PERCHERON HEALTH, SAFETY & ENVIRONMENTAL EMPLOYEE MANUAL



"Safety Brings US Home" PERCHERON PROFESSIONAL SERVICES, LLC



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SUBPART A - SAFETY COMMITMENT AND RESPONSIBILITIES

PERCHERON SAFETY STATEMENT-COMMANDMENTS

August 1, 2020

In all locations where our employees work, Percheron LLC is dedicated to providing a workplace free from all known hazards. In order to meet this goal, we have a comprehensive and continuous safety program which has the full support of management. Percheron is committed to a perpetual cycle of assessing, evaluating, and eliminating health and safety risks which may be found where our employees perform their exceptional work. The Percheron Safety Program contains our policies and procedures, plans and forms, and our SAFETY COMMANDMENTS that we use to ensure the health and safety of our team. We will be a vital component in occupational health safety on all projects. Percheron requires the cooperation and participation of all employees. All employees will follow the Percheron Safety Commandments:

- We will drive undistracted.
- We will attend Safety Meetings & training sessions to prepare properly for our work.
- We will Observant, Identify and Eliminate Unsafe Conditions prior to work being performed.
- We will report all Unsafe Conditions, Near Misses, and Incidents immediately to our supervisors and the HSE Department.
- We will learn from Near Misses and Incidents to prevent recurrence of the same condition.
- We will adhere to the Percheron Drug & Alcohol Policies.
- We will exceed client and regulatory safety requirements.
- We will never put project timelines in front of the Health & Safety of our employees.
- We will strive to be industry leaders in Health, Safety & Environmental through continuous improvement to our policies and initiatives.
- We will use the appropriate PPE at all times.

Percheron, LLC

Trent Oglesby CEO of Percheron Professional Services LLC.



"Safety Brings US Home"

MANAGEMENT, LEADERSHIP AND EMPLOYEE INVOLVEMENT

Percheron LLC management commits necessary resources of staff, money, and time to ensure that all people on the worksite are protected from injury and illness hazards. Management will lead the design, implementation, and continuous improvement of the Percheron Safety Program.

All Percheron employees, at every level, play a role in our HSE Program and all employees have been empowered with the appropriate authority to carry out that role.

The Percheron Safety Committee (PSC) will be continually maintained. The purpose of the committee is to develop, implement, distribute, and regularly review the Safety Policies and Procedures for Percheron, review accident logs yearly, monitor safety programs and initiatives to manage the program effectiveness, and recommend program enhancements as necessary. The Safety Committee will consist of at least one Vice-President, (as Executive Management), the Corporate Safety Administrator, Program Administrators, and other assigned employees representing each business unit of Percheron. PSC will have at least five members. Responsibilities include:

- Analyzing accident investigation reports and trends and implementing action, if required.
- Conducting yearly audits/inspections to determine compliance with required safety rules, policies, and procedures.
- Reviewing results of the scheduled audits/inspections.
- Testing for compliance with Federal, State, and Local safety requirements.
- Presenting findings to the Percheron Executive Management.
- Coordinating safety activities, training, program administration, and equipment purchases.
- Reviewing investigation reports of accidents, near misses, and exposures and makes suggestions to management for the prevention of future incidents.
- Reviewing investigations of alleged hazardous conditions and submitting recommendations to assist in the evaluation of employee safety suggestions.
- Holding regular (at least quarterly) meetings and preparing written records of the meeting.
- Overseeing the safety/educational programs for on and off the job.
- Coordinating department safety interest and motivational programs.
- Monitoring Percheron Safety Program activities.

In addition to our safety program Percheron management team provides care to our employees in many ways.

- Providing drinking water when weather is hot.
- Providing weather related breaks or allowing for calculated delays in operation if inclement weather is present
- Providing the right to stop any job at any time if safety concerns are raised

On the following page is the Percheron, LLC Safety Statement executed by Trent Oglesby, CEO. This document summarizes the commitment to safety at all levels of management within Percheron.

INTENT/COMPLIANCE/RESPONSIBILITY

May 7, 2021

Percheron employees provide The Percheron Experience at various locations and at various levels of an organizational structure. The goal of Percheron is to perform our work in the safest manner possible for the benefit of all involved.

The intent of our Safety Program to enhance and supplement the safety and health standards required by federal, state, and local law; and to enhance and supplement the health and safety standards required by contract documents when Percheron is at any contractor-level, superior or inferior. The Percheron Safety Program was developed in accordance with Federal OSHA standards, and other rules and regulations where applicable. In the event of a conflict between applicable federal, state, or local health and safety laws, regulations, standards, or contract documents and our Percheron Safety Program, the more stringent requirement shall apply.

Justin Lyon, Managing Partner, Safety and Integrated Services is the Percheron Safety Program Administrator and maintains responsibility, authority, and overall accountability for the implementation of the Percheron Safety Program.

AUDIT STATEMENT

This procedure shall be audited on an annual basis in line with the Corporate requirements and external auditing determine a further review for improvements. Noncompliance to the corporate standards will be recorded as part of the internal audit process.

SUBPART B – REPORTING, RECORDKEEPING, AND INFORMATION

ACCESS TO EMPLOYEE TRAINING, MEDICAL AND EXPOSURE RECORDS

May 7, 2021

The purpose of this policy is to inform employees and their designated representatives of the process to access the employee's exposure and medical records if the employee has been exposed to a toxic substance or harmful physical agent in the workplace. Should an employee become exposed to a hazardous substance, Percheron recognizes the employees' right to all information available relating to the hazardous substances for which they have been exposed.

Definitions

The following are definitions that are specific to the purpose of this policy:

<u>*Employee:*</u> A current employee, a former employee, or an employee being assigned or transferred to work where there will be exposure to toxic substances or harmful physical agents.

<u>Designated Representative</u>: Specific to this policy, the Designated Representative is any individual or organization to whom an employee gives written authorization to exercise a right of access.

<u>Medical Record</u>: A record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician. Employee medical record includes the following:

- Medical and employment questionnaires or histories (including job description and occupational exposures)
- The results of medical examinations (pre-employment, pre-assignment, periodic, episodic) and laboratory tests (including X-ray examinations and all biological monitoring
- Medical opinions, diagnosis, progress notes, and recommendations
- Descriptions of treatments and prescriptions
- Employee medical complaints.

Employee medical record does not include the following:

- Physical specimens (e.g., blood or urine samples)
- Records concerning health insurance claims that are maintained separately from the employer's medical program and its records and not accessible to the employer by employee name or other personal identifier (e.g., social security number, payroll number, etc.)
- Records concerning voluntary employee assistance programs (alcohol, drug abuse, or personal counseling programs).

Exposure Record: A record documenting the amount of employee exposure to toxic substances and harmful physical agents. Examples include but are not limited to:

- Results of environmental (workplace) monitoring
- Results of biological monitoring

- Safety data sheets
- Any other record which reveals the identity (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.

Toxic substances and harmful physical agents may include but are not limited to the following:

- Metals and dusts such as lead and silica
- Biological agents such as bacteria, viruses, and fungi
- Physical stress, such as noise, heat, cold, vibration

<u>Biological Monitoring</u>: Continuous or repeated measurement of body tissues, cells (hair or fingernails), or fluids (blood or urine) to determine the extent of hazardous material absorption or accumulation. See also Environmental monitoring.

<u>Environmental Monitoring</u>: Continuous or repeated measurement of agents in the environment to evaluate environmental exposure and possible damage to living organisms. Tests typically include ambient air samples and surface wipe samples. See also Biological monitoring.

Responsibilities

Environmental Health and Safety:

- Develop, implement, and monitor the Medical and Exposure Records Access Policy in accordance with OSHA standard 29 CFR 1910.1020
- If requested, provide Percheron Employees with the OSHA standard, 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records,".

<u>Human Resources:</u>

- Maintain all medical and exposure records, biological and/or environmental monitoring records, or advise the employee of the records location.
- Provide access to these records in a timely manner and in accordance with the Human Resources
 policy and procedures. If Percheron cannot reasonably provide access to the record within a
 timely manner (fifteen working days), the employee or designated representative shall be notified
 of the reason for the delay within the fifteen working days.
 - Personal identifiers (name, address, social security number, payroll number, etc.) are removed from records before access is granted

<u>Employee</u>

- Employee or designated representative shall request access to medical and/or exposure records from Human Resources or the Environmental Health and Safety Department.
- Records shall either be made available to the employer or designated representative at no cost or loaned to the employee for a reasonable time to enable a copy to be made.

Recordkeeping and Security

Percheron shall maintain exposure and medical records for employees who are exposed to toxic substances or other harmful physical agents while in the work environment, and these records must be available to employees upon request.

- Percheron shall preserve and maintain employee training, medical and exposure records for the duration of employment plus 30 years. Employee medical and exposure records shall be considered confidential information.
 - Exception: The 30-year rule does not apply to health insurance claims records maintained separately from the employee's medical records, first aid records of one-time treatment for minor injuries if made on-site by someone who is not a physician and if maintained separately from the employer's medical program, and records of employees who worked for the company less than one year and who took their records upon termination
- Medical and exposure records will be kept in a secured location (e.g. Stored in a locked cabinet or electronic file with only access allowed to authorized employees.

Employee Notification

Percheron employees will be notified of their right to access their individual exposure and medical records upon hiring and annually thereafter. The notification shall include the following information:

- The employee's right of access to the records
- The existence, location, and availability of employee records for exposure to toxic substances or harmful physical agents.
- The person(s) responsible for maintaining and providing access to records.

Notification may be distributed during annual training sessions and safety meetings, in an annual letter to all employees, through the company Sharepoint site, bulletin board postings, or any other communication method that is appropriate.

Employee Record Access

- All records shall be made available to an employee or designated representative upon request by submitting a Request for Medical and Exposure Records Access form available from Human Resources.
- Federal and State government representatives such as OSHA or NIOSH, shall have immediate access to all records upon request.

Record Retention Requirements Should Cessation of Business Occur:

Should Percheron cease to continue to do business, Percheron shall:

- Transfer all records subject to this section to the successor employer; OR
- If there is no successor employer to receive and maintain the records Percheron will notify the affected current employees of their rights of access to the records at least three (3) months prior to the cessation of the employer's business.

BULLETIN BOARD

All Percheron Facilities will have an employee information board with all required Federal and State Notices. All employees will also have online access to the required notices through Microsoft Teams at <u>EE-Bulletin-Board</u>. These notices include but are not limited to Employee Rights, Whistleblower Protection, Equal Employment Opportunity and workers compensation coverage.

COMMUNICATION

July 9, 2018

Percheron 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 are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe work environment, regardless of where that work environment may be located.

Our system of ensuring that all workers comply with the rules and maintain a safe work environment includes:

- Informing workers of the provisions of the Percheron Safety Program;
- The complete Percheron Safety Program shall be made available to all employees in writing
- Having each employee sign and date a log showing they have read and understood the Safety Program;
- Informing and training employees on client specific safe work practices and written operating
 procedures prior to performing operations. (All employees must respect the confidentiality of both
 Percheron and/or Client process safety information when it is released for training and
 informational purposes);
- Evaluating the safety performance of all workers;
- Recognizing employees who perform safe and healthful work practices;
- Providing retraining to workers whose safety performance is deficient;
- Disciplining workers, up to immediate termination for extreme cases, for failure to comply with safe and healthful work practices.

Client Communication:

- All first Aid and Recordable Injuries will be reported to clients within 24 hours of the incident occurring
- All first Aid and Recordable Injuries will be reported to clients per the clients request or standard (Weekly, monthly, quarterly, or yearly)
- Any unique hazard(s) presented by Percheron work performed will be reported to clients in a timely manner to prevent risk of injury or illness to workers onsite
- All compliance databases will be kept current so clients can review Percheron statistical data at any time

We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. Percheron employees will participate in project team safety meetings or will conduct our own, if necessary. 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 the following items:

- New employee orientation including a discussion of safety and health policies and procedures, including any JSA's hazardous materials/operations that may be in use or in the work area.
- Review of the Percheron Safety Program.
- Workplace safety and health training programs.
- Attendance at project team regularly scheduled safety meetings or the conduct of Percheron safety meetings -- reviewing minutes/materials from these meetings and having an opportunity to discuss meeting materials will be considered attendance.
 - All safety minutes will be sent into Percheron HSE department and client if requested
- Effective communication of safety and health concerns between workers and supervisors, including translation where appropriate.
- Posted or distributed safety information, including this Program and specific parts of this Program (hazardous chemicals/SDS and blood-borne pathogens exposure controls).
- A system for workers to anonymously inform the management team about workplace hazards.
- Communication with, and instruction to, employees orally about general safe work practices, and hazards unique to each employee's job assignment.
- Percheron Safety Email address for communicating directly with the Percheron Safety Committee, ask safety-related questions, make suggestions for safety topics/meetings, report non-emergency safety concerns.
- Dedicated 24 Hour, Toll-Free Safety Hotline for reporting serious or catastrophic incidents and/or any incident that occurs after at 1-866-839-1308
- Weekly Safety Emails to all Percheron staff on current topics impacting the workforce.

INCIDENT, NEAR MISS AND OBSERVATION REPORTING AND INVESTIGATION INCIDENT RESPONSE TRAINING

May 7, 2021

In the event of an accident requiring medical attention call 911 immediately. Follow the directions of the 911 operator.

In remote areas or under other circumstances, it may be necessary for other Percheron personnel to provide first aid, transportation, or other assistance until medical assistance is available. If transportation of an injury victim is required, then proper equipment for prompt transportation shall be used if available.

If an incident or accident occurs involving an injury, employees should contact Percheron's Medical Case Management Company (Axiom) at 877.502.9466. The Axiom Process is listed in Appendix A. Supervisors or Project Managers should be informed of both injury and non-injury related incidents or accidents as quickly as possible to begin the accident reporting procedures outlined elsewhere in the Percheron Safety Program.

All incidents, near misses and observations involving injury to employees, visitors, and/or damage to Percheron property will be reported using the applicable form from Appendix A to this Safety Program. Likewise, a near miss that could have caused injury or damage should be reported as well. It is the policy of Percheron to investigate all accidents (or near misses) involving any injury to employees, visitors to the company, and/or damage to Percheron property, and/or accidents involving company vehicles. Accidents will be investigated to the appropriate level depending on the severity of the incident.

Accident	Health	Safety Environment					
Classification	Illness	Injury	Personal Security	Driving	Equipment Products Assets	Information Security	Spill or Release
Observation No Loss to Percheron – Near Miss / Potential Hazard	An undesirable event, which under different conditions would result in an accident. A near miss does not result in any injury, illness, damage or loss to assets, environment, or third parties.						
Minor Losses to Percheron + Client ≤ \$ 5,000	Medical case, return to regular duties by next day	First AID, Medical case, return to regular duties by next day	<i>Minor</i> injuries caused by armed aggression	Damage to owned, rented/leased or contracted by Percheron traveling to or from the field.	Damage to Percheron equipment, products, and assets including damage to parked vehicle	Disclosure of hardware, access passwords, PIN numbers	Uncontrolled discharge of hazardous material outside of secondary containment below regulatory or client reporting thresholds
<mark>Serious</mark> \$ 5000 < Percheron + Client ≤ \$ 50,000	Any occupational illness involving hospitalization LTC >1 day DART >1 day	Any occupational injury involving hospitalization LTC >1 day DART >1 day	Serious injuries caused by armed aggression	Same as above and include collision to pedestrian, other vehicles, and third party properly	Damage to Percheron equipment, products, and assets including damage to parked vehicle	Loss of communication equipment or laptop with confidential data	Uncontrolled discharge of hazardous material outside of secondary containment above regulatory or client reporting thresholds
Catastrophic Losses to Percheron + Client > \$ 50,000	Fatality	Fatality Work related	Kidnapping and abduction with ransom	Vehicle Roll Over regardless of loss to Percheron	Damage to Percheron equipment, products, and assets including damage to parked vehicle	Virus infection across multiple locations causing significant business disruption	Discharge or disposal to water or land resulting in area evacuation or damage to wildlife

If an employee is injured at work, the primary goal is to have the employee receive the appropriate medical treatment, either as first aid or at a medical facility, as soon as possible and to protect other employees and equipment as necessary. Percheron has insurance for Worker's Compensation through the company's corporate insurance coverage. All employees will receive information regarding the plan and should use this as a guideline for receiving treatment in the event of a work-related injury/illness. If an employee does not want to receive medical treatment of any kind after the recommendation of Percheron, they may do so but must properly fulfill the Employee Waiver of Medical Treatment. If an employee goes forth with treatment, the employee and the supervisor will fulfill an accident/near miss form, the first report of injury or illness form, employee report and/or the Employee Waiver of Medical Treatment form, after the treatment is secured. Forms must be submitted to the Project Manager, manager, and the Managing Partner of HSE as soon as possible after an incident. The investigation into the circumstances of the accident or incident will be conducted after the forms have been submitted. The Project Manager will be supported and assisted by the appropriate level of Percheron Management with all aspects of the accident investigation.

All incidents must be reported in the required amount of time. If an incident is deemed serious or catastrophic or it occurs after hours a dedicated 24 Hour, contact Axiom at Toll-Free 877.502.9466 and Toll-Free Safety Hotline 1-866-839-1308 to report incidents. The safety hotline number will cycle through this list of Percheron employees until the call is answered.

Name of Employee	Title	Cell Phone Number
Justin Lyon	Managing Partner - Safety and	979-578-6383
	Integrated Services	
Michael Quin	Managing Partner	979-533-2102
Jeff Wilkie	Director, Surveying	281-813-1671

Initial report to Supervisor – 4 Hours Employee Incident Report / Witness Statements – 8 Hours Report to applicable regulatory agency(s) – 8 Hours Report to Client – 24 Hours Percheron Alert to entire company – 72 Hours

The primary goal of such an investigation is the prevention of future similar accidents. Additionally, information is compiled needed to prepare reports that may be required by federal, state, and local law, as well as the Worker's Compensation Insurance carrier, the liability insurance carrier, the company vehicle insurance carrier (if applicable), and our project partners.

Forms are available from the Project Manager or Office Manager or can be located in the Appendix II of the Safety Program. These and other safety related forms are also accessible on the Percheron Microsoft Teams Channel at: <u>PercheronTeamsSafetyChannel</u>. Employees shall report all incidents to their Supervisor along with the Accident Reporting Form. The Supervisor will immediately notify the Percheron Human Resources Department and Justin Lyon, Managing Partner, Safety and Integrated Services, via Email and immediately follow with a telephone call to ensure receipt. After hours reporting can be accomplished with the use of the Percheron Safety Hotline at 1-866-839-1308. The manager will begin

the investigation process appropriate with the severity of the incident as promptly as possible but not later than 48 hours following the incident. Before beginning an investigation, all emergency response needs must be completed, and the incident site must be safe and secure for entry and investigation. The supervisor will also begin collection of any evidence or details of the incident, such as: witnesses, weather conditions, surroundings, or any other information that may be relevant to the incident. Supervisors should ensure that they are prepared to document any evidence of the incident with photographic, audio recordings, ample note taking, and marking of the area. All equipment (paper, pens, marking tape, measuring tape, camera, audio recorder, etc.) required is typically available in any field office. All evidence should be documented and noted through photographs and notes depicting locations of personnel, equipment, etc. Such evidence should be protected from tampering and available to Human Resources or other individuals that may require access to the material. All interviews or statements taken in the course of an incident investigation shall be conducted in a suitable location and manner so as to be nonbiased. All interviews should be documented through note taking by the interviewer and audio recordings as well. Additionally, all interviews should include the option for follow-up interviews if warranted.

If involved in a non-injury accident, the employee shall provide written details of the accident to their Supervisor immediately. Upon completion of the accident investigation the affected employee will be contacted via Email by the investigator with an update as to findings and any other relevant or pertinent information.

Results of the investigation will be used to develop and implement corrective actions to prevent future incidents of the same nature by communicating them to all Percheron employees. Lessons learned will be reviewed and communicated. Changes to processes will be placed into effect to prevent reoccurrence or similar events. For automobile accidents, please refer to the section regarding Company Vehicles.

All Percheron employees will acknowledge that they have received a copy of the Percheron Safety Program, including the Safety Commandments, which contains Incident Reporting forms and procedures. Employees are required to actively participate in the safety program. Involvement shall include, but not be limited to, attendance in Percheron or project partner safety meetings, being aware of surroundings, and looking out for potential hazards at all times, communicating any potential hazards to management, notification of first responders in an emergency situation, and cooperating with incident investigations to the fullest extent possible. Managers will attend an annual manager's meeting and training that will provide further instruction on the procedures for incident response and incident investigation, as well as additional material that is timely or relevant with respect to incident response and investigation.

INCIDENT RESPONSE TRAINING

April 20, 2021

All Percheron employees will acknowledge that they have received a copy of the Percheron Safety Program, including the Safety Commandments, which contains Incident Reporting forms and procedures. Employees are required to actively participate in the safety program. Involvement shall include, but not be limited to, attendance in Percheron or project partner safety meetings, being aware of surroundings, and looking out for potential hazards at all times, communicating any potential hazards to management, notification of first responders in an emergency situation, and cooperating with incident investigations to the fullest extent possible. Managers will attend an annual manager's meeting and training that will provide further instruction on the procedures for incident response and incident investigation techniques. Training will include procedures contained in this manual for incident response and investigation, as well as additional material that is timely or relevant with respect to incident response and investigation.

INJURY AND ILLNESS RECORDKEEPING

Percheron is required to keep records of fatalities, injuries, and illnesses must record each fatality, recordable injury, and illness that:

- Is work-related; and
- Is a new case; and
- Meets one or more of the general recording criteria.

Each recordable injury or illness must be entered on an OSHA 300 Log and 301 Incident Report, or another 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 when found to be correct will sign the OSHA 300A Summary.

A copy of the annual summary will be posted in each establishment operated by Percheron and online on the Perhceron Safety Teams Site. This posted summary will not be altered, defaced or covered.

The annual summary will be reported online to OSHA by March 2nd and must be posted at each Percheron operated facility no later than February 1st of the previous year. The posting will be kept in place until April 30th.

The OSHA 300 Log, the privacy case list (if one exists), the annual summary, and the OSHA 301 Incident Report forms must be retained for five (5) years following the end of the calendar year that these records cover.

KEY PERFORMANCE INDICATORS (KPI)

These KPI's are developed by the HSE team to help Percheron improve our overall health and safety performance in all organizations. The guidance on measuring health and safety performance is organized under these main categories.

HSE KEY PERFORMANCE INDICATORS
Exposure Hours (including subcontractor hours)
Miles Driven
Fatalities (including Non-Accidental Deaths)
Lost Time Injuries
Recordable injuries (medical treatment beyond first aid, and restricted work
cases)
Near Miss incidents
First Aid Injuries / Clinic Visits
Observation Cards
First Aid Injuries / Clinic Visits
Security Incidents

SCHEDULE OF TRAINING AND SAFETY INSPECTIONS

July 9, 2018

The Percheron Health and Safety Committee, the Project Manager, the Project Coordinator, or the Party Chief (or combinations thereof) shall conduct periodic audits of safety equipment, tool condition, and vehicle safety inspections.

Specific safety meetings shall be weekly, and each meeting should contain a safety element. Additionally, all meetings within Percheron should begin with a "safety moment" provide by one or more meeting attendees.

Initial Safety training for all new employees shall occur before beginning work on the initial assignment. Retraining will be provided and required of all personnel upon a change in the type of workplace, when new or additional equipment such as PPE is required, or upon documented lack of use, improper use, or insufficient understanding of equipment.

Percheron Health Safety Environment department works closely with the Human resources and Operational teams to hire, coach, and develop the best employees using our Workforce management producer to ensure that all our employees put safety first in every they do and are at the utilized to the best of their abilities, so we can provide the best service to our clients.

Safety meetings and inspection attendance will be required by all Percheron employees. A record of attendance will be compiled and maintained at the Katy, TX Office. These records will include the employee name or other identifier, training dates, type(s) of training and training providers. This documentation will be maintained for at least one year. Periodic safety inspections will be performed when new substances, processes or procedures are present, when new hazards such as a potential fire or a toxic release are introduced or recognized, and when occupational injuries or illness occurs. Additionally, at the beginning of each new project, new job site or in the event of any change in location of the project, then the Project Manager must review, inspect, and anticipate possible hazards, and take proper safety precautions to reduce risk of injury, including but not limited to requiring the use of Personal Protective Equipment (PPE). A written assessment of hazards will be completed and signed by the Project Manager at the beginning of each project. Please see attached Appendix A for a copy of the Hazard Assessment Form. Any identified hazards will be documented, reviewed and discussed with all project team members at the beginning of the project and as required to advise team members of any hazards that are identified by routine audits or inspections. Hazards will be posted in a conspicuous area and addressed at a meeting of all project personnel. Any non-routine task that must be completed will be assessed for hazards prior starting the work. Any hazards that are identified will be documented and any employees required to perform such work will be trained in the safe operation of the work.

SUBPART C - POLICIES AND PROCEDURES

JOB COMPETENCY

July 9, 2018

Percheron has determined and documented the minimum gualifications required to perform each role within the company. These qualifications may be a combination of education, work experience or other qualifications as described for specific roles. Applicants to Percheron will submit a copy of their resume, transcripts, trainings, references, or other documents, to ensure applicants are qualified to perform their job duties. These documents will be obtained by the Percheron Manager or Executive responsible for hiring the applicant. All documents will be submitted to the Percheron Human Resources Department (HR) along with the New Hire Personal Action Form (PAF). Percheron HR Recruiting Manager will verify that all applicants are competent to perform the duties for which the applicant is being hired. Job specific training will be provided for new employees or employees transferred to new roles to ensure knowledge, competence and compliance of all Percheron Safety policies. All employees will be trained on the tasks they perform on a regular basis. Routine trainings of topics on the Percheron Safety Program will be held on a weekly basis. A record of training will be compiled and maintained, including the employee name or other identifier, training dates, type(s) of training, training providers and employee acknowledgement of the training received. The Supervisor, Party Chief, Project Manager, Recruiting Manager, Executive, or other will verify that an employee is competent to perform their roles and responsibilities before being allowed to work independently and without supervision. An organizational chart of the job titles/ roles in Percheron is available for reference if required by any employee. This organizational chart includes all levels of employees, including Executive Management and levels of employees to field level employees. Job descriptions and qualifications will be provided at the time of hire and prior to starting any work in Percheron offices or on Percheron projects.

RISK MANAGEMENT

In accordance with the Percheron's Risk Management Policy, these procedures describe Percheron's standard process for risk management, including:

- Risk identification
- Risk rating
- Risk controls
- Risk monitoring and reporting

A standard approach to risk management allows risks to be correctly prioritized across all operations, which in turns means that effective controls can be put in place to ensure Percheron is able to manage its operations effectively now and into the future.

The procedure applies to all activities undertaken in the course of business, on all Percheron or client locations.

Responsibilities

The HSE team retains the ultimate responsibility for risk management and for determining the appropriate level of risk that Percheron is willing to accept.

All Percheron employees shall diligently identify risks at a minimum prior to beginning work, especially during periods of change to processes, equipment or facilities and report them to their supervisor. All affected employees and subcontractors must participate in the risk assessment process and comply with all risk treatments.

Risk Identification

A structured approach to identifying the events that, if they were to occur, could have a negative impact on the company. Percheron utilizes daily JSA's and Hazard identification forms when needed to help prevent multiple types of risk to Percheron and our clients.

Key examples of risk to be identified on a daily basis to ensure Percheron and our Client take a little risk as possible.

- Driving (distracted driving)
 - HSE Manual Subpart F
- Slips/Trips/Falls
 - HSE Manual Subpart I
- Insect Bites (Ticks, spiders, etc.)
 - HSE manual Subpart O

- Hazardous Plants (Poison Ivy etc.)
 - HSE manual Subpart O
- Wooded Areas (e.g. falling tree limbs, brush that could scratch, snakes and other wildlife)
 - HSE manual Subpart O
- Remote Locations (portions of the work area are without cell phone reception)
 - HSE Manual Subpart K
- Working Alone
 - HSE Manual Subpart K
- Proper PPE utilized
 - HSE Manual Subpart L
- Proper incident reporting (incidents escalation prevention)
 - HSE Manual Subpart B
- Not performing safety meetings and daily JSA's
 - HSE Manual Subpart Q

2. Risk Rating

A process to analyze and understand each of the risks, including understanding what causes the risk to occur and what controls are already in place to manage the risk; risk assessment also determines:

- how severe a potential impact could be, and
- what is the likelihood of the Percheron being negatively impacted in this way.

Once the potential impact and likelihood have been assessed, the risk assessment process considers whether the risk is acceptable to the Percheron, or whether further treatments are required to further reduce the level of risk.

3. Risk Controls

Controls represent a whole range of actions, measures and strategies taken by management to eliminate or reduce risks. They include documenting policies and procedures, ensuring separation of duties in certain functions, including appropriate clauses in contracts, etc.

This process in determining risk controls includes, assessing the risk, assessing risk appetite and evaluating how to treat the risk through mitigating actions.

In assessing a risk, we firstly must give consideration of our risk appetite by making a risk assessment, this could include:

- avoid the risk
- mitigate the risk
- transfer the risk, and

• accept the risk.

A process should then be followed to identify efficient and effective ways to mitigate against the risk, this can occur by either:

- removing the risk
- reducing the likelihood of the risk impacting on the Percheron
- reducing the consequences if the risk were to occur, or
- a combination of these approaches.

4. Risk Monitoring and Reporting

Risk Rating

All identified risks shall be assessed to determine the overall ranking for the risk. Risks are ranked in the following three categories:

- High
- Moderate
- Low

The ranking of a risk determines:

- The nature of further action that is required, and the urgency with which further action should be undertaken.
- The reporting requirements for the risk, including who the risk is reported to.
- How the risk is monitored.

A common approach to risk ranking is necessary to ensure that the largest risks to the Percheron can readily be identified and management of risks can be prioritized in a way that has the greatest overall benefit to Percheron.

The following table shows how the consequences and likelihood of risks are assessed.

CONSEQUENCE TABLE

Category Consequence	Insignificant	Minor	Moderate	Major	Catastrophic
Reputation/ market disruption	Isolated complaints from individuals, and minor local media coverage.	Adverse capital city/state media coverage. Ongoing complaint.	USC loses market opportunity or some loss of reputation. Adverse national media attention. Minor political criticism. Issue raised with the Vice- Chancellor and President.	Reputation damage to USC or loss of major opportunity that has a major impact on the Percheron's operations. Major political criticism or Parliament Enquiry.	Will impact future business operations in catastrophic way. Continuous public criticism. Issue causes curtailment of Percheron's operations, works or critical projects.
Regulatory and legislative	Minor breaches by individual staff members.	Percheron Act infringements	Penalties for breach of Act or Legislation. Third part claims.	Major fines for breaches. Multiple third part claims.	Sever fines and/or prison sentences. Significant reduction in funding.
Environmental	Brief spill incident contained on site with no environmental harm.	Minor on site spill incident. Pollutant contained and cleaned up immediately.	Release of pollutant or environmental incident. Causing moderate environmental harm.	Large spill or environmental incident and significant associated cost.	Long-term environmental damage with ongoing liabilities and/or possible EPA closure of the Percheron for undisclosed period.
Safety	Treated with first aid.	Medical attention required.	Hospital treatment and possible serious permanent injury.	Loss of a life.	One or more fatalities or serious long- term impairment and inability to continue to work. Multiple loss of life

SUBPART D – DRUG AND ALCOHOL POLICIES

July 18, 2022

DRUG AND ALCOHOL POLICY

Since Percheron is committed to providing a safe workplace and committed to promoting high standards of employee health, the use or abuse of alcohol or drugs whether on or off the job which affects Percheron or jeopardizes employees will not be tolerated. Every employee shares the responsibility to support a drug, alcohol, and contraband free work environment.

Alcohol and/or illegal drugs on Percheron property or on a client's premises are strictly prohibited. All employees are subject to random drug testing. Refusal to submit to random drug testing or failure of a test is grounds for immediate termination, even for the first offense.

This section contains Percheron's Drug and Alcohol Policies. As a condition of employment, every employee must acknowledge and adhere to the Drug and Alcohol Policies found in the Percheron Employee Policy Manual.

The Drug and Alcohol Policies:

- 1. Percheron Corporate Drug and Alcohol Policy All Employees
- The Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) Drug and Alcohol Policy – Employees performing DOT PHMSA covered tasks.
- 3. NORTH AMERICAN SUBSTANCE ABUSE PROGRAM (NASAP) (LYONDELLE, (OLIN or DCCHA))
- 4. DCC ORAL FLUID SUBSTANCE ABUSE PROGRAM (DCCOF) (SHELL, DOW)
- 5. DCC HOUSTON AREA SUBSTANCE ABUSE PROGRAM (DCCHA) (MARATHON, PHILLIPS 66, (OLIN or NASAP))
- 6. DCC HAIR TESTING (DCCHT) (OLIN, DOW, MARATHON)

SUBPART E – VEHICLES

COMPANY OWNED OR LEASED VEHICLE SELECTION, INSPECTION AND MAINTENANCE

March 10, 2021

Proper selection and maintenance of vehicles and equipment are important aspects of this program. Reduced operational costs and accidents, from vehicle defects, are the direct result of a well-implemented maintenance program.

Vehicle Selection

Selection of vehicle begins with the understanding that the wrong equipment can result in excessive breakdowns, create hazards for personnel, incur costly delays, and contribute to poor service, and customer complaints. The Company will acquire vehicles designed for their intended use. Vehicles shall only be used as the manufacturer intended.

Leased vehicles used for work must be through an approved vendor. Each vendor, lease and purchase must be approved by the CFO of Percheron, LLC.

The employee responsible for the vehicle will inspect the vehicle daily, along with performing the 360 Check and monthly inspection, using the Vehicle Inspection Form. Prior to taking possession or transfer of any vehicle the appropriate inspection form needs to be completed and submitted to the project coordinator. Once completed the form should be forwarded to the Project Coordinator. More frequent, random inspections may be required by the Project Coordinator when deemed appropriate. Any problems requiring immediate attention should be reported to the Project Coordinator as they arise, so repairs can be completed in a timely fashion. Additionally, State Inspections are required on all vehicles by State law annually. It is up to the driver to ensure this inspection is performed, and forwards appropriate documentation and receipts to the Equipment Manager as verification.

