 1 unit catalyst supply with full turnkey installation (\$900k)

Midlothian (2023) - 1 unit catalyst supply with full turnkey installation (\$1mil)

2. REFERENCE

Reference Name: Zach Stillinger

Reference Phone Number: 864 - 492 - 7876

Reference Company Name: Kings Mountain Energy Center

Address of Work: 181 Gage Rd Kings Mountain, NC 28086

Reference E-Mail Address: zach.stillinger@kmecpower.com

Dates of Work/Number of Sites: March 2025

Description of Work including contract value: CORMETECH replaced a competitors catalyst at KMEC. Full turnkey installation service was awarded. CORMETECH also provided engineering, supply and installation of a AIG tuning grid on this project along with the traverse tuning of the AIG grid. Value was over \$1mil.

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3. REFERENCE

Reference Name: Terence Robertson

Reference Phone Number: 612 - 685 - 5166

Reference Company Name: Calpine Corporation

Address of Work: Calpine Corporate Office

Reference E-Mail Address: Terence.Robertson@calpine.com

Dates of Work/Number of Sites: Multiple

Description of Work including contract value: Terence is the Director of Mechanical Services at Calpine and is very familiar with CORMETECH'S product and services offerings along with many members of our Field Service Team. CORMETECH supplies the majority of the catalyst replacements at Calpine. Services provided to Calpine include catalyst testing, inspections, catalyst cleaning and other on-site services. There are too many jobs to list however multiple units of catalyst was recently supplied to KIAC, Bethlehem, and York plants.

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LIST OF SUBCONTRACTORS

JEA Solicitation Number 1412080446 requires certain major Subcontractors be listed on this form, unless the work will be self- performed by the Company.

The undersigned understands that failure to submit the required Subcontractor information on this form will result in bid rejection, and the Company agrees to employ the Subcontractors specified below: (Use additional sheets as necessary)

Note: This list of Subcontractors shall not be modified subsequent to bid opening, without a showing of good cause and the written consent of JEA.

Type of Work	Corporate Name of Subcontractor	Subcontractor Primary Contact Person & Telephone Number	Subcontractor's License Number (if applicable)	Percentage of Work or Dollar Amount:
Labor and equipment supply for catalyst replacement	Preferred Industrial Contractors	Chris Roper		NA


Signed: _____
Company: _____
Address: _____
Date: 12/5/2025

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LIST OF JSEB SUBCONTRACTORS**

The following JSEB Subcontractors will be utilized in fulfilling the terms and conditions of a Project Authorization arising from award of JEA - _____. I (We) the undersigned understand that failure to submit said information will result in bid rejection. I (We) will employ the JSEB Subcontractors specified below: (Use additional sheets as necessary)

Class of Work (Category) Dollar Amount	Name of JSEB Contractor (Indicate below)	Percentage of Total Job or

Signed:_____

Company:_____

Address:_____

Date:_____

Note: This list shall not be modified subsequent to bid opening without a showing of good cause and the written consent of the JEA.

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**CONFLICT OF INTEREST DISCLOSURE FORM**

*Disclosing a potential conflict of interest does not disqualify vendors. In the event vendors do not disclose potential conflicts of interest, and they are detected by JEA, vendor may be **disqualified** from doing business with JEA.*

Questions about this form? Contact (JEA, Buyer)

JEA Bid/Solicitation/Contract Number:	Name of JEA Employee(s) Working on Vendor's Current Contract(s) with JEA:	
Vendor Name:	Vendor Phone:	
Vendor's Authorized Representative Name and Title:	Authorized Representative's Phone:	
NAME(S) OF JEA EMPLOYEE(S) / PUBLIC OFFICER(S) WITH POTENTIAL CONFLICT OF INTEREST		
Name of JEA public officer(s), employee(s), or relatives with whom there may be a potential conflict of interest. If more than five, attach a second form.	Relationship of JEA public officer(s)/employee(s) and/or relative(s) to vendor's company from list above (e.g. 1(a), 2, etc.). Please list all that apply:	
1.		
2.		
3.		
4.		
5.		
☒ Vendor has no conflict of interest to report. ☒ Vendor hereby declares it has not and will not provide gifts or hospitality of any dollar value or any other gratuities to any JEA officer or employee to obtain or maintain a contract. ☒ I certify that this Conflict-of-Interest Disclosure has been examined by me and that its contents are true and correct to my knowledge and belief and I have the authority to so certify on behalf of the Vendor. Vendor's Authorized Representative Signature:  Date: 12/15/2025		

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FOR JEA USE ONLY IF CONFLICT NOTED

This form has been reviewed by:

Name of JEA Ethics Officer:	Signature:	Date:
Note:		