Vehicle Maintenance

Vehicle maintenance can take the form of three distinct programs:

- Preventative maintenance
- Demand maintenance
- Crisis maintenance

While all three have their role in Vehicle Safety, the most cost-effective is preventative maintenance. The groundwork for a good preventative maintenance program begins with management. Management should set up a schedule for preventative maintenance to be performed on all vehicles, based on manufacturer specifications, and convey this schedule to all drivers.

Regular cleaning of interior and exterior must be done daily for any vehicle being used for company business. All items in the vehicle must be secured.

Preventive Maintenance is performed on a mileage or time basis. Typical preventative maintenance includes the following:

- Oil/filter changes
- Lubrication
- Tightening of belts and components
- Engine tune-ups
- Brake work
- Tire rotation
- Hose inspection/replacement
- Radiator maintenance
- Interior and Exterior Cleaning

Demand Maintenance is performed only when the need arises, such as when parts fail. Demand maintenance may include the following:

- Lights bulbs
- Headlights
- Window glass
- Gauges
- Wiring
- Airlines
- Tires
- Universal joints
- Bushings
- Batteries
- Engine noise/hesitation
- Transmission noise/hesitation

Crisis Maintenance involves a vehicle breakdown while on the road. Although situations of this type may happen regardless of the quality of the Preventative Maintenance program, it is an expensive alternative to not having an effective preventative maintenance program in place. Most Crisis Maintenance can be minimized by proper preventative maintenance.

When equipment is defective it must be removed from service, reported to equipment management, and not used until repaired or replaced.

Recordkeeping

All drivers will forward all receipts for maintenance and repairs each month to the equipment Manager. A current inventory list of the company's equipment and a log will be kept ensuring preventative maintenance is being performed according to the schedule established set by the manufacturer and industry standards. Records will be maintained for the life of the equipment.

HELPFUL WEATHER-RELATED VEHICLE MAINTENANCE TIPS

- 1. Remove your winter tires and rotate all-season radials-If you have winter tires, it's time to store them away. If you don't have winter tires, it's equally important to have all-season tires rotated or switched out for new ones.
- 2. Brake check After a blistering winter, be sure to check your brakes. Warning signs include excessive grinding, squealing, screeching or chatter.
- 3. Wiper blades check Wipers work hard over the winter months, wiping away dirt and debris on your windshield. Replace them in the spring before a shower makes it difficult to see.
- 4. Clean the underbody In addition to washing the exterior, be sure to spray the underbody of your vehicle and underneath the rear and front bumpers to rinse away any salt build-up, which can lead to erosion and rust. Use a high-pressure sprayer or garden hose for best results.
- 5. Apply a protectant Any vinyl surface, such as the seats and the steering wheel, is susceptible to cracking, sun damage, and fading-so be sure to apply a protectant at the beginning of the season and touch-up regularly.
- 6. Change your oil Give some thought to the kind of motor oil you have in your engine. Fully synthetic oils are specifically designed to protect your engine in hot weather while optimizing your engine's efficiency and reducing oil consumption.
- 7. Check all fluids In the winter months, fluids are easily depleted as your engine works harder in the colder weather. Make sure to check, top off or replace all fluids, including brake, transmission, coolant, power steering and windshield washer fluid.
- 8. Pressure test Assess the pressure of the cooling system and examine belts and hoses for wear or deterioration.
- 9. Interior clean-up Vacuum and be sure to throw away any unwanted garbage that has hibernated under your seats over the winter. Now is also the time to store your winter car mats in the garage.
- 10. Wash your car All vehicles regardless of the finish (clear coat, acrylic, enamel, etc.) require regular washing throughout the year. To preserve your car's shine and protect the surface, wax your vehicle once it has dried completely.

Driving During Winter

If you must drive during a winter storm, it is important to prepare your vehicle to reduce the chances of a weather-related incident and to prepare an emergency kit.

During the winter season, it is advisable to maintain at least a half tank of gas in the vehicle. Inspect the vehicle to ensure the following systems are operating properly:

- Brakes: Brakes should provide even and balanced braking. Also, check that brake fluid is at the proper level.
- Cooling System: Ensure a proper mixture of 50/50 antifreeze and water in the cooling system at the proper level.

- Electrical System: Check the ignition system and make sure that the battery is fully charged and that the connections are clean. Check that the alternator belt is in good condition with proper tension.
- Engine: Inspect all engine systems.
- Exhaust System: Check exhaust for leaks and that all clamps and hangers are snug.
- Tires: Check for proper tread depth and no signs of damage or uneven wear. Check for proper tire inflation.
- Oil: Check that oil is at the proper level.
- Visibility Systems: Inspect all exterior lights, defrosters (windshield and rear window), and wipers. Install winter windshield wipers.

Also, carry an emergency kit in the vehicle with the following items:

Emergency Kit Checklist			
Blankets/Sleeping Bags	Jumper Cables		
Cellular Telephone or Two-Way Radio	Snacks		
Windshield Scraper	Water		
Snowbrush	Roadmaps		
Tow Rope 12ft. 4500 Capacity	Screwdriver Set/Tools		
Flashlight with fresh/extra batteries	Signaling Cone		
Extra Winter Clothes	Tire Inflator		
Collapsible Snow Shovel	Two Light Sticks		
Tow Chain	Pair of Gloves		
Matches	Hand Warmers		
Traction Aids (Sand or Cat Litter)	Waterproof Matches		
Emergency Blanket	Emergency Flairs		

VEHICLE ACCIDENT REPORT AND RECORDKEEPING

Accident Analysis

The Company considers the elimination of motor vehicle accidents a major goal. To meet this objective, all accidents are to be reported to Management, investigated, documented, and reviewed. The procedure will begin as follows:

- Documentation of causes
- Management review to determine trends, recurring problems, need for further control measures, and to expedite corrective measures.

Recordkeeping

Adherence to recordkeeping and reporting procedures are the responsibility of both the driver and management.

- The driver will initiate the information gathering process as quickly and thoroughly as possible and forward to Management, verbally and in writing via the Vehicle Accident Report Form.
- Management will obtain accident data from the Driver by verbal communication and through the completed Vehicle Accident Report Form. It is important for Management to determine the extent of the accident, especially if it involves injury or death to the driver, passengers, or other parties. Management will immediately proceed with a thorough investigation to determine the underlying causes as well as what can be done to prevent similar accidents. The completed Accident Report Form will be forwarded to the Office Manager along with any supporting data (e.g. witness statements, photographs, police reports, etc.). This information will be forwarded to the appropriate Company vehicle insurance carrier by Management.

Employee Accident Reporting Procedure

Employees must take the following action(s) when there are injuries to persons and/or damage to vehicles or property.

- If possible, move the vehicle to a safe location out of the way of traffic. Call for medical attention if there are any injuries to persons.
- Obtain the names, addresses, and telephone numbers of all drivers, occupants involved and/or persons injured, as well as their driver's license number, insurance company name, policy number, and telephone number, and the name, address, and telephone number for any witnesses. Record this information on the Vehicle Accident Report Form.
- Do not apologize, admit fault, or sign anything for anyone, except an authorized agent of Percheron, LLC, a police officer, or representative of the company's automobile liability insurance carrier.
- Immediately notify Management at Percheron, LLC.
- Do not have the vehicle towed until Management indicates where to have it towed to.

• Do not have repairs started on the vehicle until Management or the Company's liability insurance carrier indicates where to have the vehicle repaired.

When there is theft or damage to the Company vehicle or contents only:

- If you did not witness the damage to the vehicle, contact the local police department immediately.
- Notify Management following the contact with the police.
- Send a copy of the police report along with a completed vehicle Accident Report Form, and any additional information, to the Office Manager.

VEHICLE POLICIES AND PROCEDURES

VEHICLE CHECKLIST

All Survey Field Crew Vehicles shall have the following safety equipment and information at all times:

- Company Gas Card
- Company Insurance Card
- Fire Extinguisher
- First-aid Kit and instructions
- Hard Hats for all crew members
- Orange or Lime Hi-Visibility Safety Vests for all crew members
- Reflective Triangles
- Flashlight
- Percheron 360 stickers affixed to the lower right corner of the driver's side window

The following additional equipment is required while working in Roadways and Highways:

- Orange Traffic Safety Cones
- Portable, flashing, highway safety light
- Traffic control signs and holders

All other Company vehicles shall have the following:

- Company Insurance Card
- First-aid kit and instructions
- Fire Extinguisher
- Orange or Lime Hi-Visibility Safety Vests for all crew members
- Reflective Triangles
- Flashlight
- Percheron 360 stickers affixed to the lower right corner of the driver's side window

ORGANIZATION AND RESPONSIBILITIES

Company Motor Vehicles and Trailers Policy

The following is Company Policy for Percheron, LLC owned motor vehicles and trailers when used by any employee. This includes all motor vehicles, off-road vehicles, boats, and trailers.

- It is the responsibility of the Party Chief or employee that is assigned the use of a Company vehicle to maintain the State vehicle inspection sticker as current and legal. Any damage or repairs needed that cause the vehicle to become unsafe or illegal to drive on the highway must be reported immediately and repaired as soon as possible. If the damage is caused by an accident, the driver must fill out a written accident/damage report and turn into the Field Crew Coordinator.
- It is the responsibility of the Party Chief or designated employee to check over trailers before they leave the field every morning and check for any unsafe broken parts such as hitches, safety chains,

broken ramp hinges, lights not working, license plates, and low tires. Any damage that is discovered should be reported to the Field Crew Coordinator, Field Supervisor or Project Manager immediately.

- Trailers that are missing hinge pins that could cause the ramp to fall off on the highway or if it is decided by the Field Crew Coordinator or Field Supervisor to be unsafe are to remain parked at the office until repaired.
- Trailers and/or vehicles missing license plates, having expired tags and/or inspection stickers will
 remain parked at the office until replacements or renewals can be obtained. It is the responsibility
 of the Party Chief or other designated employee driving the vehicle to make sure everything on the
 vehicle/trailer is legal with current registration before leaving the office. NO EMPLOYEES ARE
 ALLOWED TO REMOVE LICENSE PLATES FROM A VEHICLE OR TRAILER TO USE ON ANOTHER
 VEHICLE OR TRAILER THAT HAS LOST TAGS. This is illegal and any person doing so or instructing
 someone to swap tags will be responsible for all legal obligations.
- Loads shall be secure and shall not exceed the manufacturer's specifications and legal limits for the vehicle.
- Unauthorized personnel shall not be permitted to ride on equipment unless it is equipped to accommodate passengers safely.
- When the boat is taken out to be used on a project all rules apply to the trailer. The Party Chief or Field Supervisor should make sure that all the required safety equipment such as life vests, paddles, motor, and that Parks and Wildlife registration sticker is current and that he has the boat card.
- All trucks, UTVs and other motorized equipment should have the oil and other fluids checked at each refueling when in use, and all rules above apply to the trailer.
- Percheron requires all vehicles to have a working backup indicator. If a vehicle does not come equipped with a backup indicator, one should be installed prior to using the vehicle.
- Procedures issued by the vehicle manufacturer shall be reviewed and followed when fueling vehicles, including how to insert the nozzle to contact the tank, the type of fuel that should be used, and securing the tank lid to prevent fumes from leaking. All vehicles should be turned off and there shall be no smoking during fueling operations.
- All UTV's must be equipped with caution lights on top of the vehicle and have a reflective triangle visibly placed on the back of the vehicle.
- UTV's are not legal to drive on roadways. Drivers are not permitted to operate UTV's on roadways unless it is necessary to cross the road by making a clear 90-degree turn.

Management Responsibilities

- Establish Safety guidelines and monitor objectives to ensure compliance with the program
- Investigate and report all accidents involving a motor vehicle used in performing Company business, and forward all reports to the Office Manager
- Review all vehicle accident reports and make recommendations
- Ensure all drivers of company vehicles have a valid Driver's license
- Maintain appropriate records
Driver Responsibilities

- Always complete a 360 degree walk around before moving the vehicle.
- Always operate vehicle in a safe manner
- Ensure all passengers wear a seat belt prior to starting the engine and operating the vehicle
- Maintain a valid driver's license
- Ensure that a valid liability insurance card is in vehicle at all times
- Only let employees authorized by Management drive company vehicle
- Report all accidents involving company vehicle
- Maintain minimum insurance on personal vehicle(s) used for Company business
- Ensure routine maintenance is performed on company vehicle (i.e. oil change, car wash, etc.)
- Promptly report any safety issues with vehicle
- Comply with all items on the Vehicle Usage Agreement
- All individuals driving and/or riding in vehicles with an open cab such as a Utility Vehicle (UTV) must wear eye protection

VEHICLE USE

Company Owned

Employees authorized by Management will be permitted to operate a company vehicle. When the vehicle is driven for personal use, only the employee is permitted to operate the vehicle. No one under the age of 18 is permitted to operate a company vehicle on behalf of Percheron, LLC.

Rental Vehicles

Rental vehicles are to be leased from reputable leasing companies when needed for Company business/travel. All vehicle rentals will comply with the Percheron Travel and Entertainment Policy. Employees will be bound by the minimum driving age of the rental company regardless of the Percheron, LLC requirement.

Employees shall complete a 360 degree walk around before accepting the rental vehicle and before returning the vehicle to the leasing company. It is recommended the employees take pictures of the vehicle and document the vehicles condition prior to acceptance of the vehicle and upon return of the vehicle. Even if no damage occurred during the rental period, this is a best practice that should be followed. Pictures should be maintained for up to 6 months by the employee renting or driving the vehicle should a discrepancy with the leasing company occur.

Unauthorized Use of Vehicles

Assigned drivers and other authorized employees will not allow an unauthorized individual to operate a Company vehicle. **There will be no exceptions.** Additionally, if such unauthorized use results in an accident, the responsible employee will be required to make personal restitution for the damages and will be subject to appropriate disciplinary action.

Contract and Temporary Employees

Contract and temporary employees are required to comply with the requirements of this program. Failure to meet all requirements will result in the immediate loss of driving privileges on behalf of Percheron, LLC.

Cell Phone Use while driving

Percheron, LLC prohibits the use of "hands on" cell phones and handheld two-way radios while driving vehicles that are company-owned, rented, leased or personal during company business. This policy applies to all employees and contractors performing work for Percheron or its clients.

Texting and emailing on a cell phone or a mobile device are also prohibited while operating a vehicle during company business.

A vehicle is defined as any conveyance driven by a person such as automobiles, trucks, transporters, mobile cranes, forklifts, bundle carriers, golf carts, bicycles, all-terrain vehicles, and similar.

"Hands Free" communication is allowed but not recommended for company business. Hands Free is defined as making sure the mobile telephone is within close enough proximity that it is operable while the driver is restrained by properly installed and adjusted seat belts.

- Using an earpiece or the speaker phone function.
- Using voice-activated dialing.

Using the hands-free feature. To comply, a driver must have his or her mobile telephone located where he or she is able to initiate, answer, or terminate a call by touching a single button. The driver must be in the seated driving position and properly restrained by a seat belt. Drivers are not in compliance if they unsafely reach for a mobile phone, even if they intend to use the hands-free function.

SUBPART F – DRIVING

DRIVER SAFETY

New employees, contract employees, and temporary employees will receive a copy of this manual as part of their initial orientation. All assigned drivers are required to:

- Receive, review, and understand a copy of the Vehicle Safety Information
- Read, sign, and understand the Vehicle Usage Agreement
- Have a current and valid State Issued Driver's license with the proper endorsement of the vehicles operated.
- Present a copy of their valid Personal Vehicle Liability Insurance card
- Authorize review of their Motor Vehicle record (MVR)
- Authorize review of personal background screening if requested.
- Review operation and control of the vehicle assigned to them.
- Perform pre-operation/daily, monthly and return inspections of their vehicle and assigned equipment using the Vehicle Inventory Inspection form
- Maintain the interior and exterior appearance on a daily basis.
- Return or relinquish vehicles in the same condition or better than they were received in.
- Allowed "Hands Free" communication using cellular devices when required for company business while operating a vehicle for Pecheron Related business may be utilized but it is not recommended.
- Utilize Reverse Parking whenever possible.
- Only operate vehicles in manners they have been authorized too.
- Use and abide by the travel management plan document for trip planning.

Tickets, Violations, and License Suspension

Employees must notify the Office Manager immediately if they receive a ticket, are cited for a violation, or have their license suspended or revoked, or have any special driving conditions/restrictions added to the Driver's license.

All company employees operating a motor vehicle while on company business, must report all motor vehicle incidents and accidents immediately to their supervisor(s). In the event emergency services are required, they should be contacted first then the employee's supervisors. When applicable the company's insurance company will be notified.

An employee's driving privileges may be revoked with the Company for violations of any policies related to vehicle usage, for revocation or suspension of driver's license, and/or as required by the Company's automobile liability insurance carrier.

Three moving violations in 3 years will bar you from operating any company vehicle.

DRIVER SAFETY REGULATIONS

Seat Belts

The driver and all occupants are required to wear safety belts when the vehicle is in operation or while riding in the vehicle. The driver is responsible for making sure that all occupants comply with this policy. Children should not be in Company vehicles as a rule, but in the rare instance it may be necessary, any child under 4 years of age or under 40 pounds must be secured in a DOT-approved child safety seat.

Distracted Driving

Percheron has built a workplace culture of not being distracted in any manor while operating a vehicle while on company time.

- It is prohibited to text while driving. Vehicles "text-free zones"
- If you need to text or email pull over or wait until you have arrived at your destination.

Safe Use Of GPS Equipment

When using a global positioning system (GPS) in a vehicle, drivers will ensure:

- The GPS unit is equipped with hands-free navigation and is turned on prior to driving;
- The GPS unit is properly affixed to the vehicle prior to driving;
- The GPS is programmed prior to driving; and
- The vehicle is safely parked prior to making programming changes to the GPS unit.

Impaired Driving

The driver must not operate a vehicle when his/her ability to do so is impaired, affected by alcohol, illegal drugs, prescription drugs, or over the counter medications, illness, fatigue, or injury.

Traffic Laws

Drivers must abide by all federal, state, and local motor vehicle regulations, laws, and ordinances.

Vehicle Condition

Drivers are responsible for ensuring the vehicle they are driving is maintained in safe driving condition. Drivers of rental cars should check for and document obvious defects before leaving the rental lot, and if necessary, request a different vehicle if deemed unsafe by the employee. All rental cars should be equipped with air bags and ABS brakes, where applicable.

Cargo

All cargo transported on or in motor vehicles must be stored properly to prevent unintended movement and secured.

Motorcycles

Employees are prohibited from using motorcycles when traveling on Company business.

GENERAL SAFETY RULES

Only company authorized drivers will be allowed to operate company vehicles. Comprehension and skill levels of driver vary. An initial skills assessment will be performed to determine accuracy to skills required for safe operation. This includes securement of loads, connecting and removal of trailers and driving with connected trailers. An annual training will be required for all authorized drivers of any company vehicles.

Employees are not permitted to:

- Allow family members or other unauthorized persons to operate company vehicles.
- Pick up hitchhikers.
- Accept payment for carrying passengers and/or material.
- Push or pull another vehicle.
- Transport flammable liquids or gases, unless a DOT or Underwriters Laboratories approved container is used.
- Use burning flares. The preferred method is reflective triangles and LED Road Flashing Lights
- Assist disabled motorists or accident victims beyond their level of expertise. If a driver is unable to provide assistance and/or medical attention, the driver must restrict assistance and contact the proper authorities. Driver and passenger safety and well-being is to be protected at all times.

Company and Personal Property

Employees are responsible for Company property, such as computers, work papers, and equipment under their control while driving on behalf of Percheron, LLC. The Company will not reimburse an employee for stolen personal property while driving on behalf of the company.

FATIGUE MANAGEMENT

February 13, 2020

Initial training will be provided at the time of hire and shall be repeated annually. Training will be provided on how to recognize and control fatigue through appropriate work and personal habits, and the proper reporting of fatigue to supervision.

Work hour limitations will be set by Percheron and job rotation schedules will be managed to control fatigue. Time for sufficient sleep and increase mental fitness will be allowed to control employee turnover and absenteeism.

Workstation conditions will be improved through the use of ergonomic equipment such as anti-fatigue mats for standing, lift assist devices for repetitive lifting, proper lighting and control of temperature, and other ergonomic devices as deemed appropriate for the tasks to be performed.

Periodic evaluation and analysis of work tasks to control fatigue will be conducted.

Periodic rest breaks will be provided for personnel. Chairs or other seating will be provided to allow workers to sit during periodic breaks.

The program must address the roles and responsibilities of all employees in safety-critical positions. Employees are required to report fatigue/tiredness and lack of mental acuity to their immediate supervisor. Supervisors will make safety-critical decisions and take appropriate actions to prevent loss and injury. Supervisors shall contact Percheron management for guidance in any decision-making.

Chronic use over the counter or prescription drugs to increase mental alertness shall not be tolerated by. Employees are discouraged from taking any substance known to increase fatigue, including fatigue that sets in after the effects of the drug wear off.

LONG DISTANCE TRAVEL AND TIME MANAGMENT

July 9, 2018

The purpose of this procedure is to provide a travel safety system that will enable Percheron to ensure proper safeguards are in place for all business travel. Information and criteria outlined in this procedure should be used for all Travel Management Planning. Additionally, the methods to be used for monitoring travel and the responsible person for each type of travel are outlined in this procedure. This procedure applies to all Percheron Employees, Contractors, and Subcontractors undertaking work related travel.

Travel Management

From time to time, it may be necessary for employees to travel to and from projects or job sites that are great distances from their homes or current project locations. In these situations, it is incumbent upon all Percheron employees to schedule travel and coordinate their time of arrival to the new project, so as to not induce excessive or unnecessary fatigue. Long distance travel is identified as road trips involving any of the following criteria:

- Travel from office or location to a worksite if driving time exceeds 4.5 hours while using a company vehicle or being reimbursed for mileage or use or a personal vehicle.
- Frequent or significant hazards and/or security threats.
- Transportation of large scale, critical, or sensitive equipment.
- As determined or where required by a manager.
- Multiple vehicles and/or convoy operations.

Travel Management Requirements

Whenever long-distance travel is required, employees should plan any meeting or reporting times to allow for sufficient periods of rest during the trip and prior to the designated meeting time so that they are fully rested and prepared to perform any required functions. The following criteria will be applied when planning a trip on company business:

- A maximum of 12 hours is allowed within a rolling 24-hour period.
- A maximum of 14 duty hours within a rolling 24-hour period.
- A maximum of 4.5 hours driving time between breaks with a minimum of a 30-minute break. However, it is strongly recommended to take 15-minute break every two hours.
- Any trip requiring ten (10) or more hours in total trip time shall contain at least one (1) rest period being a minimum of eight (8) consecutive hours prior to continuing travel or to reporting to work.
- Driving travel distances exceeding 600 miles should not be undertaken in one day and should be divided into multiple days with rest periods of not less than eight (8) consecutive hours after each 600-mile segment.

• Any time required for trailer towing and set up should also be factored into trip planning and time management.

When driving long distances, signs of fatigue can occur such as trouble focusing or staying awake. If fatigue sets in you should pull off the road and get out of the vehicle for fresh air or take a power nap. If driving late at night, consider getting a hotel room. If two licensed drivers are in the vehicle, take turns driving. Get plenty of rest before beginning your journey.

Please note that while the safety and welfare of our employees is of the utmost concern to Percheron Management, we are also dedicated to providing quality service to our clients. Therefore, we ask that you understand that the above-referenced times and distances are guidelines and when the destination is within a reasonable travel time or distance, employees should not delay in reaching their destination and begin preparations for reporting to work to provide our clients The Percheron Experience.

Travel Safety Management Plan

Because travelling by road has been identified as the most dangerous form of transportation by the National Transportation Safety Board, it should be limited whenever possible. Other methods of transportation such as by air or train, should be considered when long distance travel is required to reduce the amount of driving for improved safety and efficiency. If it is determined that traveling by road is the best option, Percheron requires employees to complete and follow a Travel Safety Management Plan. The Travel Safety Management Plan is a written plan or process to assist reducing risks associated with employee travel.

Percheron requires employees to either complete the Travel Safety Management form located in Appendix A or submit an email with the following information listed in the table below:

Travel Safety Management Plan Information					
Employee Name	Employee Department	Trip Description			
Business Purpose	Origin	Destination			
Return Date/Time	Departure Date/Time	Vehicle Type			
Vehicle Owner	List of Passengers	Planned Destination Route			
Planned Route for Return	Expected Travel Time (Hours)	Driver's Cell Phone Number			
Expected Road Conditions/ Hazards	Driver's Emergency Contact Number	Destination Contact Number			
If the vehicle is equipped with a monitoring system.	The traveler has been informed of the Percheron "Driver Safety" Policy.	Expected Call-in Times			

The Travel Safety Management Plan should be reviewed with the driver before they perform any driving on company business. A copy of the "Travel Safety Management Plan" must be retained by the Driver's Safety Manager and copy given to the driver.

Communication Requirements

Drivers are required to carry a cell phone when travelling in case of an emergency. The cell phone number must be listed in the approved Travel Safety Management Plan. Cell phones should not be used when operating the vehicle unless a hands-free option is available. Otherwise drivers should stop the vehicle in a safe location away from traffic before using the cell phone.

During the Trip

- The driver is to remain on the predetermined route.
- The driver is to follow the call-in time requirements.
- If deviation from the Travel Safety Management Plan is necessary, the Driver is to notify the designated Travel Safety Manager as soon as contact can be safely made by phone or email.
- If the Driver does not make contact on time, the designated Travel Safety Manager is to continue to attempt to contact the Driver.
- When a Driver has not made contact within four (4) hours after the designated arrival time, Senior HSSE Management must be informed.
- The Travel Safety Manager and responsible Manager or Coordinator should remain on call to assist with emergency procedures as requested until the Driver is located.

Night Driving

Driving at night presents different and more risky challenges than driving during the day. Work must be planned to avoid the need for night driving, including circumstances where operations take place during the night. Management of night driving is a line responsibility. In the circumstance where night driving cannot be avoided, the driver's Safety Manager should be informed, and the following controls should be followed to help improve night vision.

- Slow down and take your time.
- Increase your following distance.
- Be aware of animals crossing the roads.
- Minimize glare by looking to the bottom right of the road to avoid approaching headlights.
- Use the night setting on your rearview mirror to deflect the glare from vehicles behind you.
- Turn off or dim interior lights.
- Keep your windows and windshields clean.

Adverse Weather Conditions

Extreme weather conditions such as rain, fog, ice, snow, and dust can affect your ability to see clearly and a vehicle's ability to function properly. Driving in adverse weather should be avoided when possible by reviewing the forecast ahead of time when planning your trip, allowing extra time for unforeseen inclement weather, and monitoring the weather conditions during rest stops to adjust your travel plan if needed. If unplanned stops or detours are taken from the original Travel Safety Management Plan to avoid adverse weather, the driver's Safety Manager must be notified of the change.

Driver's should ensure that they have a working cell phone and an emergency kit in the vehicle. (For a list of emergency kit contents and maintenance tips please review the section titled "Helpful Weather-Related Vehicle Maintenance Tips"). If there are extreme weather conditions expected, drivers should consider cancelling and/or rescheduling the trip.

Vehicle Breakdown

In the event of a vehicle breakdown, drivers are to inform the Safety Manager and local authorities (where appropriate) of their situation.

No Unattended Vehicles

- Drivers are to wait for help. Do NOT leave the vehicle unattended.
- Drivers are to exit the vehicle on the hard shoulder and sit away from it until help arrives (if the breakdown has occurred on the roadway).

Flat Tires: If a vehicle has a flat tire, the driver should only attempt to change the wheel if:

- The proper equipment is available.
- The driver is physically able and possesses the proper knowledge.
- The driver can park the vehicle in safe location off the road and on solid ground.
- Before resuming travel, the driver is to contact the Travel Safety Manager updating the status of the journey.

Roles and Responsibilities

Department / Project Manager

The responsibilities of the Department / Project Manager are to:

- Guarantee the integrity of the travel management system.
- Authorize the travel safety plan and any variations to the plan.
- Monitor the implementation and adherence to this procedure.
- Report violations and/or noncompliance issues to project management and HSSE for immediate corrective action (an HSSE incident "near miss" notification shall be generated for a violation of this procedure).
- Act as the primary point of contact or assigns a delegate.

Travel Safety Manager

The responsibility for travel safety management shall be with the supervisor authorizing the travel. The responsibilities of the Travel Safety Manager are to:

- Plan and monitor the Travel Management Plan according to this procedure using "Travel Safety Management Plan" found in Appendix A of this document.
- Be responsible for the traveler until the travel is complete.
- Effectively communicate with the traveler during travel.
- Closeout the Travel Management Plan upon completion.

Drivers

The responsibilities of all Drivers are to:

- Be licensed, properly insured and follow all requirements in the Percheron "Driver Safety" Policy.
- Not deviate from the planned / schedule route when following a written Travel Management Plan without first informing the Travel Safety Manager.
- Ensure the Travel Management Plan is immediately given to the Travel Safety Manager upon return from the trip.
- Be responsible for the safety of themselves, vehicle, load, and passengers.
- Drive safely in accordance with the Travel Management Plan.
- Report all start and stop times, deviations / changes, emergencies and completion of the trip to the Travel Safety Manager.

Passengers

The responsibilities of all Passengers are to:

- Follow the Driver's instructions.
- Ride only in approved vehicles.
- Wear seat belts and other required safety equipment.
- Ride only in the vehicle's provided seats—standing is not allowed.
- Not interfere with the Driver or distract the Driver's attention.
- Know and obey emergency procedures.
- Assist the driver as needed.

Employees

The responsibilities of all Employees are to:

- Practice safe work habits.
- Comply with the requirements of this procedure.

Compliance

Compliance with this procedure is monitored through workplace supervision, periodic site inspections, and other means of auditing, if required, by Percheron.

SUBPART G - EXIT ROUTES AND EMERGENCY PLANNING

EMERGENCY ACTION PLAN

April 20, 2021

1. Purpose

This plan has been developed for the safety and well-being of the Percheron employees, contractors, and clients. It identifies necessary management and employee actions to be taken during a fire or any other emergency. Education and training will be provided so that all employees know and understand the Emergency Action Plan (EAP).

2. Scope

This Standard applies to all employees, contractors, temporary employees or any third parties on the Company Premises in the United States that is performing any type of work or service to Percheron.

3. Definitions

Emergency – Situation resulting from an incident that has already taken place but has the potential to escalate further and cause additional damage to humans, environment, assets, or process.

Emergency Response Plan (ERP) – See Appendix A for example of the four-page form that is created by each local office and posted throughout the facility.

Emergency Response Team – The team responsible for responding to on-site emergencies. Emergency Response Team members will be posted throughout the office(s).

Muster point – A designated place or an area where all employees, assemble in case of an emergency.

4. Flowchart



5. Responsibilities

No		Task	Recommended Assignee	Frequency (Weekly, Monthly, Annually)
1.	1. 2. 3.	Understanding the principles of the Percheron EAP Maintaining control of the list of employees in their department Accounting for employees once evacuated	 All Supervisors / Managing Directors 	As needed
2.	1. 2.	Understanding the principles of the Percheron EAP Reporting all emergencies immediately	Employees	As needed
3.	1. 2.	Understanding the principles of the Percheron EAP Reporting all emergencies immediately	 Contractors & Third- PartyEmployees 	As needed
4.	1. 2.	Review these procedures for accuracy frequently with Operations Team. Conduct & document drills at least annually.	 Managing Partner of HSE 	Frequently or as needed; annually
5.	1.	Review these procedures for accuracy frequently.	 Emergency Response Team Managing Partner of HSE 	Frequently or as needed

6. Procedure

6.1. Location of Plans/Emergency Equipment

6.1.1. Regional Office Locations

Emergency Action Plan provides general information and generic procedures only. Employees must review the Emergency Response Plan (ERP) and Building Layout for their specific location. The ERP and building layout of Emergency Equipment can be found on bulletin boards throughout the facility and on the intranet. Employees must always know where onsite personal protective equipment is stored.

6.1.2. Field Office Locations

Employees must familiarize themselves with the Emergency Response Procedures for their current field location. This should be done immediately after arriving at the office.

6.1.3. New Offices

Once a new office is opened a new ERP must be created for that specific location and updated with all the local area information.

6.2. Reporting Emergencies

To report an emergency please remain calm and refer to posted local ERP guide **see Appendix A** or office Specific Procedures. To obtain a copy of the local plan, go to the Safety SharePoint page and look in the forms folder for Emergency Response Plan and choose your location or see your HSE Coordinator.

6.2.1. Rescue and Medical Duties

Please refer to the posted local ERP guide **see Appendix A** or office Specific Procedures.

- If serious injury, dial 911 and notify Emergency Response Team or Management (listed on ERP posted on the bulletin board in the office and on the intranet).
- Minor injuries notify Emergency Response Team or Management (listed on ERP posted onbulletin board and intranet).
- All incidents must be reported to HSE Department immediately.

6.2.2. Weather Related

Response to local weather conditions such as tornados, winter precipitation (snow & sleet), flooding, etc. will be at the discretion of the local manager. The options will include curtailmentof operations, suspension of operations or shelter in place.

6.2.2.1. Tornado/Severe Thunderstorm/Lightning

- If you sight a tornado or when a warning is issued, notify the Emergency ResponseTeam or Management.
- Turn off all equipment if safe to do so. Use caution around anything electrical

- Get to the innermost part of the building (in a room) on the lowest floor.
- Stay away from outside windows or walls.

6.2.2.2. Flood

- If indoors, follow instructions from Emergency Response Team or Management. Beready to evacuate.
- If outdoors, climb to high ground and stay there. Avoid walking or driving throughflood water. If car stalls, abandon it immediately and climb to higher ground.

6.2.2.3. Blizzard

- If indoors, stay calm and await instructions from the Emergency Response Team or Management. Stay indoors.
- If outdoors, find a dry shelter. Cover all exposed parts of the body. If you have cellphone service, call for help.
- If stranded in car or truck, stay in the vehicle. Run motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure exhaust pipe is not blocked. Make yourself visible to rescuers and exercise to keep blood circulating and to keep warm. If you have cell phone service, call for help.

6.2.2.4. Hurricane

See <u>HSE211-HurricaneResponsePlan-Rev1-02172021</u>

6.2.2.5. Emergency Shelter

- Having an emergency shelter in place is ideal, these can be used for many types of emergencies, such as weather, chemical or biological, workplace violence, etc.
- Each Percheron facility will conduct a risk assessment to identify the more likelyrisks for their location and plan accordingly.
- Basic Shelter in place procedures will be followed, however, specific proceduresmay apply for each location:
 - \circ $\;$ Get to the innermost part of building (in a room) on the lowest floor.
 - Stay away from outside window or walls.
 - Preferably behind a locked door for some situations.
- In the case of workplace violence, employees should seek the consultation of a medical professional if an incident of violence results in an injury or adverse condition which requires treatment.

6.2.2.6. Fire and Evacuation

Please refer to the posted local ERP guide **see subpart G**. To obtain copy of the plan, go to the Microsoft Teams Safety page and look in the forms folder for Emergency Response Plan and choose your location or contact the HSE Department.

- Pull fire alarm
- In a calm and orderly manner, locate the nearest emergency exit that offers safe passage and proceed to the designated muster points. DO NOT USE ELEVATOR for evacuation purposes.
- Call 911
- Inform Emergency Response Team or Management (listed on ERP posted in the office or on the internet).

6.3. Escape Procedures and Exit Routes

All exits will remain unlocked during working hours. All employees must exit the facility in a calm and orderly manner at the nearest emergency exit that offers safe passage. Be familiar with alternate emergency exits in your area. DO NOT use elevators during an evacuation.

6.4. Critical Office Operations

To minimize both the potential for harm to the employees and damage from the emergency, designated personnel are responsible for shutting down the listed operations, **if safe to do so:**

Office Manager or equivalent at location turn off all power equipment in the office.

As soon as the shutdown is complete, the employees who performed the Critical Officeshutdowns must take the nearest emergency exit that offers safe passage.

6.5. Accounting for Employees

After exiting the facility, all employees are to assemble for roll call at the muster points during the initial Emergency Notification. See your facility map for muster points. All managers are responsible for accounting for all employees in their department.

7. Training

During employee onboarding, the supervisor shall review those parts of the plan that they need to know in case of an emergency. Specific personnel are identified and trained to assist in the safe and orderly evacuation of employees. This committee is known as the Emergency Response Team. A record of this training will be maintained by the HSE Department and reviewed periodically for updating purposes.

The employer must review the plan with each employee whenever:

7.1. The plan is first developed,

- 7.2. The employee's responsibilities or actions change, or
- **7.3.** The plan is changed.

8. Emergency Warning / Notification System

In the case of emergency, each facility will notify their employees by alarms, strobes or air horn determined in their local ERP.

9. Further Information

For further information or explanation about any duties under the Emergency Action Plan, contact:HSE Department.

10. Quality records

The following records shall be generated, controlled, managed, and maintained.

Required Record	Custodian

11. Audit Statement

This Standard shall be audited on an annual basis unless operational requirements and external auditing determine a further review for improvements. Noncompliance to this will be captured and recorded in Percheron's Internal audit process.

EMERGENCY TELEPHONE NUMBERS





	Evacuation Plans
Fir	re Evacuation
IF	If the fire alarm is heard, evacuate the building immediately. DO NOT use elevators, always use the stairs.
Iŀ	If you are the last person in the room or building close the doors and windows behind you.
ŀ١	Go to the nearest exit, If the nearest exit is blocked go to an alternate exit.
ll•	Walk out and away from the building away from any glass or falling debris.
	If you are trapped, call 911 and give them your location.
11	Place something under the door to block any smoke from entering. If you have to move through flames: hold your breath and move quickly while covering your head and hair, keep your head
	down and close your eyes as much as possible.
11	Stop, drop and foil until the fire is out if your clothes catch fire.
I.	If first muster point is compromised by wind blowing smoke, debris or anything else towards the location group up and the secondary muster point. (Insert specific facility muster point)
ŀ	Everyone will remain at the assembly point until released by fire or police
ŀ	Severe Weather
ŀ	Take shelter in the lowest level of the building and in the center of the building. (Insert specific facility sever weather gathering point))
ŀ١	Stay away from windows and glass.
11	Stay near a sturdy wall.
11	Crouch down and cover your head with your hands.
11	Stay there until given the okay that the warning has cleared
ŀ	Active Shooter
ŀ	Step 1: Run- if there is an escape path, get out of the area
ŀ	Attempt to evacuate (Have an escape route in mind).
ŀ	Stay low to the ground.
II.	Help others escape if possible.
11:	Prevent others from entering the area.
11	Call 911 when in a safe position to do so.
1	Rep names visible to law emotement and follow any instructions they give you.
ŀ	Step 2: Hide- if there isn't a clear escape route
ŀ	Lock and block the door
ŀ	Hide behind large objects
ŀ	Always be prepared to move
ŀ.	Close, cover, and move away from windows
	Be quiet and still
Ι.	Stay in place until police arrive in your area or the "All clear" signal is given
•	Step 3: Fight- This is the last resort if there is no other option
•	Attempt to disarm or incapacitate the shooter
	Improvise objects as weapons
	Act appressively
	PERCHERON





PANDEMIC PREPAREDNESS

March 25, 2020

This plan is implemented by the corporate executives of Percheron administered by the HSE Department. Every Regional Director is assigned the ownership and responsibility of this plan.

Permanent and Project Offices

All Percheron Facilities will at a minimum be compliant to OSHA 1910.141 Requirements for the work being performed on site.

This includes but is not limited to the appropriate amount of water closets, hand-washing facilities and the appropriate number of items or equipment such as:

- Hand soap or Cleansing Agents
- Disposable Towels or Air-Drying Equipment

Illness Prevention

Annually all employees will be provided training on disease prevention on common illnesses. This training will include:

- Prevention of Illnesses
- Initial disease symptoms
- Appropriate time to return to work facilities.

Work Schedules

Percheron LLC will abide by all applicable Federal and State laws regarding absences from work.

• Employees that are able to work remotely will be permitted on a case-by-case evaluation performed by their supervisor.

Continuity of Business Lines/Service

By design Percheron is a company that through multi-discipline and comprehensive company that is able to continue service to all clients by cross-training and development. There will be no lapse in service to clients excluding Acts of God or major natural disasters.

Immunizations

Immunizations are a critical part of social health and wellbeing. When applicable employees will be notified of available immunizations and allowed time off for receiving the immunization as desired.

Communication

All employees are notified of companywide notices by electronic mail. Staff is allowed to discuss these notices with their supervisors and other responsible managers for clarity or comprehension. All key or emergency contacts are provided to staff upon hire or re-hire.

Similar to any emergency all staff is required to notify their supervisors of their personal status.

External communications with clients is always available from their Percheron point of contact. Major concerns will be addressed by executive staff.

Meetings

Gathering of staff and client required meetings will be addressed on an as needed basis. This determination will be done with recommendations from the Federal or State appointed bodies responsible for public health.

Facility Cleaning

Frequent hand contact areas will be cleaned periodically by company appointed staff or companies responsible for maintenance.

Program Review

This program will be reviewed annually at a minimum to ensure effectiveness and occupational requirements.

Following a pandemic event all related incidents will be reviewed, and root cause analysis will be performed by the HSE Department and the Percheron Cross Divisional Safety Committee within sixty days. Any modifications to policies will be made and distributed and available to all current staff of Percheron.

Training

All employees will be trained in the contents of the Pandemic Preparedness Policy.

Record Keeping

Training records will be maintained by the HSE Department for the employees term of employment plus 30 years.

SUBPART H – FIRE PREVENTION

FIRE PREVENTION PLAN

April 20, 2021

Objective

The purpose of this Fire Prevention Plan is to eliminate the causes of fire, prevent loss of life and property by fire, and comply with the Occupational Safety and Health Administration's (OSHA) standard on fire prevention, 29 CFR 1910.39. The plan helps employees recognize, report, and control fire hazards.

Background

Percheron LLC is committed to minimizing the threat of fire to employees, visitors, and property. Percheron LLC complies with all applicable laws, regulations, codes, and good practices pertaining to fire prevention. Percheron LLC's separate Emergency Action Plan outlines procedures for responding to fires. This Fire Prevention Plan reduces the risk of fires at Percheron LLC in the following ways:

- a) identifies materials that are potential fire hazards and their proper handling and storage procedures.
- b) distinguishes potential ignition sources and the proper procedures for control of those materials.
- c) describes fire protection equipment or systems.
- d) identifies people responsible for maintaining the equipment and systems installed to prevent or control ignition of fires.
- e) identifies people responsible for the control and accumulation of flammable or combustible material.
- f) describes good housekeeping procedures for ensuring control of accumulated flammable and combustible waste material and residues; and
- g) provides employee training about fire hazards they may encounter.

Assignment of Responsibility

Fire safety is everyone's responsibility. All employees should know how to prevent and respond to fires and should understand that they are responsible for adhering to company policy regarding fire emergencies.

Management - Management determines the Percheron LLC fire prevention and protection policies. Management will provide adequate controls to provide a safe workplace and will provide adequate resources and training to its employees to encourage fire prevention and the safest possible response in a fire emergency.

Plan Administrator – Justin Lyon, Managing Partner, Safety and Integrated Services, will manage the Fire Prevention Plan for Percheron LLC and will maintain all records pertaining to the plan. The Plan Administrator will ensure that the following is completed:

- 1. develop and administer the Percheron LLC fire prevention training program.
- 2. ensure that fire control equipment and systems are properly maintained.
- 3. control fuel source hazards; and

4. conduct fire risk surveys with the local fire department and other emergency responders and make recommendations.

Supervisors - Supervisors are responsible for ensuring that employees receive appropriate fire safety training and for notifying Justin Lyon, Managing Partner, Safety and Integrated Services, when changes in operation increase the risk of fire. Supervisors are also responsible for enforcing Percheron LLC fire prevention and protection policies.

Employees - All employees will:

- 1. complete all required training before working without supervision.
- 2. conduct operations safely to limit fire risk.
- 3. report potential fire hazards to supervisors; and
- 4. follow fire emergency procedures.

Plan Implementation

Good Housekeeping - To limit the risk of fires, employees will take the following precautions:

- 1. Minimize storage of combustible materials.
- 2. Make sure doors, hallways, stairs, and other exit routes are free of obstructions.
- 3. Dispose of combustible waste in covered, airtight, metal containers.
- 4. Use and store flammable materials in well-ventilated areas away from ignition sources.
- 5. Use only nonflammable cleaning products.
- 6. Keep incompatible (chemically reactive) substances away from each other.
- 7. Perform "hot work" (welding or working with an open flame or other ignition source) in controlled and well-ventilated areas.
- 8. Keep equipment in good working order; inspect electrical wiring and appliances regularly and keep motors and machine tools free of dust and grease.
- 9. Ensure that heating units are safeguarded.
- 10. Report all gas leaks immediately to Justin Lyon, Managing Partner, Safety and Integrated Services, who will ensure they are repaired immediately.
- 11. Repair and clean up flammable liquid leaks immediately.
- 12. Keep work areas free of dust, lint, sawdust, scraps, and similar material.
- 13. Do not rely on extension cords if wiring improvements are needed, and take care not to overload circuits with multiple pieces of equipment.
- 14. Ensure that required hot-work permits are obtained when necessary.
- 15. Turn off all applicable electrical equipment when not in use.

Maintenance - Justin Lyon, Managing Partner, Safety and Integrated Services will ensure that equipment is maintained according to manufacturers' specifications. Percheron LLC must also comply with requirements of National Fire Protection Association (NFPA) codes for specific equipment. Only properly trained people may perform maintenance work.

The following equipment is subject to maintenance, inspection, and testing procedures:

- 1. equipment installed to detect fuel leaks, control heating, and control pressurized systems;
- 2. portable fire extinguishers, automatic sprinkler systems, and fixed extinguishing systems;
- 3. detection systems for smoke, heat, or flame;

- 4. fire alarm systems; and
- 5. emergency backup systems and the equipment they support.

Types of Hazards

The following sections address the major workplace fire hazards at Percheron LLC's facilities and the procedures for controlling the hazards.

Electrical Fire Hazards

Electrical system failures and the misuse of electrical equipment are leading causes of workplace fires. Fires can result from loose ground connections; wiring with frayed insulation; or overloaded fuses, circuits, motors, or outlets.

To prevent electrical fires, employees will:

- 1. make sure worn wires are replaced;
- 2. use only appropriately rated fuses;
- 3. never use extension cords as substitutes for permanent wiring;
- 4. use only approved extension cords [those with the Underwriters Laboratory (UL) or Factory Mutual (FM) label];
- 5. check wiring in hazardous locations where the risk of fire is especially high;
- 6. check electrical equipment to ensure it is properly grounded or double insulated; and
- 7. ensure adequate spacing during maintenance.

Portable Heaters

All portable heaters must be approved by Justin Lyon, Managing Partner, Safety and Integrated Services. Portable electric heaters must have tip-over protection that automatically shuts off the unit when it is tipped over. A portable heater may only be plugged into a wall outlet and never into an extension cord or cubicle outlet. Allow adequate clearance between the heater and combustible furnishings or other materials at all times.

Office Fire Hazards

Office fires have become more likely due to increased use of electrical equipment, such as computers and copiers. To prevent office fires, employees must:

- 1. avoid overloading circuits with office equipment;
- 2. turn off and unplug nonessential electrical equipment, such as coffee pots, at the end of each workday;
- 3. keep storage areas clear of rubbish;
- 4. ensure that extension cords are not placed under carpets; and
- 5. ensure that trash and paper set aside for recycling is not allowed to accumulate.

Cutting, Welding, and Open-Flame Work

Justin Lyon, Managing Partner, Safety and Integrated Services will ensure the following when applicable:

- 1. All necessary hot work permits have been obtained before work begins.
- 2. Cutting and welding are done by authorized personnel in designated areas whenever possible.
- 3. Adequate ventilation is provided.
- 4. Torches, regulators, pressure-reducing valves, and manifolds are UL-listed or FM-approved.
- 5. Oxygen-fuel gas systems are equipped with listed or approved backflow valves and pressure-relief devices.
- 6. Cutters, welders, and helpers are wearing eye protection and protective clothing, as appropriate.
- 7. Cutting or welding is prohibited in sprinklered buildings while sprinkler protection is out of service.
- 8. Cutting or welding is prohibited in areas where explosive atmospheres of gases, vapors, or dusts could develop from residues or accumulations in confined spaces.
- 9. Cutting or welding is prohibited on metal walls, ceilings, or roofs built of combustible sandwichtype panel construction or combustible covering.
- 10. Confined spaces, such as tanks, are tested to ensure that the atmosphere is not more than 10 percent of the lower flammable limit before cutting or welding in or on the tank.
- 11. Small tanks, piping, or containers that cannot be entered are cleaned, purged, and tested before cutting or welding on them begins.
- 12. Fire watch has been established.

Flammable and Combustible Materials

Regular evaluation concerning the presence of combustible materials at Percheron LLC is a requirement to office managers.

Certain types of substances can ignite at relatively low temperatures or pose a risk of catastrophic explosion if ignited. Such substances obviously require special care and handling.

Class A combustibles.

These include common combustible materials (wood, paper, cloth, rubber, and plastics) that can act as fuel and are found in non-specialized areas, such as offices.

To handle Class A combustibles safely:

- a. Dispose of waste daily.
- b. Keep trash in metal-lined receptacles with tight-fitting covers. Metal wastebaskets that are emptied every day do not need to be covered.
- c. Keep work areas clean and free of fuel paths that could allow a fire to spread.
- d. Keep combustibles away from accidental ignition sources, such as hot plates, soldering irons, or other heat- or spark-producing devices.
- e. Store paper stock in metal cabinets.
- f. Store rags in metal bins with self-closing lids.
- g. Do not order excessive amounts of combustibles.
- h. Frequently inspect areas where combustibles are kept.

Water, multi-purpose dry chemical (ABC), and halon 1211 are approved fire-extinguishing agents for Class A combustibles.

Class B combustibles.

These include flammable and combustible liquids (oils, greases, tars, oil-based paints, and lacquers), flammable gases, and flammable aerosols.

To handle Class B combustibles safely:

- a. Use only approved pumps, taking suction from the top, to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets).
- b. Do not dispense Class B flammable liquids into containers unless the nozzle and container are electrically interconnected by contact or a bonding wire. Either the tank or container must be grounded.
- c. Store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources, such as heating or electric equipment, open flames, or mechanical or electric sparks.
- d. Do not use a flammable liquid as a cleaning agent inside a building. The only exception is in a closed machine approved for cleaning with flammable liquids.
- e. Do not use, handle, or store Class B combustibles near exits, stairs, or other areas normally used as exits.
- f. Do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles.
- g. Do not generate heat, allow an open flame, or smoke near Class B combustibles.
- h. Know the location of and how to use the nearest portable fire extinguisher rated for Class B fire.

Do not use water to extinguish Class B fires caused by flammable liquids. Water can cause burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude the air around the burning liquid. The following fire-extinguishing agents are approved for Class B combustibles: carbon dioxide, multi-purpose dry chemical (ABC), halon 1301, and halon 1211. (NOTE: Halon is an ozone-depleting substance and is no longer being manufactured. Existing systems using halon can be kept in place, but employers must post signs indicating where halon or other agents that pose a serious health hazard are used.)

Smoking

Smoking is prohibited in all Percheron LLC buildings. Certain outdoor areas may also be designated as no smoking areas.

Training

Basic fire prevention training will be provided to all employees at least annually. The HSE Department will maintain documentation of the training, which includes:

- a. review of 29 CFR 1910.38, including how it can be accessed;
- b. this Fire Prevention Plan, including how it can be accessed;
- c. good housekeeping practices;
- d. proper response and notification in the event of a fire;

- e. instruction in the use of portable fire extinguishers, as determined by company policy in the Emergency Action Plan; and
- f. how to recognize potential fire hazards.

Supervisors will train employees about fire hazards associated with the specific materials and processes to which they are exposed and will maintain documentation of the training. Employees will receive this training:

- a. at their initial assignment;
- b. annually; and
- c. when changes in work processes necessitate additional training.

Program Review

Justin Lyon, Managing Partner, Safety and Integrated Services will review this Fire Prevention Plan at least annually for necessary changes.

FLAMMABLE STORAGE

February 26, 2021

Purpose

Proper Storage and use of flammable liquids can significantly reduce the possibility of accidental fires and injury to employees. To minimize risk to life and properly, the requirements of NFPA 30 & 321 and OSHA Standard 1910.106 have been implemented. SDS for flammable liquids are kept in the administrative office, and available online at the Percheron Teams Safety Channel.

Percheron LLC does not utilize or store flammable liquids for any commercial/industrial processes. This policy will be enforced upon the use or storage of flammable liquids for commercial/industrial processes.

Responsibilities

Management: HSE Manager is responsible for the management of the flammable storage program.

- Provide proper storage for flammable liquids i.e. flammable storage cabinets.
- Ensure proper training is provided to employees who work with flammable.
- Ensure containers are properly labeled.
- Provide adequate training in the use and storage of flammable liquids
- Monitor for proper use and storage
- Keep only the minimum amount required on hand
- Ensure MSDS are current for all flammable liquids
- Follow all storage and use requirements
- Report deficiencies in storage and use to supervisors
- Immediately report spills to supervisors

Hazard Control

Engineering Controls

- Properly designed flammable storage areas
- Ventilated Storage areas
- Grounding Straps on Drums and dispensing points

Administrative Controls

- Designated storage areas
- Limiting amount of flammable liquids in use and storage
- Employee Training
- Limited & controlled access to bulk storage areas
- Posted Danger, Warning and Hazard Signs

Definitions

Flammable Liquid - a liquid with a flashpoint below 100°F

- Class IA flashpoint below 73°F and boiling point below 100°F
- Class IB flashpoint below 73°F and boiling point above 100°F
- Class IC flash at or above 73°F and below 100°F

Combustible Liquids - a liquid having a flash point at or above 100⁰ F.

Class II Combustibles - Flashpoint above 100°F and below 140°F

Class III Combustibles - Flashpoint at or above 140°F

- Subclass IIIA flashpoint at or above 140°F and below 200°F
- Subclass IIIB flashpoint at or above 200°F

Substitution

Flammable liquids sometimes may be substituted by relatively safe materials in order to reduce the risk of fires. Any substituted material should be stable and nontoxic and should either be nonflammable or have a high flashpoint.

Storage & Usage of Flammable Liquids

Flammable and combustible liquids require careful handling at all times. The proper storage of flammable liquids within a work area is very important in order to protect personnel from fire and other safety and health hazards.

- Storage of Flammable liquids shall be in NFPA approved flammable storage lockers or in low value structures at least 50 feet from any other structure. Do not store other combustible materials near flammable storage areas or lockers
- Bulk drums of flammable liquids must be grounded and bonded to containers during dispensing
- Portable containers of gasoline or diesel are not to exceed 5 gallons
- Safety cans used for dispensing flammable or combustible liquids shall be kept at a point of use.
- Appropriate fire extinguishers are to be mounted within 75 feet of outside areas containing flammable liquids, and within 10 feet of any inside storage area for such materials.
- Storage rooms for flammable and combustible liquids must have explosion-proof light fixtures
- Bulk storage of gasoline or diesel are kept in above ground tanks. Tank areas are diked to contain accidental spills. Tanks shall be labeled IAW NFPA guidelines. All tank areas shall be designated no smoking no hot work no open flame areas.
- No flames hot-work or smoking is be permitted in flammable or combustible liquid storage areas.
- The maximum amount of flammable liquids that may be stored in a building are
- 20 gallons of Class IA liquids in containers
- 100 gallons of Class IB, IC, II, or III liquids in containers
- 500 gallons of Class IB, IC, II, or III liquids in a single portable tank.
- Flammable liquid transfer areas are to be separated from other operations by distance or by construction having proper fire resistance.
- When not in use flammable liquids shall be kept in covered containers.
- Class I liquids may be used only where there are no open flames or other sources of ignition within the possible path of vapor travel.
- Flammable or combustible liquids shall be drawn from or transferred into vessels, containers, or portable tanks within a building only through a closed piping system, from safety cans, by means of a device drawing through the top, or from a container or portable tanks by gravity through an approved self-closing valve. Transferring by means of air pressure on the container or portable tanks shall be prohibited.

- Maintenance and operating practices shall be in accordance with established procedures which will tend to control leakage and prevent the accidental escape of flammable or combustible liquids. Spills shall be cleaned up promptly.
- Combustible waste material and residues in a building or unit operating area shall be kept to a minimum, stored in covered metal receptacles and disposed of daily.
- Rooms in which flammable or combustible liquids are stored or handled by pumps shall have exit facilities arranged to prevent occupants from being trapped in the event of fire.
- Inside areas in which Class I liquids are stored or handled shall be heated only by means not constituting a source of ignition, such as steam, hot water or forces central systems located away from the area.

Cabinets

Not more than 120 gallons of Class I, Class II, and Class IIIA liquids may be stored in a storage cabinet. Of this total, not more than 60 gallons may be Class I and II liquids.

Not more than three such cabinets (120 gallons each) may be located in a single fire area except in an industrial area.

Containers

The capacity of flammable and combustible liquid containers will be in accordance with the above table.

	Flammable Liquids		Combustible		
Container	1A	1B	1C	II	III
Glass or approved plastic1	1 pt	1 qt	1 gal	1 gal	1 gal
Metal (Other than DOT drums)	1 gal	5 gal	5 gal	5 gal	5 gal
Safety Cans	2 gal	5 gal	5 gal	5 gal	5 gal
Metal drums (DOT specifications)	60 gal	60 gal	60 gal	60 gal	60 gal
Approved portable tanks	660 gal	660 gal	660 gal	660 gal	660 gal

Maximum allowable capacity of containers and portable tanks

(1) Nearest metric size is also acceptable for the glass and plastic $\frac{1}{SEP}$

(2) One gallon or nearest metric equivalent size may be used if metal and labeled with their contents.

Storage Inside Buildings

Where approved storage cabinets or rooms are not provided, inside storage will comply with the following basic conditions:

The storage of any flammable or combustible liquid shall not physically obstruct a means of egress from the building or area.

Containers of flammable or combustible liquids will remain tightly sealed except when transferred, poured or applied. Remove only that portion of liquid in the storage container required to accomplish a particular job.

If a flammable and combustible liquid storage building is used, it will be a one-story building devoted principally to the handling and storing of flammable or combustible liquids. The building will have 2-hour fire-rated exterior walls having no opening within 10 feet of such storage.

Flammable paints, oils, and varnishes in 1 or 5 gallon containers, used for building maintenance purposes, may be stored temporarily in closed containers outside approved storage cabinets or room if kept at the job site for less than 10 calendar days.

Ventilation

Every inside storage room will be provided with a continuous mechanical exhaust ventilation system. To prevent the accumulation of vapors, the location of both the makeup and exhaust air openings will be arranged to provide, as far as practical, air movement directly to the exterior of the building and if ducts are used, they will not be used for any other purpose.

Designated Flammable Storage Areas are:

- 1. Office Buildings meeting all appropriate storage requirements.
- 2. Job Sites meeting all appropriate storage requirements.

FIRE EXTINGUISHER

Applicability

This sample Plan applies to employers that allow employees to fight incipient fires in the workplace under the Occupational Safety and Health Administration (OSHA) portable fire extinguisher rule (29 CFR 1910.157).

- You keep portable fire extinguishers in the workplace but do not want employees fighting fires and therefore evacuate all employees in the fire danger area to safety. OSHA recognizes that portable fire extinguishers may be required in the workplace by other organizations (e. g., insurance companies, local fire departments, etc.) even when employees are not trained to use them. Portable fire extinguishers that are not intended for employee use may still pose a hazard if they are not properly maintained. Employers who select this option must comply only with the maintenance, inspection, and testing requirements of the fire extinguisher rule (29 CFR 1910.157(e) and (f)). A written Emergency Action Plan (29 CFR 1910.38) and Fire Prevention Plan (29 CFR 1910.39) is required for this option (see 29 CFR 1910.157(b)(1)).
- You evacuate all employees from the danger area except those designated to use portable fire extinguishers. Employers who select this option need not comply with the distribution requirements of the fire extinguisher rule (29 CFR 1910.157(d)). This option allows the employer to distribute extinguishers in a manner such that they are available to the employees designated to fight incipient stage fires. The facility's Emergency Action Plan should include the list of employees designated to use portable fire extinguishers.
- Any employee may use a fire extinguisher to fight an incipient fire; evacuation may not be required during the control of an incipient stage fire. Employers who provide portable fire extinguishers for use by any employee to use in fighting incipient stage fires must comply with the fire extinguisher rule (29 CFR 1910.157) in its entirety.

Provide all employee training elements. Employees who provide portable fire extinguishers for employee use must provide an educational program to familiarize all employees with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting. Employees who are expected to use portable fire extinguishers must be provided with "hands on" training in the use of the fire extinguishing equipment. If you choose to comply with the entire portable fire extinguisher rule (29 CFR 1910.157), there is no requirement to comply with the Emergency Action Plan requirements (29 CFR 1910.38).

You may provide educational materials, without classroom instruction, through the use of employee notice campaigns using instruction sheets or flyers or similar types of informal programs; this however, does not relieve you of the responsibility to provide hands-on training for actual fire extinguisher use. You may provide onsite training which exposes employees to the actual "feeling" of firefighting by simulated fires for training employees in the proper use of extinguishers.

Policy Statement

Percheron provides portable fire extinguishers for designated employees who are authorized and trained to extinguish incipient fires. All other employees must evacuate immediately upon the sounding of a fire alarm or when instructed by authorized personnel.
Authority and Scope

Authority: 29 CFR 1910.157 (Portable Fire Extinguishers) NFPA

Scope: This Plan covers the placement, use, maintenance, and testing of portable fire extinguishers to extinguish incipient fires at the workplace.

Plan Administration

Table 1F provides the personnel and contact information for the administration of the fire extinguisher plan.

Table 1F—Program Contact Information

Function	Name/Department	Contact Information
Managing Partner, Safety	Justin Lyon	Cell phone: 979-578-6383
Managing Director	Various (refer to your specific EAP)	Cell phone:

Safety and Health Program Administrator. The Administrator will:

- Develop and revise, when necessary, the Portable Fire Extinguisher Plan
- Provide relevant training to personnel who are authorized to use fire extinguishers.
- Develop and implement a fire extinguisher maintenance and update schedule
- Take corrective action when needed

Managing Director

The Managing Director will:

• Ensure that only authorized employees use fire extinguishers

Plan Review and Update

The Plan will be reviewed annually. It will be revised when:

- New fire hazards are introduced to the workplace
- The regulations change
- Operations at the facility change that affect accessibility and use of fire extinguishers
- Near misses or accidents demonstrate a failure of the Plan

Definitions

Incipient fire—a fire in its beginning stage that can be controlled or extinguished with a portable fire extinguisher without the need for protective clothing or breathing apparatus.

Portable fire extinguisher—a manually operated, pressurized container that contains an agent that when discharged can extinguish an incipient fire.

Portable Fire Extinguisher Use

Portable fire extinguishers are provided for use by designated employees as authorized and trained to use them to fight incipient fires. All other employees must evacuate their location immediately upon the sounding of a fire alarm or when instructed by authorized personnel.

A list of employees trained and authorized to use portable fire extinguishers will be maintained.

Selection, Types and Locations of Portable Fire Extinguishers

Selection - Portable fire extinguishers have been selected and distributed at the location by HSE Department on the basis of the types of anticipated workplace fires and on the size and degree of hazard that would affect their use.

A *Fire Extinguisher Inventory Log* will be maintained with information on portable fire extinguisher distributed in the facility, its type, and location.

Types and Ratings - This facility maintains [Underwriters Laboratories (UL), or Factory Mutual Laboratories (FM)]-approved extinguishers for the following types of potential fires:

[Modify the list as applicable to your facility.]

- Type A—ordinary combustibles such as wood, cloth, paper, rubber and many plastics
- [Insert or delete the following as applicable: This facility uses standpipe systems/hose stations connected to a sprinkler system installed for emergency use by employees instead of Class A portable fire extinguishers. Employees are trained at least annually in their use.]
- Type B—flammable liquids, such as gasoline, oil, grease, tar, solvents, oil-based paint, lacquer, and flammable gas
- Type C—energized electrical equipment, including wiring, fuse boxes, circuit breakers, machinery and appliances
- Type D—combustible metals such as magnesium, titanium, sodium, and potassium (uncommon)
- Type K—kitchen fires involving combustible cooking fluids such as oils and fats

Locations - Portable fire extinguishers are located in or in close proximity to all fire hazard areas. Following is the maximum employee travel distance to any extinguisher in the facility:

- Class A–75 feet from a hazard area
- Class B–50 feet from a hazard area
- Class C–Applicable Type A or B distance
- Class D–75 feet from the combustible metalworking area
- Class K–30 feet from a hazard area

Each Percheron owned vehicle will be equipped with a fire extinguisher.

Fire Extinguisher Operating Procedures

Authorized and trained employees will implement the pull-aim-squeeze-sweep (PASS) system for extinguishing incipient fires. Each employee will determine whether he or she is capable of fighting a fire on a case-by-case basis.

Following are the basic required conditions under which an employee may fight an incipient fire:

- The fire is small and at its beginning stage
- Heavy smoke is not present
- An appropriate fire extinguisher is readily available
- There is an unblocked exit immediately available for evacuation

If an employee is authorized and trained to extinguish incipient fires, he or she should access the nearest appropriate extinguisher(s), move to a position upwind of the fire if the air is moving, and operate the extinguisher following the PASS procedure:

- 1. P—Pull the pin located in the extinguisher's handle.
- 2. A—Aim the nozzle at the base of the fire.
- 3. S—Squeeze the lever or handle.
- 4. S—Sweep from side to side at the base of the fire until the fire is out or the canister is empty.

Safety Precautions

Employees will evaluate the risks of fighting an incipient fire before attempting to extinguish it.

Escape if the fire grows. If employees elect to put out a fire and it grows too large to control, they will immediately escape through the nearest exit, and close—but NEVER LOCK—the door behind them if possible. Employees must evacuate immediately if the extinguisher is empty and the fire is not out or if the fire progresses beyond the incipient stage.

Keep away from hazardous substances. When hazardous substances are involved, smoke and gases released from a fire can be toxic, so employees should never attempt to put out a fire if they have any doubts about their own safety and health. If they have any doubts, employees will evacuate the area and wait for emergency responders who have the proper equipment and are trained in fire-fighting procedures.

Inspection, Maintenance, and Testing

All portable fire extinguishers will be maintained in a fully charged and operable condition and kept in their designated places at all times except during use.

Inspection and Maintenance - Assigned Employees will visually inspect all portable fire extinguishers monthly according to the following guidelines:

- Extinguishers must be located in their designated location, secured properly and the proper type for the hazard area.
- Access to extinguishers is not obstructed.
- Extinguishers are examined for obvious physical damage, corrosion, leakage, or clogged nozzles.
- Legible operating instructions are on the extinguisher nameplate facing outward.
- Seals and tamper indicators are not broken or missing.

- Pressure-gauge readings or indicators are in the operable ranges.
- Inspection tags must be initialed and dated.

Vendor/Property Manager will conduct a maintenance check at least annually according to the following guidelines:

- Ensure all monthly inspection checks were conducted.
- Inspect the hose and nozzle for cracks, blockages, or other damage.
- Inspect the extinguisher shell for corrosion, dents, or other damage.
- Weigh carbon dioxide extinguishers to ensure no weight deviation greater than 10%.

Corrective Actions

Defective extinguishers will be removed, marked or tagged with information about the defect, and placed in a designated location until repair and/or recharging is performed.

The inspector will provide a replacement extinguisher when portable fire extinguishers are removed from service for maintenance and recharging.

Recordkeeping

The HSE Department and Managing Director will retain a record of the annual inspection and maintenance date for each extinguisher for at least one year after the last entry or the life of the extinguisher shell, whichever is less.

A *Portable Fire Extinguisher Inspection and Maintenance Record* form and maintenance records will be kept.

Records of inspections and maintenance procedures performed under contract by outside vendors must be submitted to the HSE Department at the end of each contract year or at the projects end.

Hydrostatic Testing

All portable fire extinguishers will be hydrostatically tested at regular intervals and whenever they show evidence of corrosion or mechanical damage.

A copy of the *Certified Hydrostatic Test Schedule and Log* form will be maintained.

Managing Director will ensure that portable extinguishers are hydrostatically tested at the intervals listed in Attachment 163D except when:

- The unit has been repaired by soldering, welding, brazing, or use of patching compounds
- The cylinder or shell threads are damaged
- There is corrosion that has caused pitting, including corrosion under removable name plate assemblies
- The extinguisher has been burned in a fire
- A calcium chloride extinguishing agent has been used in a stainless steel shell

Extinguishers subject to the exceptions described above will be tested or replaced immediately upon discovery of damage.

An internal examination of cylinders and shells will be made prior to the hydrostatic tests.

The employer will ensure that stored pressure dry chemical extinguishers that require a 12-year hydrostatic test are emptied and subjected to applicable maintenance procedures every 6 years. Dry chemical extinguishers with non-refillable disposable containers are exempt from this requirement. When recharging or hydrostatic testing is performed, the 6-year requirement begins from that date.

Extinguisher hose assemblies. Hydrostatic tests will be performed on extinguisher hose assemblies which are equipped with a shut-off nozzle at the discharge end of the hose. The test interval will be the same as specified for the extinguisher on which the hose is installed.

Recordkeeping

HSE Department will retain a certified record of hydrostatic testing for each portable extinguisher owned by Percheron according to the time intervals listed in Attachment 163C & 163D. Each record will include the date of the test, the signature of the person who performed the test, and the serial number, or other identifier, of the fire extinguisher that was tested. Such records will be kept until the extinguisher is hydrostatically retested at the specified time interval, or until the extinguisher is taken out of service, whichever comes first.

Training

The HSE Department will provide employees authorized to use portable fire extinguishers with an educational program upon initial employment and annually thereafter to familiarize them with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting.

Employees who have been designated to use firefighting equipment as part of an emergency action plan will be trained in the use of the appropriate equipment.

SUBPART I – WALKING-WORKING SURFACES

LADDERS

April 12, 2019

Always use an approved ladder to reach any item above your extended arm height. Never use a makeshift device, such as a desktop, file cabinet, chair, bookshelf, or box as a substitute for a ladder. This section applies to general office safety only.

Follow these guidelines when using ladders:

- Do not load a ladder above its intended weight capacity.
- Place ladders on a slip-free surface even if they have slip-resistant feet.
- Secure the ladder if a slip-free surface is not available.
- Avoid placing ladders in walkways.
- Secure a ladder if its location could cause an accident.
- Keep areas around ladders clean and free of debris.
- Do not use a ladder in front of a door unless the door is locked and barricaded.
- Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use.
- Do not stand on the top two rungs of a step ladder.
- Always face the ladder when ascending or descending.
- Do not carry objects that could cause injury in the event of a fall.
- Ladders shall be used only for the purpose for which they were designed.
- Never use ladder in a horizontal position or as scaffolding, do not place ladders on top of boxes, barrels, crates, etc.
- Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.
- Portable and fixed 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 "D" Not Use" "r similar language, and shall be withdrawn from service until repaired.
- The ladder side rails shall extend at least 3 feet (.9m) above the upper landing 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 be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately 4 to 1 angle ratio. (The distance along the ladder between the foot and the top support.)
- Employees may only use Ladders that meet OSHA/ANSI specifications.

SLIPS, TRIPS AND FALLS

The easiest ways to avoid slips and falls is to pay attention to your surroundings and to avoid running or rushing. To ensure safety for others in the office, however, follow these guidelines:

- Arrange office furnishings in a manner that provides unobstructed areas for movement.
- Keep stairs, steps, flooring, and carpeting well maintained.
- Ensure that glass doors have some type of marking to keep people from walking through them.
- Clearly mark any difference in floor level that could cause a trip or fall.
- Secure throw rugs and mats to prevent slipping hazards.
- Clean-up fluid spills.
- Do not place wastebaskets or other objects in walkway.
- Be aware of added risk of falling when entering a building if outside weather is rain or snow.

STAIRWAYS

March 23, 2021

This policy covers all stairways (including standard, spiral, ship, and alternating tread-type stairs), except for stairs serving floating roof tanks, stairs on scaffolds, stairs designed into machines or equipment, and stairs on self-propelled motorized equipment.

When applicable Percheron will ensure:

Handrails, stair rail systems, and guardrail systems are provided in accordance with § 1910.28;

Vertical clearance above any stair tread to any overhead obstruction is at least 6 feet, 8 inches (203 cm), as measured from the leading edge of the tread. Spiral stairs must meet the vertical clearance requirements in this policy.

Stairs have uniform riser heights and tread depths between landings;

Stairway landings and platforms are at least the width of the stair and at least 30 inches (76 cm) in depth, as measured in the direction of travel;

When a door or a gate opens directly on a stairway, a platform is provided, and the swing of the door or gate does not reduce the platform's effective usable depth to:

Less than 20 inches (51 cm) for platforms installed before January 17, 2017; and

Less than 22 inches (56 cm) for platforms installed on or after January 17, 2017 (see Figure D-7 of this section);

Each stair can support at least five times the normal anticipated live load, but never less than a concentrated load of 1,000 pounds (454 kg) applied at any point;

Standard stairs are used to provide access from one walking-working surface to another when operations necessitate regular and routine travel between levels, including access to operating platforms for equipment. Winding stairways may be used on tanks and similar round structures when the diameter of the tank or structure is at least 5 feet (1.5 m).

Spiral, ship, or alternating tread-type stairs are used only when the employer can demonstrate that it is not feasible to provide standard stairs.

When applicable all spiral, ship, or alternating tread-type stairs, are installed, used, and maintained in accordance with manufacturer's instructions.



Figure D-7 -- Door or Gate Opening on Stairway.

In addition to previous requirements, Percheron will ensure standard stairs:

Are installed at angles between 30 to 50 degrees from the horizontal;

Have a maximum riser height of 9.5 inches (24 cm);

Have a minimum tread depth of 9.5 inches (24 cm); and

Have a minimum width of 22 inches (56 cm) between vertical barriers (see Figure D-8 of this section).

The requirements do not apply to standard stairs installed prior to January 17, 2017. OSHA will deem those stairs in compliance if they meet the dimension requirements specified in Table D-1 of this section or they use a combination that achieves the angle requirements of this policy.

Table D-1 -- Stairway Rise and Tread Dimensions

Angle to horizontal	Rise (in inches)	Tread run (in inches)
30 deg. 35'	6 1/2	11
32 deg. 08'	6 3/4	10 3/4
33 deg. 41'	7	10 1/2
35 deg. 16'	7 1/4	10 1/4
36 deg. 52'	7 1/2	10
38 deg. 29'	7 3/4	9 3/4
40 deg. 08'	8	9 1/2
41 deg. 44'	8 1/4	9 1/4
43 deg. 22'	8 1/2	9
45 deg. 00'	8 3/4	8 3/4
46 deg. 38'	9	8 1/2
48 deg. 16'	9 1/4	8 1/4
49 deg. 54'	9 1/2	8



Minimum tread width 22 IN (56 CM), Minimum Tread Depth 9.5 IN (24 CM), Maximum Riser Height 9.5 IN (24 CM).

When equipped in Percheron worksites. Percheron will ensure spiral stairs:

Have a minimum clear width of 26 inches (66 cm);

Have a maximum riser height of 9.5 inches (24 cm);

- Have a minimum headroom above spiral stair treads of at least 6 feet, 6 inches (2 m), measured from the leading edge of the tread;
- Have a minimum tread depth of 7.5 inches (19 cm), measured at a point 12 inches (30 cm) from the narrower edge;

Have a uniform tread size;

When applicable Percheron will ensure ship stairs (see Figure D-9 of this section):

Are installed at a slope of 50 to 70 degrees from the horizontal;

Have open risers with a vertical rise between tread surfaces of 6.5 to 12 inches (17 to 30 cm);

Have minimum tread depth of 4 inches (10 cm); and

Have a minimum tread width of 18 inches (46 cm).



Figure D-9 -- Ship Stairs.

Percheron will ensure in all offices or worksites that any alternating tread-type stairs:

Have a series of treads installed at a slope of 50 to 70 degrees from the horizontal;

Have a distance between handrails of 17 to 24 inches (51 to 61 cm);

Have a minimum tread depth of 8.5 inches (22 cm); and

Have open risers if the tread depth is less than 9.5 inches (24 cm);

Have a minimum tread width of 7 inches (18 cm), measured at the leading edge of the tread (*i.e.*, nosing).

SUBPART J – HAND AND PORTABLE POWER TOOLS AND OTHER HANDHELD EQUIPMENT

HAND AND PORTABLE POWER TOOLS

March 20, 2023

To establish guidelines for the safe use of hand and power tools. All hand and power tools, whether furnished by the employer or the employee, shall be maintained in a safe condition. Supervisors will periodically inspect hand tools in their work area and Employees are responsible for ensuring tools are maintained in a reliable and safe condition, properly stored, and that proper PPE is used. In addition, follow these guidelines to ensure hand and power tool safety:

- Small tools shall be kept in an orderly fashion.
- Crowbars, chain tongs, pipe cutters, and similar tools shall be placed in racks.
- All tools and equipment shall be inspected before use. Defective and unsafe tools or equipment shall be tagged, set aside and promptly reported to the supervisor.
- Chisels, sledgehammers, and other impact tools shall be kept free of mushrooming by filing/grinding.
- Hand or power tools shall be used only in the manner for the work for which they were designed.
- The handle of all sledges, hammers, mauls, axes, picks, and similar tools shall be securely wedged into the head.
- Files shall not be used without handles.
- Wooden handles shall not be painted. Cracked or split handles shall not be taped. Cracked or split handles shall be replaced.
- Use Proper PPE such as safety glasses, hearing protection, respiratory masks, gloves or other types of equipment necessary.
- Any tool which is not in compliance with any applicable requirement of this part is prohibited and shall be identified as unsafe by tagging or locking the controls to render them inoperable.
- Extensions, or "cheaters" shall not be used until efforts to break the connection with the largest wrench available have failed.
- If a cheater must be used, place it on the largest wrench available.
- Never use a cheater on a "crescent-type" wrench.
- Extension shall not be longer than 1 1/2 times the handle length.
- Guards must always be in place and they shall not be modified.
- Electric tools showing worn, deteriorated or inadequate insulation, etc. shall be tagged "DO NOT USE" and remove from service.
- Persons using air-operated tools shall make certain the air supply pressure cannot exceed the working pressure of the tool.
- All electric tools shall be grounded by means of a third wire or be a U/L listed double insulated tool.
- Electric tools shall not be used on tanks, lines, etc., unless the tanks or lines are gas free.
- Where there is danger of explosion or fire, only air-operated power tools shall be used.
- Safety washers shall be used on all abrasive wheels.
- Non-portable abrasive wheels shall have a protective shield and a tool rest adjusted to maintain a clearance no greater than 1/8" When operating a non-portable grinder, the operator shall wear

goggles or safety shield and stand to one side of the plane of rotation.

- Grinding wheels shall not be mounted on a grinder whose spindle speed is greater than the wheels rated speed (RPM).
- The connections shall be pinned, or a lanyard used on air hoses with "Chicago" type fittings.
- Compressed air shall not be used to blow dust off clothing. When compressed air is to be used for cleaning purposed, it must be less than 30psi and safety glasses and a face shield must be used.
- Hand and power tools selected and used shall fit the job being performed, fit the workspace available, reduce the force that is needed to be applied, fit the employees' hand and able to be used in a comfortable work position.
- Employees shall complete a Site HSE and Quality Hazard Inspection Form (Appendix II Commonly used forms) to identify the hazards associated with body positioning, ergonomics, repetitive motion hazards, personal lifting techniques, line of fire, fatigue, material handling, working surfaces and soft tissue injuries.
- Affected Percheron employees shall be trained on the general principles of ergonomics while using hand and power tools.

SUBPART K – WORKSITE SAFETY

BEHAVIOR BASED SAFETY OBSERVATION

February 15, 2020

In an effort to ensure that all Percheron employees are working in a safe manner and in compliance with the Percheron Safety Program, behavior-based observations will be conducted. All Percheron Executives, Directors, Managers, and Supervisors are authorized to conduct behavior-based observations. These observations should provide direct, measurable information on employees' work practices identifying both safe and unsafe behaviors. Unsafe behaviors should be addressed immediately. Positive reinforcement of safe behavior is encouraged at all levels. All Percheron employees should be aware they are subject to being observed at any time during their assigned tasks.

Percheron Management and Supervisors may be required to complete Behavior Based Safety Observation training. This training will include the following topics: program objectives and incident metrics reviewed, how to conduct the observation, how to complete the observation form, what do the behaviors mean, feedback training and role play (mentoring and coaching) and informing employees to be aware they may be observed at any time.

Upon completion of an observation, the Manager or Supervisor conducting the observation is expected to have a discussion with the observed employee to give and receive feedback. The following key elements should be part of every behavioral based safety discussion:

- 1. Review the observation with observed employee
- 2. Start every discussion with a positive comment(s)
- 3. Reinforce safe behaviors observed first
- 4. Describe and discuss unsafe behaviors observed
- 5. Solicit from observed employee explanation of his/her unsafe behavior with open-ended questions
- 6. Re-emphasize no consequence to observed employee

All departments within Percheron and all field locations should conduct behavioral-based observations and the subsequent discussions. The results of these observations should be utilized within the department to address any unsafe behaviors, as well as compiled with other departments and business units to evaluate the company as a whole. Analysis of this data and identification of trends will be used to develop appropriate actions to address the unsafe behavior.

Action planning will include:

- 1. Evaluate unsafe behaviors from trend analysis and prioritize
- 2. Develop action plan for unsafe behaviors based on comments and feedback from data sheets
- 3. Designate responsible parties and timeframes within the action plan
- 4. Define who is responsible for action planning
- 5. Ensure management support

OFFICE SAFETY

Introduction

A large percentage of workplace accidents and injuries occur in office buildings. The office requires preventive measures to ensure a safe and healthful environment. Common causes of office accidents include the following:

- Slipping, tripping, and falling hazards
- Burning, cutting, and pinching hazards
- Improper lifting and handling techniques
- Unobservant and inattentive employees
- Improper office layout and arrangement
- Dangerous electrical wiring
- Exposure to toxic substances

The following sections address several office safety practices.

REMEMBER: The office building is not a sterile working environment; common workplace hazards can be extra dangerous when you ignore them.

Refer to other chapters in this manual, such as Electrical Safety, General Safety, Fire Safety, and others for more information on workplace safety. Always use common sense. Safety is always a concern.

Good Housekeeping Practices

Many office accidents are caused by poor housekeeping practices. By keeping the office floor both neat and clean, you can eliminate most slipping, tripping, and falling hazards. Other good housekeeping practices include the following:

- Ensure that office lighting is adequate and available. Request replacement of burned out light bulbs, and have additional lighting installed, as necessary.
- Ensure that electrical cords and phone cords do not cross walkways or otherwise pose a tripping hazard. If you cannot move a cord, have a new outlet installed or secure the cord to the floor with cord covering strips. Do not tape cords down or run them underneath carpet.
- Report or repair tripping hazards such as defective tiles, boards, or carpet immediately.
- Clean spills and pick up fallen debris immediately. Even a loose pencil could cause a serious falling injury.
- Keep office equipment, facilities, and machines in good condition.
- Store items in an approved storage space. Take care to not stack boxes too high or too tight. Ensure that boxes are clearly labeled with their contents.

Hazardous Objects and Materials

Unauthorized hazardous objects such as knives and firearms are not permitted in the workplace. In addition, hazardous chemicals and materials should not be stored in the general office. Hazardous materials include but are not limited to, the following:

- Carcinogens
- Combustibles
- Flammables
- Gas cylinders
- Irritants
- Oxidizers
- Reactive

Preventing Cuts and Punctures

Cuts and punctures happen when people use everyday office supplies without exercising care. Follow these guidelines to help reduce the chance for cuts and punctures:

- When sealing envelopes, use a liquid dispenser, not your tongue.
- Be careful when using kitchen knives, scissors, staplers, letter openers, and box openers. Any of these items could cause a painful injury and should only be used for their intended purpose.
- Avoid picking up broken glass with your bare hands. Wear gloves and use a broom and a dustpan.
- Place used blades or broken glass in a rigid container, such as a box, before disposing in a wastebasket.

Preventing Machine Accidents

Only use machines that you know how to operate. Never attempt to operate an unfamiliar machine without reading the machine instructions or receiving directions from a qualified employee. In addition, follow these guidelines to ensure machine safety:

- Secure machines that tend to move during operation.
- Do not place machines near the edge of a table or desk.
- Ensure that machines with moving parts are guarded to prevent accidents. Do not remove these guards. Defective guards should be replaced.
- Unplug defective machines and have them repaired immediately.
- Do not use any machine that smokes, sparks, shocks, or appears defective in any way.
- Close hand-operated paper cutters after each use and activate the guard.

Take care when working with copy machines. If you have to open the machine for maintenance, repair, or troubleshooting, remember that some parts may be hot. Always follow the manufacturer's instructions for troubleshooting.

Unplug paper shredders before conducting maintenance, repair, or troubleshooting. Secure any loose clothing or long hair before using a paper shredder.

Some items can be very dangerous when worn around machinery with moving parts. Avoid wearing the following items around machines with moving parts:

- Loose belts
- Jewelry
- Long, loose hair
- Long, loose sleeves or pants

- Scarves
- Ties

Working with Hand and Power Tools

To establish guidelines for the safe use of hand and power tools. All hand and power tools, whether furnished by the employer or the employee, shall be maintained in a safe condition. Supervisors will periodically inspect hand tools in their work area and Employees are responsible for ensuring tools are maintained in a reliable and safe condition, properly stored, and that proper PPE is used. In addition, follow these guidelines to ensure hand and power tool safety:

- Small tools shall be kept in an orderly fashion.
- Crowbars, chain tongs, pipe cutters, and similar tools shall be placed in racks.
- All tools and equipment shall be inspected before use. Defective and unsafe tools or equipment shall be tagged, set aside and promptly reported to the supervisor.
- Chisels, sledge hammers, and other impact tools shall be kept free of mushrooming by filing/grinding.
- Hand or power tools shall be used only in the manner for the work for which they were designed.
- The handle of all sledges, hammers, mauls, axes, picks, and similar tools shall be securely wedged into the head.
- Files shall not be used without handles.
- Wooden handles shall not be painted. Cracked or split handles shall not be taped. Cracked or split handles shall be replaced.
- Use Proper PPE such as safety glasses, hearing protection, respiratory masks, gloves or other types of equipment necessary.
- Any tool which is not in compliance with any applicable requirement of this part is prohibited and shall be identified as unsafe by tagging or locking the controls to render them inoperable.
- Extensions, or "cheaters" shall not be used until efforts to break the connection with the largest wrench available have failed.
- If a cheater must be used, place it on the largest wrench available.
- Never use a cheater on a "crescent-type" wrench.
- Extension shall not be longer than 1 1/2 times the handle length.
- Guards must always be in place and they shall not be modified.
- Electric tools showing worn, deteriorated or inadequate insulation, etc. shall be tagged "DO NOT USE" and remove from service.
- Persons using air-operated tools shall make certain the air supply pressure cannot exceed the working pressure of the tool.
- All electric tools shall be grounded by means of a third wire or be a U/L listed double insulated tool.
- Electric tools shall not be used on tanks, lines, etc., unless the tanks or lines are gas free.
- Where there is danger of explosion or fire, only air-operated power tools shall be used.
- Safety washers shall be used on all abrasive wheels.
- Non-portable abrasive wheels shall have a protective shield and a tool rest adjusted to maintain a clearance no greater than 1/8" When operating a non-portable grinder, the operator shall wear goggles or safety shield and stand to one side of the plane of rotation.
- Grinding wheels shall not be mounted on a grinder whose spindle speed is greater than the wheels rated speed (RPM).
- The connections shall be pinned, or a lanyard used on air hoses with "Chicago" type fittings.

• Compressed air shall not be used to blow dust off clothing. When compressed air is to be used for cleaning purposed, it must be less than 30psi and safety glasses and a face shield must be used.

Preventing Slips and Falls

The easiest ways to avoid slips and falls is to pay attention to your surroundings and to avoid running or rushing. To ensure safety for others in the office, however, follow these guidelines:

- Arrange office furnishings in a manner that provides unobstructed areas for movement.
- Keep stairs, steps, flooring, and carpeting well maintained.
- Ensure that glass doors have some type of marking to keep people from walking through them.
- Clearly mark any difference in floor level that could cause a trip or fall.
- Secure throw rugs and mats to prevent slipping hazards.
- Clean-up fluid spills.
- Do not place wastebaskets or other objects in walkway.
- Be aware of added risk of falling when entering a building if outside weather is rain or snow.

Preventing Stress

To reduce stress and prevent fatigue, it is important to take mini-breaks throughout the day. If possible, change tasks at least once every two hours. Stretch your arms, neck and legs often if you do the same type of work for long periods of time. Rest your eyes by closing them or looking at something other than the work at hand. For a quick pick-me-up, breathe deeply several times by inhaling through your nose and exhaling through your mouth. In addition, always try to eat your lunch somewhere other than your desk.

Other examples of stress-relieving exercises that can be done at your desk include the following:

- **Head and Neck Stretch**: Slowly turn your head to the left and hold it for three seconds. Slowly turn your head to the right and hold it for three seconds. Drop your chin gently towards your chest and then tilt it back as far as you can. Repeat these steps five to ten times.
- **Shoulder Roll**: Roll your shoulders forward and then backward using a circular motion.
- **Upper Back Strength**: Grasp one arm below the elbow and pull gently towards the other shoulder. Hold this position for five seconds and then repeat with the other arm.
- Wrist Wave: With your arms extended in front of you, raise and lower your hands several times.
- **Finger Stretch**: Make fists with your hands and hold tight for one second, then spread your fingers wide for five seconds.

Equipment Safety: As mentioned earlier, common office machines, such as the following require special safety consideration:

• Copiers, microwaves, adding machines, paper shredders, paper cutters, typewriters and computers.

Be sure you know how to operate these machines before using them, and never use one of these machines if you think it is defective.

File Cabinets and Shelves

Because file cabinets and shelves tend to support heavy loads, treat them with special care. Follow these safety guidelines for file cabinets:

- Secure file cabinets that are not weighted at the bottom. Either bolt them to the floor or to the wall.
- Ensure that file cabinet drawers cannot easily be pulled clear of the cabinet.
- Do not block ventilation grates with file cabinets.
- Open only one drawer at a time to keep the cabinet from toppling.
- Close drawers when they are not in use.
- Load the bottom drawers prior to loading higher drawers to keep the cabinet from tipping over.
- Do not place heavy objects on top of cabinets. Be aware that anything on top of a cabinet may fall off if a drawer is opened suddenly.
- Close drawer slowly using the handle to avoid pinched fingers.
- Keep the bottom drawer full. This will help stabilize the entire cabinet.
- In addition, follow these safety guidelines for office shelves:
- Place heavy objects on the bottom shelves. This will keep the entire structure more stable.
- Ensure that there is at least 18 inches between the top shelf items and the ceiling. This space will allow ceiling sprinklers (if present) to function properly if a fire occurs.
- Do not block ventilation grates with shelves.
- Never climb on shelves (even lower shelves). Use an approved ladder to work at heights.

Desks

Follow these safety guidelines for office desks:

- Keep desks in good condition (i.e., free from sharp edges, nails, etc.)
- Ensure that desks do not block exits or passageways.
- Ensure that desks with spring loaded tables function properly. The table should not spring forth with enough force to cause an injury.
- Do not climb on desks. Use an approved ladder to work at heights.
- Keep desk drawer closed when not in use.
- Repair or report any desk damage that could be hazardous.

Chairs

Safety guidelines for office chairs include the following:

- Do not lean back in office chairs, particularly swivel chairs with rollers.
- Do not climb on any office chair. Use an approved ladder to work at heights.
- Office desk chairs should have adjustable back supports and seat heights. Make sure that your chair's back support position and seat height are comfortable.
- Take care when sitting in a chair with rollers. Make sure it does not roll out from under you when you sit down.
- Repair or report any chair damage that could be hazardous.
- Do not roll chairs over electrical cords.

Ladders

Always use an approved ladder to reach any item above your extended arm height. Never use a makeshift device, such as a desktop, file cabinet, chair, bookshelf, or box as a substitute for a ladder. This section applies to general office safety only.

Follow these guidelines when using ladders:

- Do not load a ladder above its intended weight capacity.
- Place ladders on a slip-free surface even if they have slip-resistant feet.
- Secure the ladder if a slip-free surface is not available.
- Avoid placing ladders in walkways.
- Secure a ladder if its location could cause an accident.
- Keep areas around ladders clean and free of debris.
- Do not use a ladder in front of a door unless the door is locked and barricaded.
- Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use.
- Do not stand on the top two rungs of a step ladder.
- Always face the ladder when ascending or descending.
- Do not carry objects that could cause injury in the event of a fall.
- Ladders shall be used only for the purpose for which they were designed.
- Never use ladder in a horizontal position or as scaffolding, do not place ladders on top of boxes, barrels, crates, etc.
- Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.
- Portable and fixed 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 "D" Not Use" "r similar language, and shall be withdrawn from service until repaired.
- The ladder side rails shall extend at least 3 feet (.9m) above the upper landing 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 be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately 4 to 1 angle ratio. (The distance along the ladder between the foot and the top support.)
- Employees may only use Ladders that meet OSHA/ANSI specifications.

Workstation Arrangement

With the extensive use of computers and other automated desktop devices in the workplace, employees must take special care to ensure proper workstation arrangement. For the purpose of this manual, a workstation consists of the equipment and furniture associated with a typical desk job (i.e., desk, chair, and computer components).

Improper workstation arrangement combined with repetitive motion, however, may contribute to visual and musculoskeletal fatigue.

Cumulative trauma disorders, such as carpal tunnel syndrome may result from the stress of repetitive motion. Therefore, it is very important to arrange your workstation properly and to take breaks frequently.

The following sections offer recommendations for ensuring employee comfort through proper workstation arrangement:

Operator's Position

Your seating position at work is important to your comfort and safety. To reduce the painful effects of repetitive motion, following these guidelines when working with computers or typewriters:

- Always sit up straight. Make sure your chair is adjusted to provide adequate support to your back.
- Place your feet flat on the floor or on a footrest. Lower legs should be approximately vertical, and thighs should be approximately horizontal. The majority of your weight should be on the buttocks.
- Ensure that there is at least one inch of clearance between the top of your thighs and the bottom of the desk or table.
- Keep your wrists in a natural position. They should not rest on the edge of the desk.
- Keep the front edge of your chair approximately four inches behind your knees.

Equipment Arrangement

By properly arranging your equipment, you can also help reduce the harmful effects of repetitive motion. Follow these guidelines for arranging office equipment:

Lighting

Lighting around computer workstations should illuminate the work area without causing glare. Position computer screens, draperies, blinds, and pictures to reduce glare during work hours.

Computer Screen Monitors

Computer Screen Monitor (CSM) images should be clear and well-defined. Adjust the screen's brightness, contrast and display size to meet your needs. If a screen flickers or jumps, have it repaired or replaced. Place the CSM 20-28 inches away from your face. The center of the CSM should be approximately 15 to 25 degrees below your lines of vision.

Keyboards

Position computer keyboards so that the angle between the forearm and upper arm is between 80 and 120 degrees. Place the keyboard in an area that is accessible and comfortable.

Wrist Support

Use wrist supports made of a padded material. This support should allow you to type without bending your wrists.

Document Holders

Keep documents at approximately the same height and distance from your face as the CSM screen.

Telephones

Neck tension is a common problem caused by holding the telephone between the head, neck and shoulders. Use a headset or speakerphone if you use the telephone for extended periods of time.

Lifting

All employees must use proper lifting techniques to avoid injury when lifting objects, especially heavy objects. In general, employees should seek assistance when lifting objects heavier than 50 pounds or more. Use of good judgment by the Percheron employee is required. The employee should first conduct a hazard assessment to consider the size, bulk, weight and distance the object must be carried. Then determine if assistance is required. A dolly or other tools are available to safely lift objects when necessary. If lifting equipment is not available, a minimum of two people are required to perform a lifting operation.

The back supports the weight of the upper body. When an object is lifted or heavy loads are moved, the back has to support the additional weight. If the natural limits are exceeded, injury will occur. Using the muscles in your arms and legs and exercising proper lifting techniques can safely move loads while protecting the back form a very painful injury.

Follow these guidelines to prevent back injuries:

- Avoid moving objects manually. Plan jobs and arrange work areas so that lifting heavy objects can be done mechanically.
- Keep in good physical condition.
- Think before you act. Use proper lifting techniques or lifting aids. Get help when required.

The following steps are required to correctly perform proper lifting technique:

- Test the object's weight before handling. If the object seems too heavy or bulky to lift, get help.
- If the object can be safely lifted, face the object; place one foot behind the object and one foot along its side.
- Bend at the knees, do not bend over.
- Get a firm, balanced grip on the object. Use the palms of your hands or gloves if required.
- Keep the object as close to the body as reasonable (i.e., pull the load in close before lifting).
- Lift by straightening your legs while keeping your back as straight as possible. Again, if the object is too heavy, get assistance. When lifting the object, do not twist the back or bend sideways. Also, do not perform awkward lifts.
- When moving objects, proceed with caution. Progress slowly through narrow passages, through doors and around corners.

Affected Percheron employees shall be trained on the general principles of ergonomics, the hazards of improper lifting and proper lifting techniques.

As part of the Percheron Behavior Based Safety Observation (BBSO) program, supervisors will periodically monitor company employees for improper manual lifting techniques and provide positive correction to prevent injuries. Employees must have accessible and are required to use dolly's and other suitable devices to prevent the hazards caused by manual lifting.

Management shall evaluate employee work conditions, techniques and procedures to assess the risk and to prevent injuries in the design phase of the work

An incident investigation and root causes analyses will be performed when any employee sustains injuries related to manual lifting. The findings of the investigation and corrective actions will be incorporated into safe work processes to prevent future injuries.

LOCK-OUT/TAG-OUT AWARENESS

January 27, 2020

The purpose of this program is to provide awareness of the minimum safety requirements that are to be followed due to unexpected energization, startup or release of stored energy from equipment or machinery that could cause injury to personnel or property damage. This policy is only intended to protect employees who might be working on or around equipment or machinery when it is being maintained, operated or repaired or serviced.

Definitions

<u>Authorized Employee</u>: A knowledgeable and trained individual that has authority and responsibility to perform a specific assignment that has been given by the employer. The authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the methods or means to control the energy.

<u>Affected Employee</u>: A person whose job requires that they operate, use a machine or equipment or work in an area on which maintenance or service is being performed under lock-out.

<u>Energy Isolating Device</u>: A physical device that prevents the transmission or release of energy, including but not limited to; circuit breakers, disconnect switches, manually operated switches, slide gates, slip blinds, line valves, blocks and similar devices used to block or isolate energy.

<u>Energy Source</u>: Potential energy may include any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.

<u>Lock-Out</u>: Placement of a lock on energy storing equipment or machinery, to ensure the equipment or machine is controlled and cannot be operated until the lock has been removed by the authorized person who initially installed it. The lock-out devices shall indicate the identity of the authorized employee that applied the device.

<u>*Tag-Out:*</u> Placement of a tag on energy storing equipment or machinery that indicates the equipment or machine must not be operated until the tag has been removed by the authorized person who initially installed it.

Lock-Out/Tag-Out Guidelines

While Percheron employees are not typically involved with or responsible for the operations or maintenance of equipment or machines that store energy, they may be required to work around one and it is important that all employees are aware of the dangers associated with them. The following guidelines shall be followed to prevent injury or property damage.

- All energy isolation devices for equipment and machinery must be labeled or identified as in use by an authorized person.
- Energy isolation lock-out/tag-out devices shall be durable, standardized, substantial, identifiable and appropriate/approved for their use.

- Only authorized or affected employees may turn on/off a machine or equipment. The authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the methods or means to control the energy.
- All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source.
- No employee shall attempt to start, energize or use the equipment or machine that has been locked-out.

Sequence of Lock-Out Procedure:

Only authorized employees may perform lock-out. Before lock-out commences, any questionable identification of sources shall be cleared by the employees with their supervisors and a job authorization should be obtained. All affected employees shall be notified that a lock-out system is being utilized on an energy storing device and the reason for it prior to shut down.

- Affected employees shall be notified by the authorized employee of the application of lockout devices or tagout devices.
- The authorized employee shall ensure that no one is operating the machinery before powering down, as sudden loss of power could cause an accident.
- The authorized employee will shut down the machine or equipment using procedures established.
- All appropriate energy isolating devices will be applied as required per lockout/tagout procedures which consists of individually assigned tag, hasp, lock and group lock box when required.
- All potentially hazardous stored, residual or re-accumulated energy shall be relieved, disconnected, restrained or otherwise rendered safe.
- Prior to starting work on machines or equipment the authorized employee shall verify the deenergization and the isolation of the energy of the machine or equipment.
- Machines or equipment should be placed into a safe position prior to performing services or maintenance.
- Safely perform the necessary service or maintenance to the machine or equipment.
- When the job is complete, and equipment is ready for testing or normal service, the following sequence of actions shall be followed: Clear away tools, remove employees, remove the LOTO devices, notify affected employees, energize and proceed with testing.
- Repeat the steps if machine or equipment needs to be de-energized and the control measures must be implemented.

Lock-Out/Tag-Out Application:

- Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
- Lockout devices, where used, shall be affixed in a manner that will hold the energy isolating devices in a safe or off position.
- Tagout devices, where used, shall be affixed in such a manner as will clearly indicate that the operation or movement of energy isolating devices from the safe or off position.
- Where tagout devices are used with energy isolating devices designed with the capability of being locked, the tag attachment shall be fastened at the same point at which the lock would have been attached.

• Where a tag cannot be affixed directly to the energy isolating device, the tag shall be located as close as safely as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device.

Group Lock-Out Procedure

In some instances, multiple employees may be required to lock-out energy storing equipment. If a group lock-out is required, a designated authorized individual such as the supervisor in charge of the group, must place a group lock-out device on the energy isolating device and then each employee must attach his/her personal lock-out device to the group lock-out device before engaging in the servicing and maintenance operation. The supervisor in charge of the group lock-out/tag-out must not remove the group lock-out device until each employee in the group has removed his/her personal device. During shift change or personnel changes, there should be specific procedures and documentation to ensure the continuity of lock-out or tag-out procedures.

Removal of Lockout/Tagout Devices

- All LOTO devices should be removed by the authorized employee that applied them.
- In the circumstance that the authorized employee that applied the LOTO device is not onsite, the device may only be removed when the employer has made reasonable efforts to contact the authorized employee to inform them of removal, and ensure that authorized employee has this knowledge before they resume work at the facility.
- Attempts to contact the authorized employee must be documented.
- Prior to the removal, a site roll call will be conducted to notify and verify location of all employees.
- Once all employees are located and notified, the LOTO device will be removed by an authorized employee.

Training Requirements

Authorized employees:

Shall receive training covering:

- Recognition of hazardous energy sources.
- Types and magnitude of hazardous energy in the workplace.
- Methods, devices, and procedures used to lock-out, verify lock-out, and control hazardous energy on all types of equipment.
- Procedures for removing locks and returning a equipment or machinery to operation.
- Transfer of lock-out responsibilities.
- Group lock-out procedures.

Affected and other employees:

Shall receive instruction on:

- Recognizing when energy control procedures are implemented.
 - When tag-out systems are used including the limitations of a tag.
 - The tag is not to be removed without authorization. The tag is never to be ignored.
- Understanding the purpose of the procedures and the importance of not attempting to start up or use the equipment or machine that has been locked out.

<u>Retraining:</u>

Authorized and affected employees shall receive retraining in proper application of lock-out procedures when there is a change in:

- Job assignments that expose an authorized employee to new hazards or lock-out procedures.
- Machines, equipment, or processes that present a new hazard or require modified lock-out procedures.
- Energy control procedures for a piece or type of equipment.
- Or when it becomes known that an employee incorrectly performs lock-out procedures.

Training Documentation:

Annually the HSE department shall ensure all training/retraining has been completed by required employees and is current. All LOTO training will be documented. The training documentation will identify:

- certifying instructor
- date of training
- objectives
- type of equipment
- procedures
- location

Training records shall be maintained by the HSE Department.

Energy Control Procedure Inspections

An inspection of the energy control procedures for each type of equipment, machine or process will be conducted annually by an authorized employee. The inspector cannot, review his/her own lock-out/tag-out procedures.

The inspection should include the following:

- A review of the energy control procedures and ensure they continue to be implemented properly.
- A review of lock-out/tag-out responsibilities with all authorized employees to lock-out the machine or equipment.
- Ensure authorized and affected employees are familiar with their responsibilities.
- Ensure any deviations or procedural inadequacies are identified are corrected.

Documentation of the inspection must be certified including the date, type of equipment, authorized/affected employees and the inspector. Any deviations or inadequacies identified shall be immediately addressed.

PIPELINE SAFETY

Much of Percheron's work includes being on pipeline right-of-way's; the following information will help ensure the safety of our field personnel working in these areas.

Pipeline Monitoring

Most pipelines are monitored 24 hours per day, seven days per week to ensure the integrity and security of these lines. Sophisticated computers, alarms, meters, and satellite technology may be used to control and monitor pipeline systems. These systems are designed to detect changes in pressure and flow and will be activated if a leak is detected. Some pipelines contain automatic shut-off valves that will isolate a leak.

Markers

For safety, markers show the approximate location of pipelines and identify the companies that operate them. Markers may be anywhere along the right-of-way directly over the pipeline. The pipeline may not follow a straight course between markers. While markers are helpful in locating pipelines, they are limited in the information they provide. They do not provide any information on the depth or the number of pipelines in the right-of-way. Markers may commonly be found where a pipeline intersects a street, highway, or railway. These markers indicate the materials transported in the pipeline, the name of the pipeline operator, and a telephone number where the pipeline operator can be reached in an emergency.

One-Call (811)

Pipeline and utility markers may not show the exact location of buried lines. Pipeline companies and other utilities will mark their pipelines at no cost. Failure to call 811 is the leading cause of damage to buried pipelines. If the Party Chief or other employee suspects that there may be a line, the Project Manager should be notified. The Project Manager will place a call to 811 and arrange to have the line(s) marked.

Potential Hazards of Pipeline Products

Besides petroleum and natural gas, pipelines transport a variety of products. They may contain other types of gases, chemicals, hazardous liquids, refined products or crude oil, as well as nonflammable products. If a leak would occur on the pipeline, some of these products could cause environmental damage. Other products could be highly flammable, or harmful if inhaled, cause eye or skin irritation, and possible difficulty in breathing. Because of these hazards, it is important that all field personnel be able to recognize a pipeline leak.

Recognizing a Pipeline Leak

Even though it is extremely unlikely that a leak will occur, the following are indicators of a possible leak:

- A pool of liquid on the ground near the pipeline
- A dense white cloud or fog over the pipeline
- Discolored vegetation surrounding the pipeline
- An unusual dry spot in an otherwise moist field
- Bubbling in marshlands, rivers, or creeks and/or an oily sheen appearing on water surfaces
- An unusual noise coming from the pipeline, such as a hissing or roaring sound
- An unusual smell or gaseous odor
- Frozen ground at the pipeline during warm weather
- Dirt blowing up from the ground

What to do if you Suspect a Leak

Each surveying crew should have an HS2 monitor and should have received training on how to use the monitor and what steps to take in an emergency situation, which consists of the following:

- Immediately leave the area
- If possible, turn off all equipment being used in or near the suspected leak and move upwind from the leak
- From a safe location, call 911 or local emergency response number, the Field Crew coordinator or Project Manager, and the pipeline company if known
- Warn others to stay away

What *NOT* to do if you Suspect a Leak

If a leak is suspected, it is extremely important that all crew members adhere to the following:

- Do NOT keep the information to yourself. Act now! Start by getting everyone to a safe location.
- Do NOT touch, breathe, or make contact with the leaking liquids or gas. Stay upwind if possible.
- Do NOT light a match, start an engine, use a telephone, turn on or off any type of electrical switch, do anything that may create static or a spark.
- Do NOT attempt to extinguish any pipeline fire that may start.
- DO NOT drive into a leak or vapor cloud area, as automobile engines may ignite the vapors.
- DO NOT attempt to operate valves.

PROCESS SAFETY MANAGEMENT (PSM)

Purpose

The primary purpose of the PSM Standard is to prevent or minimize the unwanted release of hazardous chemicals, especially into locations that would expose personnel to serious hazards.

Policy

It is Percheron's intent to comply with all applicable regulations and to provide a workforce that is trained to safely perform their jobs with a full knowledge of the hazards and safe work practices associated with refining/chemical plant or other PSM regulated industry work. In accordance with the law, employees will receive initial and refresher training in the following:

- An overview of the refinery/chemical plant/facility process and operating procedures for the process that employees will be working with or near, including the hazards of the chemicals used in the process. This will include a complete review of the company HazCom Program and all SDSs that are provided for each unit where the employees will be working;
- Specific safety and health hazards;
- Procedures and safe work practices applicable to the employee's job tasks, including personal
 protective equipment, permits (confined space, hot work and general safe permits, job hazard
 analysis and auditing;
- Incident investigations are required for all incidents. When an incident occurs, an investigation will be immediately implemented, but not longer than 24 hours after the incident. Causal analysis and corrective actions will be documented and tracked for closure. Those records will be kept for a minimum of five years.
- The site-specific Emergency Action Plan.

Employees shall comply with established procedures and safe work practices, be on the alert for changing conditions and quickly report any accidental release or potential release of hazardous chemicals to a supervisor.

Percheron will promptly investigate every incident that results in, or could have resulted in, a dangerous release of a hazardous chemical.

All employees will attend the OWNER's (refinery/chemical plant/facility) process overview and any sitespecific training during the refinery/chemical plant/facility orientation, including the process overview and Emergency Action Plan. Attached is a summary of applicable information taken from the PSM standard.

Process Safety Management of Acutely Hazardous Materials

These regulations contain requirements for **preventing or minimizing the consequences of catastrophic releases** of toxic, reactive, flammable or explosive chemicals. These regulations are intended to eliminate to a substantial degree, the risks to which employees are exposed in petroleum refineries and chemical plants.

- 1. The employer (refinery/chemical plant/facility) shall develop and implement <u>written procedures</u> that provide clear instructions for safely conducting activities involved in each process.
 - A. Steps for Each Operating Phase:
 - 1. Start-up
 - 2. Normal operation
 - 3. Temporary operations
 - 4. Emergency operations, including emergency shutdowns
 - 5. Normal shutdown
 - 6. Start-up following a turnaround, or after an emergency shutdown
 - B. Operating Limits:
 - 1. Consequences of deviation
 - 2. Steps required to correct and/or avoid deviation
 - 3. Safety systems and their functions
 - C. Safety and Health Considerations:
 - 1. Properties and hazards of the chemicals used in the process
 - 2. Precautions necessary to prevent exposure, including PPE
 - 3. Control measures to be taken if physical contact or airborne exposure occurs
 - 4. Safety procedures for opening process equipment (such as pipeline breaking)
 - 5. Verification of raw materials and control of hazardous chemical inventory levels
 - 6. Any special or unique hazards

Note: If Hot Work is to be performed, as with any hot work, a "Hot Work" permit shall be obtained from the client before any work commences (refer to the company hot work/welding policy if applicable).

- 1. A copy of the operating procedures shall be readily accessible to employees who work in or near the process area or to any other person who works in or near the process area.
- 2. The operating procedures shall be reviewed as often as necessary to assure that they reflect safe operating practices, including changes that result from changes in process chemicals, technology and equipment and changes to facilities.
- 3. The employer shall develop and implement <u>safe work practices</u> to provide for the control of hazards during operations such as opening process equipment or piping and control over entrance into a facility by maintenance, contractor, laboratory or other support personnel. These safe work practices shall apply to employees and contractor employees.

Training

- Initial training. Each employee presently involved in operating or maintaining a process, and each employee before working in a newly assigned process, shall be trained in an overview of the process and in the operating procedures. The training shall include emphasis on the specific safety and health hazards, procedures and safe practices applicable to the employee's job tasks.
- **Refresher and supplemental training**. At least every three years, and more often if necessary, refresher and supplemental training shall be provided to each maintenance or operating employee and other workers necessary to ensure safe operation of the facility. The employer in

consultation with employees involved in operation or maintenance of a process shall determine the appropriate frequency of refresher training.

- **Training certification**. The employer shall ensure that each employee involved in the operation or maintenance of a process has received and successfully completed training. The employer, after the initial or refresher training shall prepare a certification record which contains the identity of the employee, the date of training, and the signatures of the persons administering the training.
- **Testing procedures** shall be established by each employer to ensure competency in job skill levels and safe and healthy work practices.

Contractors

- The employer shall inform contractors performing work on, or near, a process of the known potential fire, explosion or toxic release hazards related to the contractor's work and the process, and require that contractors have trained their employees to a level adequate to safely perform their jobs. The employer shall also inform contractors of any applicable safety rules of the facility, and assure that the contractors have so informed their employees.
- The employer shall explain to contractors the provisions of the emergency action plan.
- Contractors shall assure that each of their employees have received training to safely perform their job and that the contract employees shall comply with all applicable work practices and safety rules of the facility.

Trade Secrets

Company employees will respect and maintain the confidentiality of all "Trade Secret" information received and/or gathered from our clients (Owner Facilities). Any and all proprietary information obtained including but not limited to the following is governed by this policy:

- Development of the process hazard analysis
- Development of operating procedures
- Involvement in incident investigations
- Involvement in emergency response or emergency planning
- Involvement in compliance auditing

Management of Change (MOC)

The OWNER (refinery/chemical plant/facility) that is covered by the standard will typically handle all MOC situations, but we need to be aware of the program and be mindful that if we get involved with any changes, the necessary steps will need to take place. The company will establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to facilities that affect a covered process.

Prior to the change, address the following considerations:

- The technical basis for the proposed change;
- Impact of change on safety and health;
- Modifications to operating procedures;

- Necessary time period for the change; and,
- Authorization requirements for the proposed change.

Percheron will train affected employees and contract employees in the change prior to start-up of the process or affected part of the process.

SHORT SERVICE EMPLOYEES

March 9, 2021

A Percheron employee is considered a Short Service Employee (SSE) if he/she has been employed less than three months with Percheron or has been in his/her present role with Percheron less than three months over the previous two years. Short Service Employees shall not work in environments or conditions that prevent experienced team or crew members and or Mentors from supervising the Short Service Employee's work and behavior. Should a client's SSE program require a release period longer than three months Percheron will follow the more stringent program. An employee designated as short service may not work alone and a work crew of three or less individuals may not have more than one Short Service Employee, unless the field supervisor has been advised of the daily tasks to be performed and approved the crew for duty. Percheron shall notify the project coordinator, contractor contact, and/or on-site supervisor of any client facility when Short Service Employees are present on work crews prior to starting work inside the facility. During field operations all Short Service Employees shall be visibly identified through the use of an SSE sticker visibly displayed on the employee's hardhat or a green hardhat. The use of Short Service Employee stickers or hardhats shall be communicated to the project coordinator, contractor contact, and/or on-site supervisor of any client facility concurrently with notification of Short Service Employees on the work crew. Additionally, the use of Short Service Employee stickers or hardhats shall be documented in the Project Safe Work Plan. After three months of service and demonstration of knowledge and competency of Percheron Safety Program requirement, a Short Service Employee will be eligible for review by the assigned Mentor, Supervisor and Corporate Manager of the SSE. The reviewing parties will complete an SSE Evaluation Form (Appendix A). Upon completion of the SSE Evaluation Form and satisfactory review, the SSE can remove the SSE sticker from their hard hat or be issued the standard white Percheron hardhat. The completed SSE Evaluation Form shall be submitted to the HSE Manger and HR Director for addition to the employee's personnel file. Short Service Employees shall be monitored for compliance with HSE policies and procedures. Short Service Employees shall be assigned a mentor on each project. Company Mentors are both knowledgeable and experienced and will not allow short service employees to work alone. Mentors shall assist with development and training of Short Service Employees. This development and training may include but not be limited to the Percheron Safety Program, workflow and processes. Mentoring employee will not be assigned to more than one crew with Short Service Employees. Mentors will remain on site with Short Service Employees while work is being conducted. Percheron recognizes that in some instances, SSEs with relevant skills and experience may demonstrate their abilities before the end of the three-month period. In these cases, Percheron may amend the minimum training requirements upon receiving approval by the client, assigned Mentor, Supervisor and Corporate Manager of the SSE. Early release from the program must have verification and documentation of the competencies listed within this program along with any client-specific requirements. Early release of an employee must follow the guidelines under this program. If any safety violations are identified during the SSE evaluation period, the employee will no longer be eligible for early release. All Percheron subcontractors are required to manage their Short Service Employees in accordance with the requirements of this Short Service Employee program.

STOP WORK AUTHORITY

January 27, 2020

Percheron employees shall receive Stop Work Authority training prior to their initial assignment. Documentation of the training will include employee name, date of training and the subject matter covered. If at any time an employee of Percheron identifies circumstances or conditions that pose a danger or safety risk to him, other employees, or contractors he should immediately stop work and take precautions as described in this manual. No work will resume until all stop work issues and concerns have been adequately addressed. All employees have the authority, responsibility and the obligation to stop any task or operation where concerns or questions regarding the control of HSE risk exist. Employees will not be reprimanded for exercising Stop Work Authority. The free exercise of Stop Work Authority by all Percheron employees is critical to the safety culture at Percheron. No work will resume until all stop work issues and concerns have been adequately addressed.

The employee's immediate supervisor or manager should be informed as soon as safely possible of the conditions. If deemed necessary, the employee may take steps to report the hazards anonymously. Employees will under no circumstances be reprimanded for the reporting of hazards or unsafe activities.

When a Percheron employee identifies an unsafe condition, they should immediately intervene to stop the work. This Stop Work Intervention shall follow the following process:

- 1. Initiate Stop Work, this shall be done in a positive manner
- 2. Coordinate through the supervisor on duty
- 3. Notify all affected personnel and supervision of the Stop Work issue
- 4. Correct the issue
- 5. Resume work when conditions are safe to do so

All Stop Work Interventions will be documented by supervisors. These documents will be supplied to the supervisor or manager and the Safety Committee at safety.percheronllc.com for lessons learned and so corrective measures can be put in place. Reports will also be used to measure participation, determine the quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learnings.

SAFE RETURN TO WORK

February 15, 2016

Thru the incident reporting and investigation procedures, Percheron maintains written records of incident details. In the event of an incident records of communications with the injured employee regarding modified work will be maintained. Workers Compensation and medical records, where applicable, will also be maintained. Such medical records will be kept strictly on a need-to-know basis and secured in a lockable file.

Supervisors will be made aware of job-related restrictions to ensure the modified work meets the physician's orders. Percheron will ensure a good faith effort that modified work tasks being offered are consistent with the medical restrictions listed by the health care provider. Workers must ensure that changes in the scope of the modified work must adhere to the medical restrictions. Modified work is temporary assignment and should not be treated as a permanent change of assignment. The goal of medical restrictions to return the individual to full time work in their previous role as soon as deemed medically fit.

Health care providers in the project or office area will be advised that Percheron provides modified work to injured employees, whenever practicable. Percheron recommends injured employees seek treatment at Occupational Health Clinics and will identify such clinics in the project or office area. If/when this is not practicable, a standard letter may be drafted that outlines the company's modified work opportunities and provided to the employee. In the event of an incident the injured employee should take this letter with them when they visit their health care provider.

The policy shall be communicated to the employees via one or more of the following methods: a safety meeting or toolbox talk, reviewing the policy as part of the new employee orientation, and/or posting the policy in a conspicuous location, etc.

Percheron maintains a list of jobs available to be performed by employees on modified duty. A Physical Demands Analysis (PDA) has been prepared for each of these jobs to ensure workers are placed accordingly. All jobs have been assessed to determine which jobs can be performed by persons working under specific restrictions.

Wherever possible, modified work will be offered to employees who are unable to return to their regular duties following a workplace injury or illness. Modified duty opportunities are offered in an effort to reduced Workers Compensation costs, improved employee retention, enhanced employee morale, reduction in lost time days, and a strengthening of the company's relationship with its employees. Modified duty tasks are intended to be meaningful to the employee and the company, and consistent with work restrictions outlined by the treatment provider.
WORKING NEAR WATER

December 26, 2018

In the normal performance of our work, some employees may on occasion be working near or over water, such as creek and river crossings. Percheron will protect its employees under the OSHA regulations 1926.106 entitled "Working over or near water".

Our employees shall abide by the work rules below when working over or near water that is deep or turbulent enough so that the danger of drowning exists and when the activities to be performed create a potential hazard for drowning. A pre-task plan is required to be completed and signed by all members of the crew that may be working over or near water before the work may begin. This plan shall be included with the daily Job Safety Analysis (JSA) to be completed by each Percheron Survey or Environmental crew before starting daily activities. The plan shall include the current environmental conditions that exist, the scope of work to be conducted, hazards created by conditions and work and the steps taken to mitigate or eliminate the hazards.

Workers shall at all times, when working over or near water that is deep or turbulent enough so that the danger of drowning exists and when the activities to be performed create a potential hazard for drowning, wear Coast Guard Type I approved life jackets. These jackets (PPE) shall be inspected prior to and after each use for defect which could alter their strength or buoyancy. Defective units shall not be used. Ring buoys with at least a 90 ft. line shall be readily available (at the employees' worksite) for emergency rescue operations. On projects that warrant it, ring buoys shall be spaced no greater than 200 ft. apart. These devices (PPE) shall be inspected prior to and after each use for defect which could alter their strength or buoyancy. Defective units for defect which could alter their strength or buoys shall be spaced no greater than 200 ft.

At least one lifesaving skiff shall be immediately available at locations where employees are working over or adjacent to water and where job site specific and environmental conditions support the use of a lifesaving skiff.

Employees working over or near water must be adequately trained in their responsibilities and the safe work practices associated with this task. Under no circumstances will employees who will be performing work over or near water, where the danger of drowning exists, be allowed to work alone at any time.

WORKING ALONE

February 13, 2014

Working alone requires the workplace to be assessed and preventative measures are taken that eliminate or minimize risks when employees work alone. Such measures include employee fitness test, proper employee training, and a working SPOT locator or equivalent system so employees who are working alone can easily contact someone in case of emergency. All the factors must be weighed to decide the most effective approach to achieve employee safety and to determine if a job is out of our range of having employees be working alone.

Isolated Employee

All Departmental Managers/Supervisors are responsible for enforcing this procedure and for ensuring all affected staff are trained and fully understand it. The Department Manager must keep a record of this training.

Work Groups and Communication

It is preferred that Percheron employees always work in groups of no less than two people. If several employees are working in locations where they cannot see each other, they are all responsible for making contact with each other at reasonable periods.

Working Alone Onsite/Workshop

If a Percheron employee is isolated from other persons because of the time, location or nature of work, then the relevant Percheron departmental manager assigning the work and the employee performing the work is responsible for ensuring the following:

- To provide an appropriate telephone contact number when assigning the job to an employee.
- Ensuring the employee telephones the contact number upon site/facility arrival.
- The working employee is responsible for telephoning the contact number on completion of the job, just before leaving the site/facility.
- If no contact is made on completion of work.

If after a reasonable period of time the employee has not phoned to notify the manager/designee of job completion, the department manager must phone the employee.

If there is no response to the telephone call the departmental manager (or a designee living or working near the site/facility) must visit the site to ensure an incident has not occurred.

If the department manager or designee has to visit the site, then an incident investigation form must be completed, and corrective action taken.

If an incident/accident has occurred then the visiting manager/designee will be responsible for informing the appropriate emergency services, or for carrying out any other arrangements, including information all appropriate personnel with the Percheron Incident Reporting & Management guidelines in the safety manual.

Working Alone Offsite in Remote Areas

If a Percheron employee is working in a remote area such that the remoteness of the area poses danger and the employee is isolated from other persons because of the time, location or nature of work, then the Percheron manager assigning the work and the employee performing the work, are responsible for ensuring the following:

- To provide an appropriate telephone contact number/radio base frequency when assigning the job to an employee.
- The employee telephones/radios the contact number/radio base upon leaving the base, advising of the estimated time of arrival (ETA) to remote location.
- The employee telephones/radios the contact number/radio base upon arrival at the remote location.
- The employee is responsible to telephone/radio the contact number/radio base on completion of the job, just before leaving the site/facility, and advise ETA to base or home.

If No Contact is Made When Advised ETA has Passed

If after a reasonable period of time the employee has not notified the manager/designee of arrival at location, job completion or return to base, the department manager must phone/radio the employee. If there is no response, the departmental manager (or a designee, who may be an alternate employee or a member of an emergency service) must visit the site to ensure an incident has not occurred.

If the department manager or designee has to visit the site, then an incident investigation form must be completed, and corrective action taken.

If an incident/accident has occurred then the visiting manager/designee will be responsible for informing the appropriate emergency services, or for carrying out any other arrangements, including informing all appropriate personnel in accordance with the Percheron Incident Reporting & Management guidelines in the safety manual.

Risk Assessment and Preventative Measures

To effectively prevent the risks of working alone, a risk assessment will be conducted to determine work groups that may incur exposure, the risk factors, and the measures to eliminate or minimize the risks. Determining the risk factors and prevention strategies, Percheron will reference:

- Existing policies, systems, processes, procedures, statistics, managers and employees.
- Federal and Provincial Regulations and Codes.

Exposure Determination

Percheron has developed an exposure determination matrix (based upon the risk assessment) which includes work groups that may incur exposure, potential risk factors, risk ratings, and reference to specific measures to eliminate or minimize the risk of working alone (See exposure determination matrix).

Note: All employees are encouraged to provide feedback/input for continual improvement.

Control Measures

Percheron has developed the following control measures:

- Risk Assessment
- Safety Manual
- ERP Visitation Process

Training

Employees are required by the legislation to work safely and cooperate with their employer by following health and safety rules. Percheron management must ensure that:

- All employees have the skills and training needed to perform their work safely.
- All employees are made aware of any dangers on the job site.
- All employees working alone and/or assigned to check on the worker must be trained in the written procedure for checking the worker's well-being.

Employee Training

- Those employees, who work alone, are trained and competent to work safely.
- Make sure employees are aware of the increased risk from carrying out hazardous work alone.
- Upon approaching a lease **STOP, LOOK,** and **LISTEN** to address the lease conditions. **Never** go on a lease where on one is present call and leave a message.
- Employees are to have training in emergency survival (i.e., bear awareness training) when traveling alone to remote locations.
- All employees are to be aware of what they are doing. YOU HAVE THE RIGHT TO REFUSE.

Control Measures

1. Driving Vehicles

The following are safe work procedures for employees traveling while working, especially to remote locations.

- Only qualified Percheron employees will drive company vehicles.
- Vehicle conditions will conform to the Safety Manual, which includes appropriate emergency and first aid supplies.
- Information on higher risk geographical areas and their associated conditions should be obtained from the client (where feasible). In those higher risk areas, operation will consider utilizing the more experienced employees and or those employees familiar with the area. Where practical, an area familiarization tour may be conducted, particularly for new staff.
- Employees will be provided with a means for emergency communication at all times. (Cell phone, twoway radio, pager or Satellite phone).
- Employees will ensure communication devices operate properly by conducting periodic checks at the beginning of a shift, during the shift and as indicated in the Safety Manual.
- Employees will periodically check in with their Manager while traveling to and from work sites; arriving at the work site; periodically during the duration of the job at the work site; and at the end of a job before departing the work site.
- Always assess road conditions before traveling. Discretion is to be used when making the decision to drive. Call the road reports and contact management for advisement.
- Employees of Percheron are required to complete a walk-around of their vehicle before commencing travel. Items such as lights, windows, tire pressure, visibility, and windshield washer fluid should all be checked.
- When traveling, employees are to stop frequently for rests and gas.

- All Percheron vehicles undergo regular maintenance, as per manufacturer's specifications.
- Vehicles are to be equipped with flares/triangles, hazard lights (flashers), fire extinguishers, tools, spare tire, and a First Aid Kit. If traveling to Crown Land, vehicles are required to carry an axe, shovel, and water.

Providing Services

1. Safe Work Procedures

- Implement a safe work procedure if the work is considered hazardous.
- Involve the affected employees in the development of safe work procedures involving hazardous work. Percheron holds safety meetings in which employee feedback and suggestions are encouraged and welcomed in the development of such safe work procedures.
- Employees are required to sign out or phone before a job and provide information on a traveling plan and an estimated time of return. Let your Manager know or use a phone contact person. Be sure to check in and out with the same person.
- Safe work procedures are to be put into place when employees are traveling alone.
- Ensure that employees have adequate rest periods between work periods when they are traveling alone.
- When walking, be aware of your surroundings at all times. Be observant. Pay attention to things like sidewalk conditions and use caution when slippery.
- 2. Equipment Safety
 - Ensure that all equipment is in good working condition prior to be used on a work site.
 - All equipment and machinery used by employees must meet regulatory standards.
 - Equipment and machinery are only to be used in accordance with the manufacturer's specifications.
- 3. Equipment and Supplies
 - Employees are required to carry the appropriate first aid supplies.
 - All employees are required to carry the appropriate personal protective equipment with them.
 - All employees are to be aware and carry emergency supplies if required to work in remote areas or with inclement weather.
- 4. Communication
 - All employees are to have an effective means of communication available to contact persons capable of responding when employees need immediate assistance (i.e., cell phone, telephone, sat phone, etc.)
 - Plans will be established prior to working alone to determine the time interval between checks and the procedures to be followed. If no effective means of electronic communication between the worker that is working alone and Percheron dispatch is available, a work plan must be developed based upon the level of risk of the work that is to be performed. This plan must allow for another competent worker

to perform planned visits on regular intervals as per risk assessment or some alternate means of communication with emergency services and/or Percheron dispatch to exist.

- Management and/or supervisors must designate an establish contact person for the worker and include predetermined intervals for contact and the results must be recorded.
- Employees are required to check in and out with personnel at their home base or at Head Office.
- If using a cell phone while driving, pull over or use the hands free.

Check-In Procedures

- Have a plan for your workday; share this information with your phone contact or management.
- If you become concerned about any specific situation, call your Manager.
- Prepare a route plan, so that you and others know where and when you are expected somewhere. This will define how often and under what circumstances you will check in.
- Keep your designated contact informed of your location and adhere to your call-in schedule.
- Let the client know your schedule and that others know where you are.
- Call and check in when you first arrive and as you leave, especially the first time you go into a new location.

Before/After Business Hours

The following are safe work procedures for employees working alone before or after business hours.

- Let your Manager/Co-worker/spouse know you are working late and when you expect to leave. Provide them with the office/shop number so they can contact you.
- Use established check-in procedures, as described in driving vehicles.

Ref [.] FM-HSF-15		Percheron Quality Document						er: HSE Coordinator				
Rev: 0		Site HSE and Quality Hazard Inspection					App Sr. \ Sr. \	Approved by: Sr. Vice President of HSE Sr. Vice President(s)				
Date: 1st February 2017							Page	Page 1				
This Site HSE and Quality Inspection must be prepared at the worksite. This form must be used in conjunction with the form Job Safety Analysis. All workers at the worksite must have a complete understanding of the hazards, prevention and mitigation measures identified in the JSA. A new Safe Task and Hazard Analysis must be prepared if work conditions change.												
Client Name:		State:		I		Date:						
Associated JSA Number:		County:			P	Percheron Lead:						
Review and check off all that are applicable												
Health and Safety		Health and Safety Continued		Environmental			Service Quality (Tasks Checklist) Continued					
Fire/Electrical		Personal/Work				Г	First time performing task					
□ _{Heat}	□ _{Heat}		Additional PPE required					Maintenance of equipment				
□ Static Charges		□ Fatigue					Equipment load out					
Equipment grounding		□ Changes to program		Excessive Wind			Equipment Transportation					
Hazardous vapors detection		□ Insufficient/incorrect material		Excessive Ice] Site equipment check					
Condition of electrical cords		Wrong equipment for job		Excessive Rain/Flooding			□ Function test Equipment					
Condition of electrical tools (If present)		No training for task or tool		Hazardous vapors detection		C	Clean up equipment after use					
Other:		Simultaneous Operations		Proper Waste Disposal			Other:					
Ergonomics				SDS reviewed and at work site			Rout / Mission					
Manual handling of equipmer	□ Manual handling of equipment		Excessive Noise Job rolls understood properly		 Housekeeping of work area Other: 			Property lines determined				
Working in a tight area	Working in a tight area							Land Owners talked to				
Repetitive motion		U Other:		Service Quality (Tasks Checklist)			Other:					
		Overhead		D Procedur	Procedure Reviewed							
Working above your head		□ Flying/Falling materials		Procedure not available								
Awkward body position		Movement of overhead Equipment		□ Confusing instructions								
Poor lighting		Additional PPE required and being used		Completed required training								
Other:	her:			Cother:								
All Involved Team Members In Statu Inspection												
						,						
							-		-			
Name(Print)		Name(Print)		Name(Print)			Name(Print)					
Signature		s	ignature			Signature	-	Signature	-			
							-		-			
Date		Date		Date			Date					

SUBPART L – PERSONAL PROTECTIVE EQUIPMENT

PERSONAL PROTECTIVE EQUIPMENT (PPE)

February 4, 2013

While the usual scope of work for all Percheron employees may not require the use of Personal Protective Equipment (PPE), a hazard assessment or other review (or a Percheron Client) may determine that PPE is necessary to mitigate exposure risk to employees. Any Employee performing work that requires PPE shall be provided training for the PPE they will be required to use. Percheron or our project partner will provide training to each employee who is required to use PPE. Each such employee shall be trained to know the following: when PPE is necessary; what PPE is necessary; why PPE is necessary; how to properly fit, don, doff, adjust, and wear PPE; the limitations of the PPE; and the proper care, maintenance, useful life, and proper disposal of the PPE. Employee will also be trained to recognize, and bring to the attention of management, defective or damaged PPE. Defective or damaged PPE shall not be used.

Each affected employee shall demonstrate an understanding of the training specified in paragraph of this section, and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE. If Percheron has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph of this section, Percheron shall retrain such employee. Circumstances where retraining is required include, but are not limited to, situations where: changes in the workplace render previous training obsolete, changes in the types of PPE to be used render previous training obsolete, or inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill. All PPE training will be documented (to include employee name, dates of training, and subject covered) and records of training attendance maintained for three years beyond the life of a project or at least 3 years whichever is longer.

All PPE, excluding steel toe boots and weather protection gear, shall be provided by the company. All PPE, both company-owned and employee-owned, shall be maintained in a sanitary and reliable condition at all times. Any employee-owned PPE shall be subject to inspection for adequacy, maintenance, and sanitation. PPE shall be properly fitting and worn in such a manner so as to provide maximum protection.

Minimum Class 2 safety vests should be worn while working on the ground within the right-of-way or any other location where visibility is needed. When working within the road right-of-way a Class 3 safety vest is required. A Class 2 safety vest is acceptable to wear inside company-controlled access zones not related to public roads. All hard hats should meet ANSI Z89.1 standard and should be worn anytime within the right-of-way location. Hand protection should be worn to protect from the elements, as well as sharp edges, abrasions, and other hazards. Eye protection should meet ANSI Z87.1 standard and should be worn whenever there is a hazard that could injure the eye.

SUBPART M – MEDICAL AND FIRST AID

GOOD FAITH EFFORTS OF FIRST AID

In the event of a medical emergency, call 911.

Percheron encourages all employees to complete a CPR and First Aid course from an accredited provider. First Aid and CPR training providers must 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. In the event of an incident requiring medical attention, 911 should be contacted immediately. In the absence of accessible infirmary, clinic and/or immediate medical care, Percheron will ensure personnel are adequately trained to render and make a good faith effort to supply first aid. In the event of cardiac arrest, employees trained in Automated External Defibrillator (AED) use are authorized and encouraged to make use of the device if there is one available.

However, it must be noted that under many circumstances Percheron employees are working alone, with no other Percheron personnel present. For example, if you are working on a project in a rural area and are meeting a landowner on his property, there may be many miles between you and the nearest other Percheron employee or medical assistance. It is wise to provide your Supervisor or Project Manager with your schedule and locations of meetings and to check-in frequently.

To help ensure the safety of our employees, Percheron provides the telephone listing on emergency numbers as well as a first aid kit at our worksites. In areas without 911 coverage, local management (the Project Manager) shall conspicuously post local telephone numbers for physicians, hospitals, and ambulances. Because of the nature of our work, Percheron is not considered to be in the "construction" industry (i.e., not 29 CFR 1926.50) and relies primarily on local emergency responders to meet the OSHA 29 CFR 1910.151(b) standard. In our workplaces, the reasonably expected possibility of a serious workrelated injury occurring is very unlikely. Injuries on Percheron worksites are expected to be rare instances of occasional, common office injuries. We do not reasonably anticipate employees having to perform any first aid. However, Percheron offices and jobsites are provided with first aid kits containing sufficient and appropriate supplies to handle expected injuries. First Aid Kits must be inspected weekly to ensure that dates are within expiration period and of any supplies has been used replacement of supplies is mandatory prior to continuing work. The local management (the Project Manager) is authorized to maintain the workplace first aid kit which shall be properly stored and accessible to employees when needed. Maintenance of the first aid kit by local management (the Project Manager) includes checking the kit monthly, or after any use, to ensure the kit can meet its designed purpose; and to ensure expended items are replaced. The contents of the site-specific first aid kit is listed in the appendices of the Percheron Safety Program.

Our first aid kit is stored in the following location:

FIRST AID KIT CHECKLIST (OFFICE AND TRUCK)

First-Aid Kit Office Checklist

Location:

Inspector: _

Date:

Medical Equipment

- Thermometer Infrared or Single Use Oral
- Unopened Blood Borne Pathogen Kit (nitrile gloves, face mask, apron, face shield, shoe coverings, medical waste disposal bag, absorbent & disinfection
- 🗆 AED Unit
- CPR Equipment (Breathing Barrier 1 way valve) mouth covering,
- □ First Aid / Medical Scissors
- □ Tweezers 1 4"
- 🗆 Snake bite kit
- □ Tweezers
- □ Emergency Blanket
- □ First-Aid Guide
- □ 2 Pair of Nitrile Gloves (1 XL & 1 L)

Over-the-Counter Medication (must not be expired)

- Aspirin 3 Packages
- □ Ibuprofen 3 Packages
- □ Acetaminophen Packages

Antiseptic

- □ Antibiotic wipes 6 packages
- Cotton Balls
- □ Antiseptic Spray 1 Can
- 🗆 Burn Spray 1 Can
- Bug spray
- □ Hydrogen Peroxide 1- 8 oz spray bottle
- □ Antiseptic cream 6 Packages
- □ Eye wash 1- 16 oz bottle
- Bar of soap 1- unopened Package
- □ Hand Sanitizer 1-8 oz bottle



Bandages

- □ Adhesive Tape 1"x5"
- Cold Compress 6"x9"
- Splint
- Triangular bandages
- □ Bandages ¾" x 3"- 16
- 🗆 Elastic Wrap Bandage 1 roll
- □ Gauze Dressing Pad 4x4 2
- Gauze Dressing Pad 8x10 2

July 15, 2020

First-Aid Kit Truck Checklist

Inspector: _

Date:

Medical Equipment

- $\hfill\square$ Thermometer Infrared or Single Use Oral
- □ Unopened Blood Borne Pathogen Kit (nitrile gloves, face mask, apron, face shield, shoe coverings, medical waste disposal bag, absorbent & disinfection
- □ CPR Equipment (Breathing Barrier 1-way valve) mouth covering,
- First Aid / Medical Scissors
- □ Tweezers 1 4"
- 🗆 Tic Key
- □ Emergency Blanket
- □ First-Aid Guide
- \Box 2 Pair of Nitrile Gloves (1 XL & 1 L)
- Disposal Bags
- □ Safety Pins 3

Over-the-Counter Medication (must not be expired)

- Aspirin 3 Packages
- Ibuprofen 3 Packages
- Acetaminophen 3 Packages
- Benadryl 3 Packages
- □ Claritin 3 Packages

Antiseptic

- □ Antibiotic wipes 6 packages
- □ Cotton Balls
- Antiseptic Spray 1 Can
- 🗆 Burn Spray 1 Can
- □ Hydrogen Peroxide 1- 8 oz spray bottle
- □ Antiseptic cream 6 Packages
- $\Box\,$ Eye wash 1- 16 oz bottle
- Bar of soap 1- unopened Package
- □ Hand Sanitizer 1– 8 oz bottle

Bandages

- \Box Adhesive Tape 1"x5"
- \Box Cold Compress 6"x9"
- \Box Splint
- Triangular bandages
- □ Bandages 3⁄4" x 3"- 16
- 🗆 Elastic Wrap Bandage 1 roll
- □ Gauze Dressing Pad 4x4 2
- □ Gauze Dressing Pad 8x10 2
- Liquid bandage
- **Outdoor Essentials**
- □ Bug Spray Deep Woods 40% DEET- 2 cans
- □ DEET Max Spray 100% DEET- 1 bottle
- □ Permethrin Spray 2 bottles
- ⊠ Sunscreen 1 bottle
- □ Safety glasses 3 pair
- Packable First-Aid 1 Kit
- □ Mole Skin (Blister Pad) 1 Roll
- Duct Tape 2"x 5 Yards
- □ Tow Strap
- □ Hand Warmers (depending on season)
- \Box Cold Towels (depending on season)



SUBPART N – ELECTRICAL

ELECTRICAL SAFETY AWARENESS

February 13, 2020

Procedures will be developed and implemented to protect persons working on or near energized electrical equipment.

Definitions

<u>Authorized Person</u>: An individual qualified to work on electrical systems, including energized and deenergized equipment, by virtue of documented training and demonstrated competency who is not employed by Percheron LLC.

De-energized: State in which all electrical energy has been removed from equipment.

<u>Live Electrical Work</u>: Work in which any exposed part of an energized circuit may be touched with the hands, tools or equipment and/or approached in close proximity such that accidental body, tool or equipment contact is possible. Low voltage electrical systems, where minimal hazards exist are excluded from this definition.

<u>Live Electrical Work Checklist & Permit</u>: A written document completed and signed by an authorized person and supervisor prior to initiating live electrical work that verifies appropriate safety precautions have been completed.

<u>Zero Energy State</u>: A state where equipment or machinery systems have had (1) all potential energy sources isolated (i.e., turned off); (2) all potential energy sources secured from reactivation (e.g. locked out); (3) all residual energy relieved from the system; and (4) all system controls activated, with safety verified.

Responsibilities Requirements

<u>HSE Manager</u>: The HSE Manger is responsible to assure that all aspects of the <u>Electrical Safety</u> Program is implemented and followed.

<u>HSE Administrator</u>: The HSE Administrator is responsible for maintaining documentation, coordinating new hire, affected and authorized training, program evaluations, and record keeping.

<u>Supervisors</u>: Supervisors are responsible for being involved in the Electrical Safety Program. They are expected to only allow certified persons perform live electrical work and sign the permit to allow the work to be done.

General Electrical Requirements

• All electrical equipment shall be inspected to make sure there are no exposed wires and is safe from all electrical related issues.

- All exposed de-energized parts will be treated as if they are live.
- All electrical equipment shall be used only for its approved and listed purpose. Electrical equipment in wet or damp locations must be designed for such use. All electrical equipment must have manufacturer information labeling.
- All electrical panels, circuit breaker boxes and similar equipment must have three feet of working space in front of the equipment.
- All live parts must be guarded against accidental contact.
- All electrical equipment shall be effectively guarded.
- Prior to any electrical work all Lockout/Tagout procedures will be followed.

Extension Cords, Power Cords and Cables

- All extension cords, power cords and cables must be maintained in good condition with no exposed wiring. They must be inspected quarterly. Any cord found to be defective, must be immediately pulled from service.
- Extension cords, power cords and cables must not be:
- Permanently attached to any building surface.
- Run through holes or openings in walls, ceilings, or floors.
- Concealed behind walls, ceiling, or floors.

General Requirements for Live Electrical Work

- Percheron LLC does not employ qualified persons to perform electrical work. Live equipment will be de-energized and be locked out before contracted personnel work on these systems.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Under selected situations, only contracted *authorized personnel* may work on live electrical systems only after it has been determined that:
- De-energizing introduces additional or increased hazards, (Examples of increased or additional hazards include, deactivation of emergency alarm systems, shutdown of hazardous location ventilation equipment, or removal of illumination for an area) or;
- De-energizing is infeasible due to equipment design or operational limitations. (Examples of infeasibility due to equipment design or operational limitations include testing of electric circuits that can only be performed with the circuit energized and work on circuits that form an integral part of a continuous industrial process that would otherwise need to be completely shut down in order to permit work on one circuit or piece of equipment.).
- Only trained and certified personnel will be allowed to be around and perform live electrical work. The training and certification shall be from a recognized training or educational organization.
- Conductive articles and clothing will be prohibited in or near the vicinity of all electrical work.
- Live electrical work procedures will include specific personal protective equipment requirements (e.g. use of insulated gloves, aprons, eye and face protection, etc) for representative tasks.
- Appropriate non-conductive, insulated tools and equipment will be used by authorized persons working on energized equipment.
- Portable ladders shall have nonconductive siderails if they are used where the employee or the ladder could contact exposed energized parts.

Permit Requirements for Live Electrical Work

- A live electrical work checklist and permit will be completed prior to initiating a live electrical work task. Permits will be signed by the authorized person and their supervisor.
- Provisions will be made to ensure the continuity of electrical hazard protection during shift or personnel changes.

Training

Affected persons will have documented annual training on basic electrical awareness and precautions.

Records Retention

Training records, completed live electrical work permits, and annual live electrical work safety procedure audits will be retained for at least three years.

GROUND FAULT PROTECTION (GFCI)

February 20, 2020

This section covers Percheron's program for protecting employees from hazardous electrical energy due to equipment malfunctions, defects, or improper grounding. OSHA requires that employers shall use either ground-fault circuit interrupters or an assured equipment grounding conductor program to protect employees on worksites.

Definitions

<u>Competent Person</u>: means one who can identify 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. The competent person is designated to implement the program.

<u>Ground Fault Circuit Interrupter (GFCI)</u>: is a device to protect against electric shock.

Responsibilities

Management: Management is responsible for the following:

- Ensure that the HSE Management System includes a Ground Conductor and GFCI Employee Protection Program and that the program is reviewed annually and revised as necessary.
- Provide Ground Conductor and GFCI training for all affected Percheron employees.
- Provide leadership and support for employees in communicating their responsibility to stop the work when observing unsafe behaviors or unsafe conditions.
- Provide resources to implement and maintain the Ground Conductor and GFCI Employee Protection Program.

Supervision: Supervisors are responsible for the following:

- Understand and enforce Percheron's Ground Conductor and GFCI Employee Protection Program.
- Ensure that GFCI's are tested a minimum of once every three (3) months by a competent person.
- Ensure that all tests and inspections required by the Assured Grounding Program are conducted by a competent person.
- Provide on-the-job training for all affected employees regarding Percheron's Ground Conductor and GFCI Employee Protection Program.
- Provide guidance for all employees in recognizing defective, damaged, or out of compliance electrical cords, receptacles and equipment.
- Document and maintain all records (training, tests, inspections) required by this program.

Employees: Percheron Employees are responsible for the following:

- Percheron employees are to stop the work and immediately inform their supervisor if they suspect the work is unsafe or a hazard exists that was not identified on the JSA and control methods discussed.
- Understand the meaning of Ground Assurance Program Color Coding System and the current color of month.
- Visually inspect all cord sets, attachment cap, plugs and receptacles of cord sets, and any equipment connected by cord and plug for damage, defects, or signs of wear daily or prior to use.
- Remove from service all equipment found or suspected of having damage, defects or excessive wear. Report this equipment to your supervisor or the tools and equipment manager.

Ground-Fault Circuit Interrupters (GFCI)

- GFCI's All 120-volt, single-phase 15- and 20-ampere receptacle outlets used by Percheron employees as temporary power for construction and maintenance, and which are not part of the permanent wiring of the facility, shall have approved ground-fault circuit interrupters (GFCI's) for personnel protection.
- Testing GFCI's All GFCI's shall be tested once every three (3) months to make sure they are working properly and are protecting employees from electric shock.
 - 1. To test the receptacle GFCI, first plug a test-light or shop-light into the outlet. The light should be ON. Then, press the "TEST" button on the GFCI. The GFCI's "RESET" button should pop out, and the light should go out.
 - 2. If the "RESET" button pops out but the light does not go out, the GFCI has been improperly wired. Contact a qualified electrician to correct the wiring errors.
 - 3. If the "RESET" button does not pop out, the GFC1 is defective and should be replaced.
 - 4. If the GFCI is functioning properly, and the lamp goes out, press the "RESET" button to restore power to the outlet.

Assured Equipment Grounding Conductor Program

- The following Assured Grounding Program shall be implemented and maintained on all Percheron worksites. This program covers all cord sets and receptacles that are not a part of the permanent wiring of the facility, and equipment connected by cord and/or plug used by Percheron employees.
- The Assured Grounding Program shall comply with the following minimum requirements:
 - The written copy of this program and the specific procedures that follow shall be available at each jobsite for inspection and copying by OSHA and any affected employee.
 - One or more "competent person" shall be designated at each jobsite to implement and maintain the program.
 - Each cord set, attachment cap, plug and receptacle of cord sets, and any equipment connected by cord and plug, shall be visually inspected before each day's use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal damage. Equipment found damaged or defective shall not be used.
 - The following tests shall be performed as a minimum once every three (3) months on all cord sets and receptacles covered by the program and cord and plug-connected equipment required to be grounded:
 - All equipment grounding conductors shall be tested for continuity and shall be electrically continuous.
 - Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductor. The equipment grounding conductor shall be connected to its proper terminal.
- All required tests shall be performed:
 - Before first use.
 - Before equipment is returned to service following any repairs.
 - Before equipment is used after any incident which can be reasonably suspected to have caused damage (for example, when a cord set is run over).
 - At intervals not to exceed 3 months, except that cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months.

- Equipment not satisfying the above requirements shall not be used.
- Each receptacle, cord set, and cord and plug-connected equipment shall be uniquely identified by a marking or tagging method suitable for the environment. Tests and inspections shall be recorded on a Percheron "Assured Grounding Program Test and Inspection Form" in Appendix A and shall identify each receptacle, cord set, and cord and plug-connected equipment that passed the test and shall indicate the date it was tested.
- A copy of the latest inspection shall be kept on the jobsite as required by 29 CFR 1926.404(b) (1)(iii)(G) for inspection by OSHA and any affected employee.
- Failed and damaged equipment shall be tagged "Do Not Use" and removed (isolated) from service until repaired or replaced.
- Tested and inspected equipment shall be Color Coded using plastic or vinyl electrical tape placed on one or both ends of cords and cord- and plug-connected equipment to denote the month that the tests were performed.

Assured Equipment Grounding Conductor								
Program Color Code								
Month #	Month Torted	Color of Tape(s) to						
WORTH #	wonut resteu	Apply to Cord						
1	January	White						
2	February	White +	Yellow					
3	March	White +	Blue					
4	April	Green						
5	May	Green +	Yellow					
6	June	Green+	Blue					
7	July	Red						
8	August	Red+	Yellow					
9	September	Red+	Blue					
10	October	Orange						
11	November	Orange +	Yellow					
12	December	Orange +	Blue					

Training

All Percheron affected employees shall receive "Ground Conductor and GFCI Employee Protection Program" training. Training Content includes:

- Purpose & Policy
- Employee Responsibilities
- Ground-Fault Circuit Interrupters (GFCI)
- GFCI's Testing Procedure
- Assured Grounding Program
- Program Color Code
- Reporting & Documentation

Training Frequency - "Ground Conductor and GFCI Employee Protection Program" training shall be included in the Equipment & Electrical Grounding training and shall be refreshed annually.

Reporting and Recordkeeping

The Percheron HSE department shall maintain all "Ground Conductor and GFCI Employee Protection Program" records.

- Inspection & Testing Records shall be collected weekly by site supervisors. A copy of the latest inspection shall be kept on the jobsite as required by 29 CFR 1926.404(b) (1) (iii)(G).
- Training Records shall be forwarded to the HSE Department.
- Records shall be retained as follows:
- Inspection and Testing records shall be retained for five years.
- Training Records shall be retained for a minimum of the employee's duration of employment.

SUBPART O – OCCUPATIONAL ENVIRONMENT

INFECTION CONTROL POLICY

April 20, 2021

Percheron has developed the following response to any confirmed case or direct exposureto occupational infection in our work locations. Please follow the plan described below in the event of a confirmed case of or related occupational infections or an exposure to a confirmed case by any Percheron Staff.

Notify Local Staff

- In the event of a confirmed case of occupational infections affected employee should immediately notify the local Percheron staff by email or phone and not return to work until you received work release from your physician's office. In addition, affected employee should identify all individuals who worked in close proximately (three to six feet) in the past 14 days.
- In the event of exposure to a confirmed case of OCCUPATIONAL INFECTIONS, affected employee should immediately isolate themselves and notify the local Percheron supervisor.
- Staff should be notified of the issue and advised not to return to the office until they are notified to do so.

Notify Percheron Management

- In the event of a confirmed case of occupational infections or exposure to a confirmed case by a Percheron staff member, localstaff member should immediately notify Percheron Management. This should include the Percheron HSE team and the business unit or department head as well.
- We ask for any personal health related information to be kept confidential. For example, we can say "We have asuspected/confirmed case of occupational infections with a Percheron employee." We should not disclose employee'sname and only notify on as need to know basis.
- Safety Hotline: (866) 839-1308

Client Notification:

- Any clients serviced by the office and employee should be notified promptly and advised of the situation.
- The communication to the client should include the contents of this response plan and that the situation is beinghandled according to the plan.
- Any staffing changes or back-filling of impacted employees will be addressed as promptly as possible.

Office Cleaning:

- In the event of any confirmed case or direct exposure of Percheron staff, the office they report to (if a PercheronManaged office) will be promptly shut down to all access for a deeper cleaning
- This cleaning will follow CDC guidelines. These guidelines can be found at https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html These itemswill include the following

- close off areas used by the ill persons and wait as long as practical before beginning cleaning anddisinfection to minimize potential for exposure to respiratory droplets.
- Open outside doors and windows, if possible, to increase air circulation in the area. If possible, wait upto 24 hours before beginning cleaning and disinfection.
- Cleaning staff should clean and disinfect all areas (e.g., offices, bathrooms, and common areas) used bythe ill persons, focusing especially on frequently touched surfaces.
- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, diluted household bleach solutions, alcohol solutions with at least 70% alcohol, andmost common EPA-registered household disinfectants should be effective.
 - Diluted household bleach solutions can be used if appropriate for the surface. Follow manufacturer's instructions for application and proper ventilation. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.
- Prepare a bleach solution by mixing:
 - 5 tablespoons (1/3rd cup) bleach per gallon of water or
 - 4 teaspoons bleach per quart of water
- Products with EPA-approved emerging or previous viral pathogens are expected to be effective against OCCUPATIONAL INFECTIONS based on data for harder to kill viruses. Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method and contact time, etc.).
- For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces.
- Cleaning staff should wear disposable gloves and gowns for all tasks in the cleaning process, including handling trash. •Gloves and gowns should be compatible with the disinfectant products being used.
- Additional PPE might be required based on the cleaning/disinfectant products being used and whether is a risk of splash.
- Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area. Be sure to clean hands after removing gloves.
- Gloves should be removed after cleaning a room or area occupied by ill persons. Clean hands immediately after gloves are removed.
- Cleaning staff should immediately report breaches in PPE (e.g., tear in gloves) or any potential exposures to their supervisor.
- Cleaning staff and others should clean hands often, including immediately after removing gloves and after contact with an ill person, by washing hands with soap and water for 20 seconds. If soap and waterare not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains 60%-95% alcohol may be used. However, if hands are visibly dirty, always wash hands with soap and water.

Return to Office:

Percheron staff will not return to the office or occupy the office until cleaning is complete and the risk of additional infection is mitigated against.

COLD RELATED ILLNESSES

June 19, 2018

During cold weather, an employee's body will use energy to maintain a normal internal body temperature. This will result in a shift of blood flow from employee's extremities (hands, feet, and legs) and outer skin to the employee's core (chest and abdomen). If this happens, cold-related illnesses and injuries may occur if exposed to cold conditions for an extended period of time.

The most common types of Cold Stress, Symptoms, and First Aid are:

- Hypothermia
- Frostbite
- Trench Foot
- Chilblains
- Dehydration

Hypothermia

Hypothermia is a potentially serious health condition. Hypothermia occurs when body heat is lost faster than it can be replaced. When the core body temperature drops to approximately 95°F, the onset of symptoms normally begins and are identified below under early symptoms. As the body temperature continues to fall the symptoms will worsen. Once the body temperature falls to around 85°F severe hypothermia will develop, and the person may become unconscious, and at 78°F, vital organs may begin to fail. Symptoms of severe hypothermia are listed below under late symptoms.

Early symptoms of Hypothermia include:

- Shivering
- Slurred speech
- Fatigue
- Loss of coordination
- Confusion and disorientation

Late symptoms of Hypothermia include:

- No shivering
- Blue skin
- Dilated pupils
- Slowed pulse and breathing
- Loss of consciousness

First Aid

Treatment depends on the severity of the hypothermia.

Take the following steps to treat an employee with mild hypothermia.

- Move to a warm area and stay active.
- Remove wet clothes and replace with dry clothes or blankets.
- Warm the center of their body first (Chest, neck, head, groin) using blankets, skin to skin contact, clothing, towels, or sheets.
- To promote metabolism and assist in raising internal core temperature to drink a warm (not hot) sugary drink. Avoid drinks with caffeine.

Take the following steps to treat an employee with severe hypothermia:

- Perform the steps listed above for treatment of mild hypothermia.
- Contact emergency medical personnel (Call 911 for an ambulance).
- If victim has no pulse, begin cardiopulmonary resuscitation (CPR) until emergency medical personnel arrive.

Frostbite

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.

Symptoms of Frostbite include:

- Reduced blood flow to hands and feet (fingers or toes can freeze).
- Numbness
- Tingling or stinging
- Aching
- Bluish or pail skin, waxy in appearance
- Blisters in more severe cases

First Aid

Take the following steps to treat an employee with frostbite:

- Wrap the area in a soft cloth and move to a warm room or vehicle.
- Contact emergency medical personnel.
- Immerse the affected area in warm-not hot water (the temperature should be comfortable to the touch for unaffected parts of the body. Temperature should not exceed 105 °F)
- Warm the affected areas using body heat.
- Do not warm the area using a heating pad, stove, fireplace or any heat source that could easily burn the numb area.
- Do not walk on or use extremities if possible, to prevent causing more damage.
- Do not rub the area to warm it to prevent causing more damage.
- Do not leave the employee alone.
- Do not pour water directly on the affected part.
- If there is a chance that the affected part will get cold again do not warm. Repeated heating and cooling of the skin may cause severe tissue damage.

Trench Foot

Trench Foot is caused by having feet exposed to damp, unsanitary and cold conditions including water at temperatures above freezing for long periods of time. It is similar to frostbite but considered less severe. Injury occurs because wet feet lose heat 25-times faster than dry feet. Therefore, to prevent heat loss, the body constricts blood vessels to shut down circulation in the feet. Skin tissue begins to die because of lack of oxygen and nutrients and due to the buildup of toxic products.

Symptoms of trench foot include:

- Red skin
- Numbness

- Leg cramps
- Swelling
- Tingling, itching, or burning sensation
- Blisters or ulcers
- Bleeding under the skin
- Gangrene (foot may turn dark purple, blue, or gray)

First Aid

Take the following steps to treat an employee with trench foot:

- Remove shoes/boots and wet socks.
- Soak feet in warm water, dry to affected area gently, and then wrap with dry cloth bandages.
- Drink a warm, sugary drink.
- Seek medical attention if necessary.

Chilblains

Chilblains are caused by the repeated exposure of skin to temperatures just above freezing to as high as 60 °F. The cold exposure causes damage to the capillary beds (groups of small blood vessels) in the skin. This damage is permanent, and the redness and itching will return with additional exposure. The redness and itching typically occurs on cheeks, ears, fingers, and toes.

Symptoms of chilblains include:

- Red skin
- Itching
- Blistering or ulceration
- Inflammation

First Aid

Take the following steps to treat an employee with chilblains:

- Slowly warm the skin.
- Apply corticosteroid creams to relieve itching and swelling.
- Keep blisters and ulcers clean and covered.
- Avoid scratching.
- Avoid additional skin exposure to weather conditions just above freezing to as high as 60 °F.

Dehydration

It is easy to become dehydrated during cold weather. Dehydration is a lack of total body water, with an accompanying disruption of metabolic process. Dehydration occurs when water loss exceeds water intake, due to physical work, exercise, or extreme high or low environmental temperatures.

Symptoms of dehydration include:

- Increased thirst
- Dry mouth
- Weakness or light-headedness (particularly if worse upon standing)
- Darkening of the urine or a decrease in urination.
- Muscle cramps

• Nausea and vomiting

First Aid

Take the following steps to treat dehydration:

- Drink water in frequent small amounts.
- Drink fluids that contain electrolytes (i.e. Gatorade) that are lost during work-related activities. Avoid caffeinated drinks.
- In severe cases intravenous fluid (IV) may be required.

Prevention of Cold-Related Illnesses

Just as with heat-related illness, cold-related illnesses and injuries are dangerous and potentially life threating. There are several environmental factors that can contribute to cold stress:

- Cold temperatures
- High or cold wind
- Dampness
- Cold water

The following methods may prevent a cold-related injury or illness:

- Acclimation Employees exposed to the cold should be physically fit, without any circulatory, metabolic, or neurologic diseases that may place them at increased risk for hypothermia. A new employee should not be required to work in the cold full-time during the first days of employment until they become adjusted to the working conditions and required protective clothing. New employees should be introduced to the work schedule slowly and be trained accordingly.
- Engineering Controls (Indoors with heat) Safe work practices for employees working indoors with heat, the best way to prevent cold-related illness is to make the work environment warmer. Where and if possible, use heaters to warm the work area. Alternatively, decrease the general ventilation as much as possible by closing windows or doors.
- Engineering Controls (Outdoors/Indoors w/out heat) Safe work practices for employees working
 outdoors or indoors without heat, should schedule work during the warmer times of the day and
 take scheduled and frequent breaks in warm areas. If available, use wind barricades to block the
 wind from the employees or radiant heaters in outdoor stations. Ensure there is plenty of water
 to drink and take water breaks as needed. Immediately report any problems to a supervisor.
 Supervisors should consider scheduling the most work for the warmest part of the day, assigning
 extra employees to high demand tasks that will require longer periods in cold areas. All employees
 should watch out for the safety of their coworkers.
- Personal Protective Equipment (PPE) PPE is an important factor in preventing cold stressrelated illnesses and injuries. Employees should adhere to the following recommendations when dressing for work in a cold environment:
 - 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 wet; 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.
 - Wear insulated boots or other footwear.
 - Do not wear tight clothing; loose clothing provides better ventilation.
 - Keep a change of clothing available in case work clothes become wet.
- Protective Clothing Protective Clothing is an 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 wet. 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.
- Wear insulated boots or other footwear.
- 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.
- Drinking Liquids Drinking plenty of clear liquids (water or fluid containing electrolytes) and avoiding caffeine and alcohol. It is easy to become dehydrated in cold weather.
- Buddy System Percheron will us the "Buddy System" to ensure that no employee is working alone in cold work environments. By working in pairs employees can monitor each other and watch for signs of cold stress. Immediately report to your supervisor the symptoms or signs of cold-related illness.
- Maintaining Energy Levels Cold temperatures can cause fatigue more rapidly since energy is needed to keep muscles warm. Take frequent breaks and consume warm, high-calorie food such as pasta to maintain energy reserves.
- The Cold Stress Equation OSHA has incorporated information obtained from the American Conference of Governmental Industrial Hygienists (ACGIH) threshold limit values into the Cold Stress Equation. As the temperature decreases and/or the wind speed increases, the potential for cold stress-related illnesses and injuries increases.

Cold Weather-Related Procedures include, but are not limited to:

- Effective communication by voice, observation, or electronic means.
- Observation of employees for alertness and signs/symptoms of cold illness.
- Designating one or more employees on each worksite as authorized to call for emergency medical services.
- Reminding employees to drink water throughout the shift.
- Conduct an assessment at project conception, throughout the life of the project, and prior to changing weather conditions, to identify the types of jobs and employees that are at risk for cold related illnesses and injuries. Pre-shift meetings shall be conducted before the beginning work to identified employees to review the cold condition procedures, encourage drinking water, and remind them of their right to take a break to warm up when necessary. An inspection of cold-weather supplies (e.g. hand warmers, jackets, shovels, etc.) should be carried out regularly during cold weather to ensure that supplies are always in stock. Documentation of assessments and pre-shift meetings shall be maintained.
- Identification of the key physical/personal factors prior to performing a task that plays a role in the contribution of cold-related illness such as:
 - Duration of exposure
 - Clothing material
 - Fitness of employee
 - Drug use /alcohol use of employee that or the previous day

- Cold prevention procedures shall be in writing and made available to employees.
- All Percheron employees with supervision responsibilities shall be trained to recognize the symptoms of cold stress illness, mitigation of potential hazards of cold prior to supervising employees in these environments.
 - Supervisors will review the cold illness and emergency response procedures to prevent cold illness with work crews and to observe and recognize if any employee exhibits symptoms consistent with possible cold illness.
- Supervisors shall ensure all employees have received Cold-Related Illness Awareness training prior to working in such conditions. Annual training regarding the health effects of cold exposure, proper rewarming procedures, recognition and first aid for frostbite and hypothermia, required protective clothing, proper use of warming shelters, the buddy system, vehicle breakdown procedures, and proper eating and drinking habits for working in the cold.
- All employees who are performing work in cold conditions will be update in CPR and first aid treatment on cold-induced injuries or illnesses.

Hazards of Winter Weather –

In addition to cold weather and the related illnesses previously discussed, winter weather also presents other hazards such as:

- Slippery Surfaces
- Snow and Ice Build-ups
- Icicles and Ice Dams

Slippery Surfaces

During the winter months surfaces such as roads, walkways, or paths may become slippery due to snow and ice. When temperatures rise above freezing, fallen snow begins to melt. As the temperature drops below freezing again, the melting snow quickly turns into ice. Ice can be transparent, also known as black ice, making it difficult to see.

The following methods may prevent against slipping on icy or snow-covered surfaces:

- Regularly used walkways and travel ways shall be sanded, salted, or cleared of snow and ice as soon as practicable.
- Employees should wear water resistant boots with good traction and insulation.
- Walking at a slower pace and in short steps allows the ability to react to slippery areas and regain traction.

Snow and Ice Build-ups

Each winter, employees may be working in locations that receive heavy amounts of snow and ice which can accumulate quickly. Snow and Ice build-up can weigh up to 30 lbs per square foot and when it becomes unstable it poses a risk for injury. Unstable snow can pile on roofs and overhangs making it dangerous to stand near buildings and even cause structures to weaken if it is heavy enough and not cleared.

The following methods may prevent against injury from heavy and unstable snow:

- Avoid large snow piles built up from clearing roads and walkways.
- Employees should use caution entering in buildings or working around surfaces that have heavy amounts of snow piled on them such as roofs and overhangs.
- Steer clear of high-voltage equipment that is covered in snow or damaged.

- Check for snow and ice build-up around pipeline natural gas meters, service connections to a building or house, and vents. Snow falling from the roof can damage a meter or service connection resulting in a gas leak and ice can block the vents resulting in carbon monoxide poisoning inside.
- Avoid walking in snow covered terrain to prevent awkward foot placement resulting in injury.

Icicles and Ice Dams

An ice dam is a ridge of ice that forms at the edges of a roof due to poorly insulated ceilings and attic area under the roof. As the heat from the house/building moves up to the snow-covered roof, the higher points of the roof warm, causing snow to melt and water to drain down to the lower and more cold portions of the roof (or the edges). The water creates an ice build-up or dam, preventing melting snow from draining off the roof. The water that backs up behind the dam can cause several problems and dangers such as:

- The freezing dripping water forms into icicles that can grow large. These icicles, and the large mass of ice behind them, break off and can cause structural damage, as well as injure, and even kill, people who are underneath them when the fall off.
- Rotted and weakened building structures such as the roof decking, rafters, and exterior and interior wall framing and sheathing.
- Respiratory illnesses (allergies, asthma, etc.) caused by mold growth.

HEAT RELATED ILLNESSES

June 19, 2018

A healthy body temperature is maintained by sweating. As body temperature increases, the body tries to maintain its normal temperature by transferring heat. When the body has more heat than it can lose, heat-related illness occurs. Workers who are exposed to extreme heat or work in hot environments may be at risk of heat stress. Exposure to extreme heat can result in occupational illnesses and injuries. Heat stress can result in heat stroke, heat exhaustion, heat cramps, or heat rashes. Heat can also increase the risk of injuries in workers as it may result in sweaty palms, fogged-up safety glasses, and dizziness. Burns may also occur as a result of accidental contact with hot surfaces or steam.

The most common types of Heat Stress, Symptoms, and First Aid are:

- Heat Stroke
- Heat Exhaustion
- Heat Syncope
- Heat Cramps
- Heat Rash
- Sun Burn
- Dehydration

Heat Stroke

Heat stroke is the most serious heat-related disorder. It occurs when the body becomes unable to control its temperature: the body's temperature rises rapidly, the sweating mechanism fails, and the body is unable to cool down. When heat stroke occurs, the body temperature can rise to 106 degrees Fahrenheit or higher within 10 to 15 minutes. Heat stroke can cause death or permanent disability if emergency treatment is not given.

Symptoms of heat stroke include:

- Hot/dry skin (no sweating)
- Hallucinations
- Chills
- Throbbing headache
- High body temperature
- Confusion/dizziness
- Slurred speech

First Aid

Take the following steps to treat an employee with heat stroke:

- Call 911 and notify their supervisor.
- Move the employee to a cool shaded area.
- Cool the worker using methods such as:
 - Soaking their clothes with water.
 - Spraying, sponging, or showering them with water.
 - Fanning their body.

- Employees will be placed in a shaded area that is either open to the air or provided with ventilation or cooling.
 - Such access to shade shall be permitted at all times.

Heat Exhaustion

Heat exhaustion is the body's response to an excessive loss of the water and salt, usually through excessive sweating. Workers most prone to heat exhaustion are those that are elderly, have high blood pressure, and those working in a hot environment.

Symptoms of heat exhaustion include:

- Heavy sweating
- Extreme weakness or fatigue
- Dizziness, confusion
- Nausea
- Clammy, moist skin
- Pale or flushed complexion
- Muscle cramps
- Slightly elevated body temperature
- Fast and shallow breathing

First Aid

Treat a worker suffering from heat exhaustion with the following:

- Have them rest in a cool, shaded or air-conditioned area.
- Have them drink plenty of water or other cool, nonalcoholic beverages.
- Have them take a cool shower, bath, or sponge bath.

Heat Syncope

Heat syncope is a fainting (syncope) episode or dizziness that usually occurs with prolonged standing or sudden rising from a sitting or lying position. Factors that may contribute to heat syncope include dehydration and lack of acclimatization.

Symptoms of heat syncope include:

- Light-headedness
- Dizziness
- Fainting

First Aid

Workers with heat syncope should:

- Sit or lie down in a cool place when they begin to feel symptoms.
- Slowly drink water, clear juice, or a sports beverage.

Heat Cramps

Heat cramps usually affect workers who sweat a lot during strenuous activity. This sweating depletes the body's'salt and moisture levels. Low salt levels in muscles cause painful cramps. Heat cramps may also be a symptom of heat exhaustion.

Symptoms of heat cramps include muscle pain or spasms usually in the abdomen, arms, or legs.

First Aid

Workers with heat cramps should:

- Stop all activity and sit in a cool place.
- Drink clear juice or a sports beverage.
- Do not return to strenuous work for a few hours after the cramps subside because further exertion may lead to heat exhaustion or heat stroke.
- Seek medical attention if any of the following apply:
 - The worker has heart problems.
 - The worker is on a low-sodium diet.
 - The cramps do not subside within one hour.

Heat Rash

Heat rash is a skin irritation caused by excessive sweating during hot, humid weather. Symptoms of heat rash include:

- Heat rash looks like a red cluster of pimples or small blisters.
- It is more likely to occur on the neck and upper chest, in the groin, under the breasts, and in elbow creases.

First Aid

Workers experiencing heat rash should:

- Try to work in a cooler, less humid environment when possible.
- Keep the affected area dry.
- Dusting powder may be used to increase comfort.

Sunburn

Redness and pain of the skin.

Symptoms of Sunburn include: Redness and swelling of the skin. In severe cases swelling of skin, blisters, fever, headaches.

First Aid

Workers Experiencing Sunburn should:

- Apply ointments for mild cases if blisters appear and do not break.
- If <u>http://www.nws.noaa.gov/os/heat/images/sunburn.jpg</u>breaking occurs, apply dry sterile dressing.
- Serious, extensive cases should be seen by a physician.

Dehydration

It is easy to become dehydrated during hot weather. Dehydration is a lack of total body water, with an accompanying disruption of metabolic process. Dehydration occurs when water loss exceeds water intake, due to physical work, exercise, or extreme high or low environmental temperatures.

Symptoms of dehydration include:

- Increased thirst
- Dry mouth
- Weakness or light-headedness (particularly if worse upon standing)

- Darkening of the urine or a decrease in urination.
- Muscle cramps
- Nausea and vomiting

First Aid

Take the following steps to treat dehydration:

- Drink water in frequent small amounts.
- Drink fluids that contain electrolytes (i.e. sports drinks or electrolyte powders that are added to water) that are lost during work-related activities. Avoid caffeinated drinks and alcohol.
- In severe cases intravenous fluid (IV) may be required.

Prevention of Heat-Related Illness

Heat-related illnesses and injuries are dangerous and potentially life threatening. There are several environmental factors that can contribute to heat related stress, such as:

- High Air Temperature
- High Humidity
- Direct Sun Exposure
- Heavy Physical Labor
- Rapid Exposure to Hot Environments
- Radiant Heat Sources
- Limited Air Circulation

The following methods may prevent a heat-related injury or illness:

- Acclimation Employees exposed to the heat should be physically fit, without any diseases that
 may place them at increased risk for heat stroke. A new employee should not be required to work
 in the heat full-time during the first days of employment until they become adjusted to the
 working conditions and required protective clothing. New employees should be introduced to the
 work schedule slowly and be trained accordingly.
- Engineering Controls (Indoors with Air Conditioning) Safe work practices for employees working indoors with Air Conditioning, the best way to prevent heat-related illness is to make the work environment cooler. Where and if possible, use air conditioners or fans to cool the work area.
- Engineering Controls (Outdoors/Indoors w/out Air Conditioning) Safe work practices for employees working outdoors or indoors without air conditioning, should schedule work during the cooler times of the day and take scheduled and frequent breaks in an area that is shaded or has an air conditioner (vehicle) or a fan (breakroom). If available, use reflective shields to redirect radiant heat from the employees and insulate hot surfaces and if indoors without air conditioning, increase the general ventilation as much as possible by opening doors or windows. Ensure there is plenty of water to drink and take water breaks as needed. Immediately report any problems to a supervisor. Supervisors should consider scheduling the most work for the coolest part of the day, assigning extra employees to high demand tasks that will require longer periods in hot areas. All employees should watch out for the safety of their coworkers.
- Potable Drinking Water Employees should bring adequate potable drinking water. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity throughout the work shift. Percheron employees shall have access to potable drinking water.

- Drinking Liquids Drink plenty of clear liquids (water or fluid containing electrolytes) and avoiding caffeine and alcohol. It is easy to become dehydrated in hot weather. If your urine output decreases drink more fluids. Employees that sweat a lot should drink extra water.
- Protective Clothing Be aware that protective clothing or personal protective equipment may increase the risk of heat stress. Wear lightweight, light-colored, loose-fitting clothing in hot weather so your skin can cool through evaporation. Wear a wide-brimmed hat to shade yourself in hot, sunny weather.
- Shade Protection Where natural shade does not exist; shade shall be provided as necessary for Percheron employees.
- Buddy System Percheron will us the "Buddy System" to ensure that no employee is working alone in hot work environments. By working in pairs employees can monitor each other and watch for signs of heat stress. Immediately report to your supervisor the symptoms or signs of heat related illness.
- Maintaining Energy Levels: Hot temperatures can cause fatigue more rapidly since energy is needed to cool your body. Take frequent breaks, drink plenty of hydrating fluids, and eat light and cool meals such as fruits and vegetables to replace lost nutrients.
- Feeling Early Effects of Heat If you feel nauseated, dizzy, or weak in a hot environment, sit or lie down quickly to decrease the chance of fainting. If possible, move to a location that is either shaded, has good ventilation, has an air conditioner or fan to help cool off. You can cool your skin by spraying water over your body.

When job site conditions exceed 95 °F, the following procedures should be followed to ensure employee safety:

- Effective communication by voice, observation or electronic means.
- Observation of employees for alertness and signs/symptoms of heat illness.
- Designating one or more employees on each worksite as authorized to call for emergency medical services.
- Reminding employees to drink water throughout the shift.
- Conduct an assessment at the project conception, throughout the life of the project, and prior to
 changing weather conditions, to identify the types of jobs and employees that are at risk for heat
 related illnesses and injuries. Daily JSA meetings shall be conducted before beginning work to
 review the high heat procedures, encourage drinking water and remind employees of their right
 to take a cool-down rest when necessary.
- Identification of the key physical/personal factor prior to performing a task that plays a role in the contribution of heat-related illness.
 - High physical exertion jobs
 - Level of physical activity and duration
 - Clothing color, weight, and breathability
 - Age of employee
 - Weight/ fitness of employee
 - Drug use /alcohol use of employee that or the previous day
- Heat prevention procedures shall be in writing and made available to employees.
- All Percheron employees with supervision responsibilities shall be trained to recognize the symptoms of heat stress/illness, mitigation of potential hazards of heat prior to supervising employees in these environments.

- Supervisors must be current in Heat-Related Illness training prior to performing a high-heat related job.
- Supervisors will review the heat illness and emergency response procedures to prevent heat illness with work crews and to observe and recognize if any employee exhibits symptoms consistent with possible heat illness.
- Supervisors shall ensure all employees have received Heat-Related Illness Awareness training
 prior to working in such conditions. Annual training regarding the health effects of heat exposure,
 proper cooling procedures, recognition and first aid for heat stroke and heat exhaustion, required
 protective clothing, proper use of cooling shelters, the buddy system, vehicle breakdown
 procedures, and proper eating and drinking habits for working in the heat.

HEAT AND COLD STRESS EQUATIONS

June 19, 2018





ENVIRONMENTAL POLICY

SPILL PREVENTION

A hazardous spill is defined as the uncontrolled release of a hazardous chemical, oil, or biological material, either as a solid, liquid or a gas. Spills of any amount can be hazardous and polluting and should be prevented. This program outlines the procedures to help avoid spills and minimize the impact of an accidental spill.

Following the proper procedures for storing, transferring, handling, using, and properly disposing of hazardous materials are pivotal in prevention of accidental releases.

- Areas where chemicals may be used or stored must be maintained using good housekeeping and best management practices.
- A dedicated area for the storage of hazardous substances will be clearly identified, maintained and well organized.
- All hazardous substances shall be kept in the original container that closes and seals properly.
- Container labels will be legible, the required information includes the chemical name, hazards, and manufacturer. If labeling becomes illegible, then the container must be re-labeled with the same information.
- Hazardous substances will be stored so that they have limited exposure to storm water and in a secondary containment when necessary.
- If Hazardous substances are stored, they will be inspected monthly to ensure there are no leaking or deteriorating containers.
- Should Percheron employees be required to transport small amounts of hazardous substances, employees will ensure that the correct container(s) are sealed properly and secured from moving.
- A spill tray may be used to prevent uncontained leaking/spilling depending on the type and quantity of the hazardous substance.
- Percheron employees are not permitted to transport large amounts of hazardous substances without proper training.
- Employees using or handling hazardous substances will review the manufacturer's instructions and must wear the proper personal protective equipment (PPE) to minimize the chance of injury.

When appropriate, a proper spill kit should be made available and must contain adequate supplies for hazardous substances that may be spilled. These kits will include PPE, absorbent materials and paper towels, and special cleaning equipment. All company owned or leased vehicles must have a spill kit.

Spill Response Procedures

In the event of an accidental hazardous substance spill, the following response procedures should be followed:

- Remain calm and notify others working around the hazard.
- Remain upwind of the spill.
- If it is safe to do, identify the source and stop the leak or spill.
- Eliminate heat or ignition sources from the path of the spill, including engines.
- Notify your supervisor.

- Contact the HSE and Project Manager and they will inform you on the necessary steps through cleanup and any required documentation. Refer to the Emergency Contact List.
- If it is safe to do so and you know what the material is, control the spill from spreading to other areas to minimize injury and/or property damage. Using spill kit contents such as absorbent material or a neutralizer may help in preventing the spill from spreading to floor drains or other places that may allow the hazardous substance to flow into environmentally sensitive areas. Prior to containing any type of spill, employees should wear the proper PPE.
- If needed, call 911 for help. The dispatcher should be provided with information regarding the type of hazardous substance spilled and the quantity to prepare first responders.
- Properly dispose of the spill cleanup material and contaminated contents according to the local laws and environmental regulations.
- Depending on the type of hazardous substance and quantity spilled, the HSE Manager will notify the appropriate state and federal organizations and/or client according to the site-specific emergency procedures.
- Documentation of who and when the notifications were made will be kept.
- All incidents pertaining to spills will be reported to the client in accordance with their procedures.
- Monitoring may be performed to document the removal of all spilled materials.
- The Reportable Quantities (RQ) Chart in the record keeping section of this policy identifies quantities that must be reported.

Training

All affected employees and first responder personnel at the operations level will be trained in the contents of the Percheron Environmental Policy and the site-specific spill prevention and response plan prior to working with or around hazardous chemicals/materials. First responder personnel are responsible for responding to releases or potential releases of hazardous substances for the specific purpose of protecting persons, the environment and property. Re-training shall occur annually and when new hazardous chemicals/materials are introduced, periodically throughout the duration of the job or if it becomes known that an employee requires additional training.

Topics of this training will include:

- Site-specific hazardous chemical/material(s) list and SDS location
- The hazardous substances covered in the site-specific plan
- Proper Emergency response procedures for spilled hazardous substances
- Location of the spill kit and PPE
- Communication procedures
- Waste storage and disposal
- Safe Distance
- Responding Defensively

Record Keeping

In the event of a release of hazardous substance or oil equal to or exceeding the Reportable Quantity (RQ) threshold by state or federal regulations, the HSE Manager or company designated employee will report the release to the appropriate authority. This may include the National Response Center (NRC) at (800) 424-8802, the State Emergency Response Center (SERC) at (800) 832-8224, and the Local Emergency Planning Committee or fire department. If the spill or discharge creates an imminent health threat it will be verbally reported within a 24-hour period.
Facilities located in Texas are required to report a spill in quantity equal to or greater than the RQ in any 24-hour period. The following provides the RQ for hazardous substances and oil-containing materials:

Kind of Spill	Where Discharged	Reportable Quantity	Rule, Statute, or Responsible Agency
	onto land	"Final RQ" in Table 302.4 in 40 CFR 302.4	- 30 TAC 327
	into water	"Final RQ" or 100 lbs whichever is less	
Any Oil	Coastal Waters	as required by the Texas General Land Office	Texas General Land Office
Crude Oil, oil that is neither a petroleum product nor used oil	onto land	210 gallons (five barrels)	- 30 TAC 327
	into water	enough to create a sheen	
Petroleum product, used oil	onto land, from an exempt PST facility	210 gallons (five barrels)	
	onto land, or from a non- exempt PST facility	25 gallons	30 TAC 327
	directly into water	enough to create a sheen	
Associated with exploration, development and production of oil and gas, or geothermal resources	under the jurisdiction of the Railroad Commission of Texas	as required by the Railroad Commission of Texas	Railroad Commission of Texas
Industrial solid waste or other substances	into water	100 lbs	30 TAC 327
From petroleum storage tanks, underground or aboveground	into water	enough to create a sheen	30 TAC 327
From petroleum storage tanks, underground or aboveground	onto land	25 gallons or equal to the RQ under 40 CFR 302	30 TAC 327
Other substances that may be useful or valuable and are not ordinarily considered to be waste, but will cause pollution if discharged into water in the state	into water	100 lbs	30 TAC 327

Environmental Protection Agency & The State of Texas Recordable Quantities (RQ) Chart

All releases above their respective RQ will be recorded as a spill in this section of the plan on the Percheron Incident Report Form and the Accidental Release Form located in the appendix of this document. The project stakeholders will be notified of the known incident details. Information recorded must include the date and location of the release, material(s) involved, quantity of the release, source and cause of the release, and the clean-up response.

HAZARDOUS WASTE OPERATIONS

The objective of this policy is to reduce and maintain exposure limits within proper thresholds along with proper care and management of the surrounding environment. All work performed will be to industry standards with respect to best practices related to performed work.

This program describes:

- The approach for managing wastes generated during project activities.
- The approach for any field investigations performed by Percheron, LLC.
- The process to identify, evaluate, handle and dispose of wastes generated and control safety and health hazards.
- Provide for emergency response (chain of command in an emergency).
- Respond to hazards related to hazardous waste operations.
- Use of engineering controls
- Work Practices to minimize exposure and contamination in all avenues.
- Personal Protective Equipment
- Address tasks and objectives of the operations.
- Site Specific Procedures.

Emergency Response: Call 911, Axiom, 24-hour Percheron Safety Hotline, notify your supervisor, and notify HSE. All emergency numbers and contacts are located in the Emergency Telephone Numbers Section of the Safety Manual.

Controls:

<u>Engineering</u>: The appropriate engineering controls will be implemented based on the on-site known hazards; examples may include but are not limited to the following:

- Use of pressurized cabs or control booths on equipment, and/or the use of remotely operated material handling equipment.
- Air monitoring used to identify and quantify airborne levels of hazardous substances. The monitoring will address initial entry, periodic monitoring, possible IDLH conditions and wherever exposure may be a possibility.

<u>Administrative</u>: The appropriate administrative controls will be implemented based on the onsite known hazards; examples may include but are not limited to the following:

- Training
- Job Hazard Analysis (JHA) will be performed prior to the beginning of any project.
- Job Safety Analysis (JSA) will be performed daily by the onsite staff.

<u>Personal Protective Equipment (PPE)</u>: The appropriate personal protective equipment will be provided for protection from on-site known hazardous materials. Contaminated PPE will not be removed from appropriate storage on-site. PPE examples may include but are not limited to:

- Supplied Air Respirators
- Level A-D PPE

Responsibilities

The required minimum waste management responsibilities include the following:

• Pre-transport requirements (packaging, marking, labeling, storing, and placarding of hazardous and non-hazardous wastes before shipment),

- Conducting routine waste characterizations;
- Completing waste tracking forms and waste tracking logs;
- Drum/container inspections for stored wastes;
- Inventory of accumulated waste;
- Preparing transportation manifests; and
- Shipment of wastes within regulated accumulation times.

If there are any questions concerning the RCRA or DOT requirements, the hotlines for each may be contacted. The number for the RCRA hotline is 1-800-424-9346 and the number for the DOT hotline is 1-800-467-4922. Hazardous wastes will be sent to a permitted TSD facility. Upon any changes in waste streams or procedures, this document will be updated and kept current.

Hazardous Waste Generator Status

The Federal RCRA identifies three categories for generators of hazardous waste: large quantity generators, small quantity generators, and conditionally exempt generators.

Percheron is a non-generating hazardous material company, however, below is a list of the different generator types and minimum generation for their classification.

GENERATOR STATUS	GENERATIO N	ACCUMULATION TIM E	MAXIMUM ACCUMULATION (at any one time)	SATELLITE: ACCUMULATI ON QUANTITY LIMITS (at the point of generation)
Large Quantity	>2,200 lb./month	90 days	NA	Up to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste
Small Quantity	>220 lb./month but <2,200 lb./month	180 days	13,200 lb.	Up to 55 gallons of hazardous waste, or 1 quart of acutely hazardous waste
Conditiona lly Exempt	<220 lb./month	NA	2,200 lb.	NA

Waste Characterization

Because of the possibility that hazardous wastes, as defined by the Resource Conservation and Recovery Act (RCRA) may be generated, all wastes must be properly characterized to ensure proper management and disposal practices. The management of operations and maintenance (O&M) or investigation derived waste at a job site begins with the identification of the waste streams present. Identification procedures must be followed when:

- A new waste stream is introduced;
- There is a change in an operation that generates waste; or
- When updating current waste streams.

To characterize a new waste stream, it must be determined whether the waste is hazardous or non-hazardous. To do this, one or more of the following may be used:

- Knowledge of the process generating the waste;
- Use of existing published or documented data on the waste or on waste generated in similar processes;
- Information obtained in safety data sheets (SDS); or
- Analysis of the RCRA characteristics.

Targeted analysis will be performed to determine the correct means of disposal.

Hazardous Waste

To be hazardous waste, a waste must first meet the definition of a solid waste. The term "solid waste" means any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges which are point sources subject to permits under section 1342 of title 33, or source, special nuclear, or byproduct material as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 923) [42 U.S.C. 2011 et seq.]. The solid waste can be identified as a hazardous waste if it exhibits certain characteristics or by being listed as a hazardous waste in the regulations (40 CFR 261). A characteristic waste can be determined by analysis for ignitability, corrosivity, reactivity and toxicity.

A waste that is not considered a characteristic waste can still be hazardous if it is a listed waste. A listed waste can fall under four categories published by the EPA in 40 CFR 261.31-33. No chemical tests are needed to determine if wastes are listed. Chemicals in the waste stream will be compared to chemicals listed. The four lists are:

- Wastes from non-specific sources;
- Wastes from specific sources;
- Certain discarded products; and
- Acutely hazardous discarded products

The proper method for disposal needs to be determined if waste is categorized as hazardous. The generated wastes have the possibility of containing a variety of hazardous and non-hazardous constituents.

Universal Wastes

The Universal Waste Rule was implemented to streamline regulations on waste generated in small quantities by a wide range of industries. Universal Wastes are items commonly thrown away by households and small businesses. Although handlers of universal wastes can meet less stringent standards for storing, transporting and collecting these wastes, handlers must still comply with the full hazardous waste requirements for final recycling, treatment, or disposal. Universal wastes include batteries, agricultural pesticides, thermostats and lamps.

Non-Hazardous Wastes

Non-hazardous wastes are not regulated under the EPA Hazardous Waste Rule (RCRA) or the Universal Waste Rule. State environmental regulations typically govern the generation, transport and disposal of

non-hazardous waste. Refer to state requirements for guidance for management of these types of wastes.

Waste Labeling

Containers used for satellite accumulation must be properly labeled (i.e. "Hazardous Waste or "Special Waste") with the name of the waste material. In the case where a drum is pending analysis for characterization, a label stating such, along with the date and contents of the drum will be clearly filled out and placed on the drum. To ensure that the drum is compliant with regulations, labels will be filled out in accordance with DOT regulations under 49 CFR 172.

Waste Storage

Hazardous Waste Storage

Responsibilities related to accumulating hazardous waste on site include safe storage, accurate signing and labeling, prevention of accidents, and responding to emergencies in accordance with federal regulations. Wastes may be in a satellite area located at or near the point of generation. These containers must be located away from routine traffic, floor drains, regular trash cans, and secured against any other potential releases. The total amount of hazardous waste that may be accumulated at a satellite area is 55 gallons per waste stream or one quart of acutely hazardous waste. After this amount has been reached, the waste must be transported within three days to the job's site's designated storage area, where it may be stored for either 90 or 180 days, depending on the volume of hazardous waste generated.

The location of a designated hazardous waste storage must be determined by qualified personnel. Similar to satellite accumulation locations, waste storage area must be located away from routine traffic, floor drains, regular trash cans, and secured against any other potential releases. Proximity to transportation facilities should be considered when selecting storage areas.

Hazardous waste generated from Operations, Maintenance and field investigation test samples if obtained will be stored in appropriate containers: such as DOT 55-gallon drums to meet EPA requirements. The requirements for containers are:

- Containers must be labeled appropriately with the date that the waste was generated;
- Containers must be made of or lined with a material that is compatible with the waste to be stored;
- Containers must remain closed during storage, except when adding or removing waste. The containers must not be handled or stored in a manner which might cause them to rupture, leak, or fail;
- Areas where containers are stored must be inspected weekly for leaks and/or deterioration;
- Containers must be kept in good condition, or else the waste must be transferred to another container; and
- Incompatible wastes must not be mixed to prevent certain hazards.

Non-Hazardous Waste Storage

Responsibilities for the storage of non-hazardous waste are similar to that of hazardous material with respect to the safe storage, accurate signing and labeling, prevention of accidents, and responding to emergencies in accordance with federal regulations. The waste will be accumulated in areas near the point of generation and all containers will be properly labeled and dated. Non-hazardous waste may be stored in containers meeting requirements stated in the above section, "Hazardous Waste Storage", but may also be stored in tanks depending on state regulatory requirements.

Waste Transportation

Percheron, LLC will not transport or dispose of any regulated waste. The client is the owner of all waste generated on their site. Percheron, LLC may assist the owner in the manifesting and disposal process but will not take possession of the waste nor sign the manifest as the generator, generators agent or as a transporter of the waste.

Hazardous waste should only be shipped off site to a permitted disposal facility licensed transporter. The waste will only be transported to a facility that is authorized to handle the waste under a state program, and if applicable, under the Federal hazardous waste regulatory program. Manifests will be kept as a record of all hazardous waste transported off site. A non-hazardous waste transporter manifest/bill of lading will accompany all non-hazardous waste shipped off site.

The EPA's Uniform Hazardous Waste Manifest may be prepared by designated personnel to document the transport of hazardous waste for off-site treatment, recycling, storage or disposal.

Percheron shall comply with the DOT regulatory requirements regarding Hazardous Materials, quantities and containers used for transportation.

Designated personnel will obtain the waste transporters decal number before the waste is transported. Test results, waste analysis and other determinations made will also be kept on file for a period of at least ten years from the date the waste was last sent to on-site or off-site disposal.

Recordkeeping and Reporting

A hazardous and non-hazardous waste manifests will be prepared, retained and will accompany all waste shipped off site. A signed copy will be obtained from the designated TSDF within 30 days of shipment. Manifests will be kept as a record of all hazardous waste transported off site. The operator will fill out a waste tracking form and a log will be maintained by off-site Percheron, LLC personnel to keep a full record of all waste generated when applicable. Also, copies of all test results, waste analysis, and other determinations made will be kept on site for a period of at least ten years from the date the waste was last sent to on-site or off-site disposal. Copies of all reports filed with the EPA will also be kept for at least ten years from the date of the report. State regulatory reporting requirements could also apply.

When applicable daily inspections during regular business days of all containers of hazardous waste, including containers at satellite accumulation areas, shall be made and recorded in a logbook which shall be kept at the facility. All containers with non-hazardous waste will be inspected on a weekly basis in the same manner described above. Inspections will be recorded on a field logbook or using a specific waste inspection form generated by personnel. The inspection logbook for both types of waste will contain the name of the personnel conducting the inspection, the time and date of the inspection, and the conclusions of each inspection.

Percheron shall comply with the governing organizations reporting and management of any related environmental issues. The following are federal statutes and their release reporting requirements. State and local governments may have additional requirements.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

Any release of hazardous substances and RQs that are listed in 40 CFR 302.4 will be reported to the National Response Center (NRC) immediately in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requirements.

Emergency Planning and Community Right-to-Know Act (EPCRA)

Any extremely hazardous substance listed in 40 CFR 355 or a CERCLA hazardous substance, equal to or greater than its RQ, shall be reported if it results in exposure to people outside of the facility boundary as required by the Emergency Planning and Community Right-to-Know Act (EPCRA). If applicable, Percheron will report the release to the NRC.

Resource Conservation and Recovery Act (RCRA)

A RCRA hazardous waste release will result in notification of the EPA regional office and a submitted written follow-up report. The 40 CFR 265 Subparts C & D covering contingency planning and emergency procedures will be determined by location where applicable.

Clean Water Act (CWA)

Reportable quantities of hazardous substances of those stated in 40 CFR 117 will be reported in accordance to section 311 of the Clean Water Act (CWA). Reportable scenarios would include a spill that has resulted in:

- a film, sheen, or discoloration of the water or adjoining shoreline.
- a sludge or an emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

Toxic Substances and Control Act (TSCA)

The NRC shall be contacted immediately if any spill containing polychlorinated biphenyls (PBCs) by concentration of 50ppm or any spill that contains 10 pounds or more by weight of PCBs, and has affected the stated areas according to the regulation under the Toxic Substances and Control Act (TSCA).

Hazardous Materials Transportation Act (HMTA)

If a qualifying incident occurs, Percheron shall report to the NRC as required by the Hazardous Materials Transportation Act (HMTA) under the Department of Transportation (DOT).

OSHA

In response to the release of hazardous substances where potential employee exposure occurred, Percheron shall report the incident within 24-hours to the nearest OSHA area director.

The appropriate incident report will be filed with OSHA within 15 calendar days.

Release reporting requirements under OSHA can be found in 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER).

In the event of a discharge or spill, the Percheron Discharge and Spill Form must be completed and can be found in Appendix A of the Safety Manual.

Training Requirements

Equipment operators, general laborers, supervisors and management, etc., must be trained prior to being allowed to participate in or supervise field activities. The training shall cover:

- The use of personal protective equipment.
- Work practices which minimize hazardous risks and safe use of engineering controls and equipment.

Prior to going on site where there is a potential for exposure to hazardous materials, employees will have reviewed the company environmental policy along with the associated safe work plan.

Decontamination Procedures

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 or designated responsible party to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies. Decontaminated employees or equipment to contaminated employees or equipment. PPE and equipment shall be decontaminated, cleaned, laundered, maintained or replaced as needed to retain 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. 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 1910.120.

Medical Surveillance

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 will be provided medical surveillance at no cost to the employee.

WASTE MANAGEMENT

The purpose of this program is to provide guidance and requirements necessary for efficient, effective and compliance with the Environmental Protection Agency (EPA) compliance under the Universal Waste Management, found at 40 CFR 273. Percheron is committed to implementing and delivering good waste management practices during projects and operations by setting up procedures to properly handle wastes. This program applies to all Percheron and/or client locations where employees may be working and is intended to minimize the hazards to human health or the environment from improper disposal of these wastes in landfills.

Waste is defined as any material, substance, or byproduct eliminated or discarded as no longer useful or required after the completion of a process whether it be office based or on location. An essential part of implementing waste management, is acquiring the ability to recognize and reduce as much waste as possible within a process or operation. Percheron LLC's procedures are based on the principle that the minimum amount of waste should be produced. Where materials are no longer required, the options listed below should be followed in the stated order:

- **Reduce:** Avoid, in general, the need to throw away materials. When purchasing consider asking suppliers to take back unnecessary packaging and any reusable items
- **Re-Use:** Before discarding an item, determine if another person, department, or organization could use it. Examples of things that might be reused include, clothing, books, equipment, and furniture.
- **Recycle:** Percheron will encourage proper waste segregation in order to recycle as much as possible. Wastes should be recycled whenever practical as the collection of recycled material will reduce the total load on the environment.
- **Disposal:** When unwanted materials cannot be re-used or recycled, they are disposed of as "general waste". Percheron, LLC is committed to ensuring that wasted management contractors utilized comply with the EPA.

Waste Management Determination:

The Waste Management Matrix below will be used at all Percheron locations and address the following:

- 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.

When necessary Percheron management will coordinate with the project site or owner/client to ensure proper disposal of wastes, whether wastes will be taken off site by Percheron or will be disposed of on the owner client's site.

Waste Management Matrix

Waste Name	Description	Activity Generating Waste	Hazardous/ Non- Hazardous	Reduction/Recycling	Disposal Method
Aerosol Can (empty)	Spert aerosol cans: • Aerosol cans used in crew quarters are considered domestic trash. • Aerosol cans used in industrial application must be emptied, and then recycled as scrap metal. • Aerosol cans which contained a hazardous waste are considered empty when the pressure in the container approaches atmospheric 40 CFR 261.7 (b) (2) • If the can contains a hazardous waste and is not empty it is considered a State and Federally regulated hazardous waste	Painting, Lubricants, Cleaning	N on Hazardous	Use all of contents. Order only the quantity needed. Emptied cans may be recycled as scrap metal.	If empty: Ship to approved scrap metal recyclor. If empty: may be placed intrash destined for a landfill. If not empty: contact Health, Safety & Environment Department and provide a SDS.
Aerosol Cans (Containing Engine Starting Fluid, WD- 40, Liquid Wrench, Brake Cleaner and Spray Paint)	A dispenser that holds a substance under pressure and that can release it as a fine spray (usually by means of a propellant gas) aerosol container, spray can.	Painting, Lubricants, Cleaning	Hazardous	Use all of contents. Order only the quantity needed. Emptied cans may be recycled as scrap metal.	If empty: Ship to approved scrap metal recycler. If empty: may be placed in trash destined for a landfill. If not empty: contact Health, Safety & Environment Department and provide a SDS.
Batteries (Dry)	Consumer goods batteries used in: • Flashlights • Portable equipment A dry electric storage battery is excepted from all requirements of the DOT.	Battery Failures	Universal Waste - Non- Hazardous	Use Rechargable batteries. Recycle.	Place in trash or allow to be placed in a landfill.
Batteries (Lead Acid)	Liquid-filled or gel-filled leadacid batteries. Used in vehicle engine starting and uninterrupted power supply systems.	Battery Failures	Universal Waste - If Recycled	Recycle. Arrange for battery oxchange or credit from dealer. Special standards exist (that are more lenient than hazardous waste standards) for the storage, shipping and recycling of these wastes only if you recycle.	Send to approved recycler. Do not place in trash or allow to be placed in landfill.
Cardboard/Office Paper	Paste board or stiff paper, material manufactured inthinsheets from the pulp of wood or other fibrous substances, used for writing, drawing, or printing on, or as wrapping material.	Shipping Boxes/Office Activities	Universal Waste - Non- Hazardous	Only print on paper when necessary. Use front and back of the paper. Where feasable paper and cardbo ard boxes should be recycled.	Place paper in recycling bin. Band cardboard boxes together for recycling.
Computers/Electronics Discarded	Circuits or devices using transistors, microchips, and other components.	Replacement	Universal Waste - Non- Hazardous	Use a computer recycling or disposal film. Salvage any us able parts before disposal.	Use a computer recycling or disposal firm.
General Waste	Material must be free of any actual or apparent contamination (pathological/infectious, radioactive and/ or hazardous chemical).	Waste which is neither recyclable nor hazardous. This waste will be collected by the cleaning staff at arranged intervals from containers around the building.	Universal Waste-Non- Hazardous	Reduce the amount of waste generated.	This waste will be collected by the cleaning staff at arranged intervals from containers around the building.
Toner/link Cartridges	A black or colored powder used in xerographic copying processes.	Copiers, printers, fax machines	Universal Waste-Non- Hazardous	Reduce the amount of to ner/ink cartridges by printing only when neces sary.	If cartridges cannot be recycled, dispose in the appropriate trash container.
Wood Waste	Solid waste consisting of wood pieces or particles generated as a by-product or waste from the manufacturing of wood products, construction, demolition, handling and storage of raw materials, trees and stumps.	Various activities/ Shipping Pallets	Universal Waste-Non- Hazardous	Minimize use of wood pallets. Contact supplier to determine if they will pick up the pallets for reuse.	If cartridges cannot be recycled, dispose in the appropriate trash container.

Percheron employees will estimate the waste, trash and/or scrap that will be generated so that the proper containment can be made available for use.

Training:

Employees shall be instructed on managing waste generated at the work site and on the proper disposal method of wastes. Examples include:

- Instruction on the proper handling, storage and disposal of wastes and depending on the waste generated at the site to also include general instruction on disposal of non-hazardous wastes, trash or scrap materials.
- If wastes generated are classified as hazardous then employees shall be trained to ensure proper disposal and compliance with regulations.
- Minimization methods to reduce waste.
- Recycling methods and proper PPE to be utilized.

NATURALLY OCCURING RADIOACTIVE MATERIAL (NORM)

Program Administration

Radioactive forms of elements are called radionuclides. Some occur naturally in the environment, while others are man-made, either deliberately or as byproducts of nuclear reactions. Every radionuclide emits radiation at its own specific rate, which is measured in terms of half-life. Radioactive half-life is the time required for half of the radioactive atoms present to decay. Radioactive decay is when a radioisotope transforms into another radioisotope; this process emits radiation in some form. Some radionuclides have half-lives of mere seconds, but others have half-lives of millions of years. The Naturally Occurring Radioactive material is administered by Percheron's Managing Partner, Safety and Integrated Services, Justin Lyon.

The three main naturally occurring Radionuclides include: primordial, secondary and cosmogenic radionuclides. These include Gamma, Alpha and Beta Radiation.

Hazardous Locations and Areas

Technologically enhanced naturally occurring radioactive materials (TENORM) can be created when industrial processes are performed with materials that contain NORM. Groundwater that coexists with oil can have unusually high concentrations of NORM. Oil Field Drilling sites are an area of concern along with oil field equipment. Areas of risk include non-destructive testing, equipment storage that has known NORM and contaminated sludge.

Exposure & Testing

All employees who work in a suspected area of NORM should not be exposed to more than 25 millirems in any period of seven consecutive days. If an employee is working in a suspected or known area that contains NORMs then the appropriate devices will be utilized to verify an exposure risk. These monitoring tools consist of:

- Pocket Dosimeter
- Pocket Chambers
- Film Badges
- Film Rings

Field Supervisors shall verify the obtained information from Project Managers regarding presence of TENORM or NORM in their workplaces.

If TENORM or NORMs are suspected the HSE Department is to be notified immediately to develop an action plan for employee protection. The methods used will be time, distance and shielding.

If an employee is suspect of being exposed to radioactive material, Percheron will pay for the medical testing required.

Employees will not be exposed to a dose > 5 rems per calendar year.

Record Keeping

All employees medical testing records will be retained at a minimum for the duration of employment plus 30 years.

NOISE AWARENESS

January 31, 2016

All Percheron employees who are exposed to a noise action level or work in high noise areas will be provided noise awareness training. This training shall be repeated annually for each employee. Training shall include the proper techniques of wearing hearing protection be updated consistent to changes in PPE and work processes.

Hearing protectors shall be available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to the employees. Hearing protectors shall be replaced as necessary. Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by the employer. Hearing protection shall be worn by any employee that has been provided hearing protection by their employer. Employees will wear hearing protection in signed areas while at a host facility. Hearing protection is considered standard PPE for all Percheron employees and should be utilized if at any time the employee is working in an area with noise levels of 85 decibels or higher.

NOISE EXPOSURE/HEARING CONSERVATION

January 27, 2020

The purpose of this procedure is to protect the hearing of employees from damage caused by exposure to occupational noise.

Responsibility

Supervisors shall:

- Strictly enforce the use of hearing protection.
- Post warning signs in high noise areas.

Management shall:

- Use Engineering and Administrative controls to limit employee exposure.
- Provide adequate hearing protection for employees.
- Conduct annual hearing conservation training for all employees.
- Maintain accurate record of all employee exposure measurements and all records are maintained as required by regulations.

Employees shall:

- Use company provided, approved hearing protection in designated high noise areas.
- Request new hearing protection when needed.
- Exercise proper care of issued hearing protection.

Procedure

A continuing effective hearing conservation program shall be administered when employees are exposed to sound levels greater than 85 dBA on an 8-hour time-weighted average basis. When information indicates that employee exposure may equal/exceed the 8-hour time-weighted average of 85 dBA, a monitoring program shall be implemented to identify employees to be included in the hearing conservation program.

All employees whose exposure equals or exceeds an eight-hour time weighted average of 85 dBA will receive a baseline audiogram at no cost to the employee. This test will be conducted within six months of the employee's first exposure at or above the action level. Before testing, the employee must have at least 14 hours without exposure to workplace noise. Hearing protection may be used to meet this requirement. Monitoring shall be repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that: Additional employees may be exposed at or above the action level or the attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the minimum level of requirements for hearing protectors.

All employees exposed at or above an eight-hour time weighted average of 85 dBA shall receive an annual audiogram. This audiogram will be compared to the baseline test to determine if the employee has had a standard threshold shift. If a threshold shift has occurred, the employee shall be notified, in writing, of the results within 21 days of the determination. In the event of an employee threshold shift, the hearing protection being used shall be reviewed and modified if necessary and a medical evaluation may be required. All test and exposure records shall be maintained as required by state and federal regulations.

Hearing Protection

- Hearing protector attenuation shall be evaluated for the specific noise environments in which the protector will be used.
- Appropriate hearing protection is provided at no cost to the employee and MUST be worn by all personnel in areas where signs are posted warning of excessive noise levels.
- Employees not using hearing protection shall be fitted with hearing protectors, trained in their use and care, and required to use them. Employees already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary.
- Hearing protection should also be worn in un-posted areas where temporary excessive noise may exist.
- Radios and headsets are not allowed on the work site unless being used for work related communications.
- If ear plugs cannot be worn by an employee for medical reasons, a written excuse, signed by a medical doctor must be furnished. Another type of hearing protection will be provided.
- Hearing protection shall be required at locations where personnel are exposed to noise at or above 85 dBA averaged over an eight-hour work period. These locations will be identified by the safety department and employees working in these areas are required to wear the appropriate hearing protection.
- Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by the employer.

Training

A training program shall be provided initially for all employees who are exposed to a noise action level or work in high noise areas. The training shall be repeated annually for each employee. Re-training shall be provided consistent to changes in PPE and work processes to include the proper techniques of wearing hearing protection.

Records

At a minimum, Percheron will retain accurate records of all employee exposure measurements and audiometric testing for the duration of an employee's employment.

The purpose of this program is to prevent Percheron employees from being exposed to airborne hazards during routine and non-routine job tasks as well as during emergency situations. Percheron shall provide a respirator to each employee when necessary to protect the employees' health.

Supervisors of employees, with support from the Percheron HSE Department, will determine if a respirator is required based on the employee's potential exposure to respiratory hazards. Appropriate respirators shall be selected and provided based on the respiratory hazards to which workers are exposed and workplace and user factors that affect respirator performance and reliability. Employees are required to use NIOSH-certified respirators only. The respirator shall be used in compliance with the conditions of its certification. Employees who are required to wear respirators during normal work operations and during certain non-routine or emergency situations must adhere to the Percheron Respiratory Protection Program.

The following elements are required:

- Fit testing and medical evaluations
- Proper respirator use in routine and foreseeable emergencies.
- Ensuring adequate air quality, quantity and flow for air supplied respirators.
- Cleaning, disinfecting, storing, inspecting, repairing, removing from service or discarding, and otherwise maintaining respirators with schedules for implementation.
- Regularly evaluating the effectiveness of the program.
- Training for employees and responsible supervisors i

Medical Evaluation

A medical evaluation may be required to determine the employee's ability to use a respirator before he/she is fit tested or required to use the respirator. If a medical evaluation is required the HSE Department will identify a physician or other licensed health care professional to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire.

Fit Testing

Employees using a tight-fitting facepiece respirator must pass an appropriate qualitative or quantitative fit test. The employee's supervisor shall ensure that an employee using a tight-fitting facepiece respirator is fit tested prior to initial use of the respirator, whenever a different respirator facepiece (size, style, model or make) is used, and at least annually thereafter. The HSE Department will identify a clinic to perform fit tests.

Fit of Respirator

Tight-fitting facepieces may not be used by employees who have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function or any condition that interferes with the face-to-facepiece seal or valve function.

Immediately Dangerous to Life or Health (IDLH) Atmospheres

Percheron shall provide the following respirators for employee use in IDLH atmospheres: A full-face piece pressure demand SCBA certified by NIOSH for a minimum service life of thirty minutes, or a combination full-face piece pressure demand supplied-air respirator (SAR) with an auxiliary self-contained air supply.

Cleaning and Disinfecting

All respirators shall be cleaned and disinfected per the manufacturer requirements as follows:

- Permanently Assigned Respirators: Those respirators assigned to an employee for his or her exclusive use shall be cleaned and disinfected as needed, but no less than weekly.
- Temporary or Emergency Assigned Respirator: Those respirators assigned on an emergency or temporary basis shall be cleaned and disinfected after each use and prior to each reassignment to another employee.

Cleaning and Disinfecting Respirators:

Employees shall be provided with respirators that are clean, sanitary and in good working order. Respirators shall be cleaned and disinfected as often as necessary to be maintained in a sanitary condition.

Inspections and Repair

All respirators used under permanent or temporary assignment shall be inspected prior to each donning by the assigned employee. The employee shall be responsible for inspection of the following points: The straps, cartridges, and filters.

- A proper face seal.
- Testing proper function of the exhaust and inlet valves.
- Testing of air hose connections or blower.
- Inspection of the lens.

Emergency assigned respirators shall be inspected at least monthly. The employee's supervisor may require inspections that are more frequent. Defective respirators should be removed from service and marked until serviced by a trained individual. If a respirator cannot be rapidly repaired, an interim or new respirator shall be assigned.

Storage

All respirators shall be stored in a clean, contaminant free environment to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals. The respirator/face piece shall be packed or stored to prevent contaminant exposure or deformation of the facepiece and exhalation valve. Whenever possible, respiratory protection should be stored in a secured area.

Training

Employees who are required to use respirators shall be trained prior to using a respirator in the workplace. Retraining shall be administered annually, and when 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.

PLANT AND ANIMAL SAFETY

February 4, 2013

There are a number of dangerous and/or poisonous plants, insects, reptiles, animals, and other species that are unique to each region of the United States. Field personnel should be aware of these species and know what to do in case of contact with them. The following are some of the species for your particular region (this list is not meant to be all-inclusive).

ANIMALS

A. BIRDS – ALL TYPES

Birds with strong beaks can inflict a painful wound resulting in injury or infection. All bites from birds are non-toxic.

B. TURTLES AND LIZARDS

TURTLES

All bites from turtles are non-venomous. Salmonella is found in the feces of turtles. Handling the animals and their contaminated surroundings and not washing hands afterward may cause salmonella infections. Salmonella is not transferred by turtle bites.

GILA MONSTER/LIZARD -

Description: Robust, with a large head and a heavy tail, its body is covered in bead-like scales. Its color is striking in rich black, laced with yellow or pinkish scales. They are described as docile reptiles, not prone to attacking humans, unless significantly agitated.

Habitat: Lives underbrush and rocks

Region: Arizona, New Mexico, Utah, Nevada, and extreme SE California

Symptoms: The bite is described as extremely painful, usually confined to the area of the bite initially. Victims may experience localized swelling, nausea, vomiting, hypertension, weakness, faintness, excessive perspiration, chills, and fever. When bitten it is important to disengage the lizard as soon as possible.

Treatment: First aid in the field should include allowing the wound to bleed freely, irrigating with plenty of water, immobilizing the affected limb at heart level, and keeping injured person calm. All patients with Gila monster bites should be taken to the hospital immediately. The wound should be explored for broken teeth from the Gila monster. It is also important that tetanus immunization is up-to-date and that the patient is observed for signs or symptoms of infection.

C. INSECTS AND OTHERS

ANTS

Description: Reddish brown in color, 1/8 to ¼ of an inch long. Mounds range from 8 to 36 inches high with a diameter of up to four feet. Ants bite first then jab their stingers in the victim's wounds. One ant can produce as many as 20 separate stings.

Habitat: Anywhere

Region: United States

Symptoms: The sting can cause swelling, bruising, and blistering. The pain lasts for about 4-6 hours and may take days to heal.

Treatment: If an allergic reaction occurs, seek medical assistance.

SCORPIONS

Description: Resemble small lobsters with raised, jointed tails bearing a stinger in the tip. Brown or black in moist areas, they may be yellow or light green in the desert. Scorpions feed at night and sometimes hide in boots. Scorpions sting with their tails, causing local pain, possible incapacitation, and even death.

Habitat: Live in deserts and extremely dry areas and forests of tropical, subtropical, warm temperature areas, decaying matter, under debris, logs, and rocks.

Region: Worldwide in temperate, arid, and tropical regions. Scorpions found in Arizona, New Mexico, West Texas, and in Colorado along the Colorado River are the most dangerous.

Symptoms: Stings cause immediate local pain with minimal swelling. Numbness and tingling are frequently reported. The injured area may be hypertensive to touch, pressure, heat, and cold.

Treatment: Healthy, young adults may be managed at home with basic first-aid measures and follow-up, after an initial health facility visit. First-aid should include cleaning the affected area with soap and water, cool compresses, elevation of the affected limb to approximately heart level, and aspirin or Tylenol as needed for minor discomfort. Stings with other symptoms should be seen at a health care facility immediately.

VINEGAROON (WHIP SCORPION)

Description: Often mistaken for a scorpion due to the similar color and size. The vinegaroon does not have a stinger on its tail.

Habitat: Found in decaying matter, under debris, logs, and rocks.

Region: Southern and Southwestern United States

Symptoms: When provoked it will spray a vinegar-like substance that can be irritating to the eyes. **Treatment:** If sprayed, flush eyes with water for 15 minutes to relieve pain. Further medical treatment should be sought if necessary.

CENTIPEDES AND MILLIPEDES

Description: Small and usually harmless with the multi-jointed body up to 30 centimeters long. **Habitat:** Found under bark and stones by day, active at night.

Region: Worldwide

Symptoms: Immediate burning pain, redness, and swelling. The clawed tips of the feet may cause puncture wounds that can become infected.

Treatment: Brush them off in the direction they are traveling if you find them on your skin.

BEES, WASPS, AND HORNETS

Description: Bees are hairy and usually have thick bodies while wasps, hornets, and yellow jackets have slenderer, nearly hairless bodies.

Habitat: They live in colonies, domesticated, or live in caves or hollow trees. Carpenter bees nest in holes in wood, or in the ground like bumblebees. Wasps, hornets, and yellow jackets build nests on stationary objects, that can be almost anywhere. They are found near water in desert areas. **Region:** Worldwide

Treatment: The bee's stinger is barbed, will be frequently left by the stinging bee. The venom sac attached to the stinger may continue to inject venom, even after the bees has flown away. How the stinger is removed is not as important as removing the stinger as quickly as possible. The victim should observe closely the progression of symptoms, especially during the first hour. Mild symptoms may be relieved by taking antihistamines. Should more severe or rapidly progressing symptoms, including breathing difficulties, difficulty swallowing, and/or body-wide itching develop, the employee may require immediate treatment at a healthcare facility. If these symptoms are present, call 911 immediately: breathing difficulties, difficulty swallowing, and/or itching over the entire body.

MOSQUITOES

Description: A two-winged fly.

Habitat: They live in/near water standing water that the mosquitoes use to breed. Found In: United States **Symptoms:** When a mosquito bites, it produces saliva that is irritating when injected into the wound causing pain, redness, swelling, and itching. Frequently a small blister or hive develops at the bite site. Allergy to mosquito bites is common. In addition, bites could lead to transmission of diseases (e.g. West Nile Virus).

Treatment: Wash the bite with soap and water. Put on calamine lotion to help stop the itching. Placing an ice pack on the bite will also help.

TICKS

Description: Small round arachnids with eight legs can have either a soft or hard body, ranging in size from a pinhead to one (1) inch. Ticks require a blood host to survive and reproduce.

Habitat: They live in thick vegetation to which they cling.

Found In: Worldwide

Treatment: Using tweezers, grab the tick as close as you can to your skin, and pull the tick off in one motion. **Don't** cover the tick with petroleum jelly, rubbing alcohol, or fingernail polish, since these do not help make the tick come off, and can make things more complicated. If any of the tick parts are left behind, they should be removed using a sterile needle or pin. In addition, bites could lead to transmission of diseases (e.g. Lyme disease).

LEECHES

Description: Blood-sucking creatures with a worm-like appearance.

Habitat: They live in thick vegetation to which they cling and may also be found swimming in marine and fresh water.

Found In: Tropic or temperate regions

Treatment: Using tweezers, grab the leech as close to you can to your skin, and pull the leech off in one motion.

D. SPIDERS

BROWN RECLUSE

Description: Brown to black in color with a chunky body with long, slim legs 1 to 2 inches long. Has a prominent violin shaped light spot on the back of its body.

Habitat: Lives in caves and dark places, under debris such as rocks, logs, and thick underbrush. Found In: Southern United States

Symptoms: Usually causes severe pain and burning in the first 10 minutes after the bite, accompanied by itching. The bite takes on a bulls-eye appearance, with a center blister surrounded by an angry looking red ring, and then a white ring. The blister breaks open, leaving an ulcer that scabs over. The ulcer can enlarge and begin killing the underlying skin and muscle tissue. Pain may become severe. A generalized red, itchy rash usually appears in the first 24-48 hours. Other symptoms include fever, chills, nausea, vomiting, muscle aches, and hemolytic anemia (a condition where the red blood cells are destroyed).

Treatment: Wash the wound and apply an antibiotic ointment. The victim should seek immediate medical attention. If there are any signs of infection, an ulcer that does not heal, a bite accompanied by nausea, vomiting, fever or rash, follow-up treatment is warranted. Anytime there is a bite or wound that is not healing or is getting worse, see a physician. The bite of a brown recluse is serious and is associated with tissue destruction (necrosis) and may require surgical treatment.

BROWN SPIDER

Description: Is light tan to brown with a violin-shaped marking on the back of the head/chest region. With legs extended, it is approximately the size of a nickel to a quarter.

Habitat: Dry, littered, and undisturbed areas, such as closets, woodpiles and under sinks. Found In: United States

Treatment: Localized pain may develop in the first few hours. The site may become inflamed with swelling and blister formations developing as early as 12 hours to several days following the bite. This site will evolve into a bulls-eye lesion with a dark center outlined by white and set on a red and inflamed background. Additional symptoms may include flu-like symptoms including nausea, vomiting, and malaise may appear in the first 24 hours. Keep the affected area clean with soap and water to prevent infection. Medical treatment is advised.

BLACK WIDOW

Description: Small, dark-colored spiders with an hourglass shaped red, white or orange spot on the abdomen. Including the legs, the black widow generally measures from one-half to one inch in length.

Habitat: Under logs, rocks, underbrush, and debris and in shady places.

Found In: North America

Symptoms: The affected area gives the appearance of a target with a pale area surrounded by a red ring. Severe muscle pain and cramps may develop in the first two hours. Severe cramps are usually first felt in the back, shoulders, abdomen, and thighs. Other symptoms include weakness, sweating, headache, anxiety, itching, nausea, vomiting, difficulty breathing, and increased blood pressure.

Treatment: Clean the affected area with soap and water. Apply a cool compress over the bite location and keep the affected limb elevated to about heart level. Aspirin or Tylenol may be used to relieve minor symptoms. Immediate medical attention is advised.

JUMPING SPIDER

Description: Most common biting spider in the United States.

Habitat: Lives in trees, scrubs, and grass, on the ground and near buildings.

Found In: United States

Symptoms: Bites from jumping spiders are painful, itchy, and cause redness, and significant swelling. Other symptoms may include painful muscles and joints, headache, fever, chills, nausea, and vomiting.

Treatment: Keep the affected area clean with soap and water to prevent infection. Medical treatment is advised.

TARANTULA

Description: Very large, brown, black, reddish, hairy spiders, often sold as pets. Large fangs inflict a painful bite.

Habitat: Lives in warm places.

Found In: North America

Symptoms: Bites are unlikely to cause problems other than pain in the affected area. Skin exposure to the urticating's hairs on the spider's abdomen will cause itching and a rash.

Treatment: Clean the affected area with soap and water and protect against infection. Skin exposure to the urticating's hairs is managed by removing the hairs with tape.

WOLF SPIDER

Description: Large, hairy spiders, up to 3 to 4 inches across. They are mottled gray-brown color. Female wolf spiders carry their young on their back. They are aggressive, come after their prey, and are fast runners.

Habitat: Hide in the sand, gravel, leaves, and other debris. They tend to burrow into the earth and hide.

Found In: Worldwide

Symptoms: Bites can cause pain, redness, and swelling. The large jaws/fangs can cause a tear in the skin as they bite. Swollen lymph glands may develop. The skin may turn black. Swelling and pain may last up to ten days.

Treatment: Clean the bite with soap and water and take precautions to prevent infection. If symptoms worsen, seek medical attention.

E. SNAKES

AERICAN COPERHEAD

Description: Chestnut color dominates overall with darker cross-bands of rich browns that become narrower on top and widen at the bottom. The top of the head is a copper color. The average length is 24 inches with a maximum of 47 inches.

Habitat: They live in wooded and rocky areas and mountainous regions. Most commonly found in wooded areas near water, often under debris, and around old buildings.

Found In: AL, AR, FL, IL, KS, LA, MA, MD, NY, OH, OK, PA, TN, and TX

Treatment: Calm and reassure the patient. Gently wash the area with soap and water. Apply a cold, wet cloth over the bite. Remove any constricting items, such as jewelry, from the affected limb. When practical, immobilize the affected limb at approximately heart level. Take the patient to the hospital.

CORAL SNAKE

Description: Beautifully marked with bright blacks, reds, and yellows. WHEN RED TOUCHES YELLOW, IT IS A CORAL SNAKE. The average length is 24 inches with a maximum of 45 inches.

Habitat: They live in wooded areas, swamps, palmetto, and shrub areas, and often venture into residential locations.

Found In: Florida, North Carolina, and Texas

Symptoms: A bite will cause tiny puncture wounds, minimal pain, and swelling. Symptoms are often delayed. Complaints of drowsiness, apprehension, giddiness, nausea, vomiting, and salivation can appear 1 to 7 hours after the bite.

Treatment: Calm and reassure the patient. Gently wash the area with soap and water. Apply a cold, wet cloth over the bite. Remove any constricting items, such as jewelry, from the affected limb. When practical, immobilize the affected limb at approximately heart level. Take the patient to the hospital.

COTTON MOUTH (WATER MOCCASAIN)

Description: Adults are uniformly olive brown or black. Their young are cross banded with dark brown. They average 30 to 48 inches.

Habitat: They live in swamps, lakes, rivers, ditches, and along any freshwater habitat in Florida.

Found In: Southeastern United States (Southern Illinois to Texas eastward)

Treatment: Calm and reassure the patient. Gently wash the area with soap and water. Apply a cold, wet cloth over the bite. Remove any constricting items, such as jewelry, from the affected limb. When practical, immobilize the affected limb at approximately heart level. Take the patient to the hospital.

EASTERN DIAMONDBACK RATTLESNAKE

Description: They are dark brown or black, outlined by a row of cream or yellowish scales. Ground color is olive to brown. They average 4.5 feet in length to a maximum of 8 feet.

Habitat: Palmettos and shrubs, swamps, pine woods, and flat woods.

Found In: Southeastern United States

Symptoms: A rattlesnake can bite without injecting venom; this is called a dry bite. Even though not poisoned, the painful bite can still become infected. If a rattlesnake injects venom into the

wound, the following may occur swelling, pain, bleeding at the site, nausea, vomiting, sweating, chills, dizziness, weakness, numbness, tingling of the mouth or tongue, and changes in heart rate and blood pressure. Other symptoms can include excessive salivation, thirst, swollen eyelids, blurred vision, muscle spasms, and unconsciousness. Rattlesnake venom also interferes with the ability to clot blood properly.

Treatment: Calm and reassure the patient. Gently wash the area with soap and water. Apply a cold, wet cloth over the bite. Remove any constricting items, such as jewelry, from the affected limb. When practical, immobilize the affected limb at approximately heart level. Take the patient to the hospital.

MOJAVE RATTLESNAKE

Description: This snake's entire body is a pallid or sandy color, with darker diamond-shaped markings bordered by lighter colored scales and black bands around the tail. They average 29 inches in length with a maximum of 49 inches.

Habitat: Arid regions, deserts, and rocky hillsides from sea level to an elevation of approximately 8300 feet.

Found In: California, Nevada, SW Arizona, and Texas

Symptoms: A rattlesnake can bite without injecting venom; this is called a dry bite. Even though not poisoned, the painful bite can still become infected. If a rattlesnake injects venom into the wound, the following may occur swelling, pain, bleeding at the site, nausea, vomiting, sweating, chills, dizziness, weakness, numbness, tingling of the mouth or tongue, and changes in heart rate and blood pressure. Other symptoms can include excessive salivation, thirst, swollen eyelids, blurred vision, muscle spasms, and unconsciousness. Rattlesnake venom also interferes with the ability to clot blood properly.

Treatment: Calm and reassure the patient. Gently wash the area with soap and water. Apply a cold, wet cloth over the bite. Remove any constricting items, such as jewelry, from the affected limb. When practical, immobilize the affected limb at approximately heart level. Take the patient to the hospital.

PIGMY RATTLESNAKE

Description: They are approximately 18 inches long, gray in color with gray-brown circular markings on the body and small rattles at the end of the tail. This aggressive little snake will attack anyone within striking distance.

Habitat: They live in grasslands, deserts, woodlands, and canyons.

Found In: Texas/Oklahoma east to South Carolina and the Florida Keys.

Symptoms: A rattlesnake can bite without injecting venom; this is called a dry bite. Even though not poisoned, the painful bite can still become infected. If a rattlesnake injects venom into the wound, the following may occur swelling, pain, bleeding at the site, nausea, vomiting, sweating, chills, dizziness, weakness, numbness, tingling of the mouth or tongue, and changes in heart rate and blood pressure. Other symptoms can include excessive salivation, thirst, swollen eyelids, blurred vision, muscle spasms, and unconsciousness. Rattlesnake venom also interferes with the ability to clot blood properly.

Treatment: Calm and reassure the patient. Gently wash the area with soap and water. Apply a cold, wet cloth over the bite. Remove any constricting items, such as jewelry, from the affected limb. When practical, immobilize the affected limb at approximately heart level. Take the patient to the hospital.

WESTERN DIAMONDBACK RATTLESNAKE

Description: They are light, buff-colored with darker brown, diamond-shaped markings. The tail has heavy black and white bands. They average 3 to 7 feet in length.

Habitat: They live in grasslands, deserts, woodlands, and canyons.

Found In: Arizona, California, New Mexico, Oklahoma, and Texas.

Symptoms: A rattlesnake can bite without injecting venom; this is called a dry bite. Even though not poisoned, the painful bite can still become infected. If a rattlesnake injects venom into the wound, the following may occur swelling, pain, bleeding at the site, nausea, vomiting, sweating, chills, dizziness, weakness, numbness, tingling of the mouth or tongue, and changes in heart rate and blood pressure. Other symptoms can include excessive salivation, thirst, swollen eyelids, blurred vision, muscle spasms, and unconsciousness. Rattlesnake venom also interferes with the ability to clot blood properly.

Treatment: Calm and reassure the patient. Gently wash the area with soap and water. Apply a cold, wet cloth over the bite. Remove any constricting items, such as jewelry, from the affected limb. When practical, immobilize the affected limb at approximately heart level. Take the patient to the hospital.

F. ALLIGATOR AWARENESS AND SAFETY

Alligators inhabit the Gulf Coast States from Florida to Texas and the Atlantic coast from Florida to North Carolina. The preferred habitat is freshwater environments such as lakes, swamps, rivers, ponds, and wetlands. Agents and field personnel should be aware of the potential hazards that are posed by alligators and understand how to work safely when in their habitat. The following information will highlight basic information that all field personnel with a reasonable potential to encounter an alligator should be aware of.

• Never feed alligators. In many states, it is actually illegal to feed alligators. Feeding alligators cause them to associate humans with food. This behavior increases the potential for alligator attacks

• **Never** attempt to move alligators from a roadway. If an alligator is encountered on the road, allow it to pass through. Maintain a safe distance, even inside a vehicle.

• Never molest, harass, or provoke alligators in any way.

• **Never** disturb alligator nests. Female alligators can become aggressive when nests or juveniles are threatened.

• **Never** corner an alligator. If an alligator is encountered, do not block the animal's escape or approach the animal in any manner.

- Never enter the water alone.
- Never enter the water at night or in low light conditions such as dawn or dusk.
- Always be alert when in or near water where alligators may be present.

• Always keep your distance from any alligator you see. A minimum of 60 feet should be maintained from adult alligators.

• Always move rapidly in a straight line away from a charging alligator. Running in a zigzag pattern is a myth. Running in a straight line is more effective at placing distance between you and the slower moving alligator.

- Always fight if attacked. If attacked by an alligator, always fight back.
- Always report any incident or aggression by alligators to authorities.
- MAMMALS

BATS

G.

Description: Small, agile flyers that can carry diseases and infections and will bite readily when handled. Avoid any sick or injured bat.

Habitat: Bats live in caves and other enclosed areas such as attics.

Found In: Worldwide

Treatment: Bites could lead to diseases (e.g. rabies). Seek immediate medical attention.

OTHER SMALL MAMMALS – Raccoons, Rats, Mice, Opossum, Foxes, etc

Description: Small mammals may carry diseases and infections and will bite readily when handled. Do not feed any small mammal. Avoid any sick or injured small mammal.

Habitat: Wooded areas, any area

Found In: varies by animal; Worldwide

Treatment: Bites could lead to diseases (e.g. rabies). Seek immediate medical attention.

LARGE MAMMALS (bears, mountain lions, wolves, coyotes, feral hogs, etc)

BEARS

Tolerance and an appreciation for the unpredictable nature of resident wildlife is increasingly important. Negative encounters are often a result of human carelessness rather than an aggressive act by the animal. This is especially true with bears. Most bear "attacks" are caused by surprising a bear and usually can be prevented. Understanding bear behavior and recognizing bear signs are important when working, hiking or camping in Bear Country.

Black Bear Facts

- Black bears have a keen sense of smell (7 times more powerful than dogs); can detect odors over a mile away.
- They can go without food for 6 to 7 months during hibernation in their northern range.
- Black bears are very curious, resourceful, and intelligent.
- They have an excellent memory and remember food sources for many years.
- They are usually nervous, shy, and easily frightened and can cause serious injury if startled, cornered, or provoked.
- Black bears usually prefer to avoid humans.
- Black bears are opportunistic; will take advantage of readily available food.
- They become bolder when hungry or habituated.
- Black bears are very powerful and strong, thus should be treated with caution and respect.
- They are proficient at climbing, swimming, and running.
- They often avoid open areas and prefer the protective cover of trees and thickets.
- Their diet consists of approximately 85% vegetable matter including nuts, berries, seeds, grasses.
- They stand up on hind legs NOT to attack but out of curiosity and to get a better look or smell.

Bears are naturally afraid of humans that may become "habituated" or accustomed to people along popular hiking trails. Keep the area safe for humans and bears by never feeding or approaching bears. Should a bear come near you he is most likely curious or smells something interesting. If he stands up, he is not going to attack but is trying to get a better look or smell. Bear attacks are extremely rare and by comparison, a person is about 67 times more likely to be killed by a dog or 90,000 times more likely to be killed in a homicide. Bears are powerful and strong animals; they should always be treated with caution and respect.

Bear Encounter Guidelines

- If a bear approaches you, stay calm.
- ABSOLUTELY DO NOT RUN (running may elicit a chase response in the bear).
- Pick up small children so they don't run, scream or panic.

• Gather the group together and restrain your dog if you have one.

• Let the bear know you are human; talk in a soothing voice; lift arms overhead to look bigger.

- Slowly back away and avoid direct eye contact with the bear.
- If the bear lunges, snaps his jaws, slaps ground or brush with their paw, it feels threatened -you are too close.
- The bear may also suddenly rush forward and stop as a "bluffing" tactic to intimidate you to leave; momentarily hold your ground, then keep backing away and talking softly.
- Don't crowd the bear; leave him a clear escape route.
- Retreat from the area or make a very wide detour around the bear.
- If he continues to follow you, stand your ground and yell, clap your hands, wave your arms, or throw something toward him, repeat until he leaves.
- As a last resort, drop something like a hat to distract him but avoid tossing him food or your backpack as he will quickly learn to confront other humans for food rewards.

Black Bear Characteristics

- Color varies from blonde to black.
- No distinctive shoulder hump.
- Rump is higher than front shoulders.
- Face profile is straight.
- Ears are taller and less rounded than Grizzly bear ears.
- Front claws are 1-2 inches long and curved to facilitate climbing. Grizzly Bear
- Color varies from blond to black.
- Distinctive shoulder hump.
- Rump is lower than shoulder hump.
- Face profile appears dished in.
- Ears are short and rounded.
- Front claws are 2-4 inches long, depending on the amount of digging the bear does, and are slightly curved. Claw marks are usually visible in tracks.

Color and size can be misleading and should not be used as identifying features when identifying bears.

Know Your Bears



Diagram: SteVen Herrero

How to Identify

Follow the numbers in each step:

- Find the lowest point of outside (largest) toe
- Find the highest point on front edge of palm pad.
- 3 Connect points 1 and 2; extend this line to the inside of the track.
 - If more than 50% of the inside (smallest) toe is above the line, the track is from a grizzly bear.
 - If more than 50% of the inside (smallest) toe is below the line, the track is from a black bear.
 - If the line bisects the inside toe, claw marks, shape of the palm pad, spacing between toes, other signs must be used in species identification.

Tracks of big grizzlies are larger

MOUNTAIN LIONS

Mountain Lions are quite elusive animals and encounters with them are rare. They generally are reclusive and avoid making any contact with humans. While it would be amazing to spot one in the wild, we must keep our safety in mind, because mountain lions are carnivores that have killed people in the past.

The secretive mountain lion is also popularly referred to as a cougar. These mountain cats are primarily nocturnal and are most active at dusk/dawn, which is one reason why hikers rarely see them. Pair that with the fact that they prefer terrain less traveled by people. They spend their time in areas with the rocky and rugged terrain, dense vegetative cover or even in swamps.

Be especially careful when working, hiking or camping with children in known mountain lion territory.

- Always keep children and teenagers close by.
- Mountain Lions are attracted to children, so don't let them wonder too far away.
- Mountain lions see children as small prey animals, which can sometimes tempt them to attack.

Awareness is your most powerful weapon. Situational awareness is your best defense from being attacked and is the only way to ensure your safety in the wilderness.

- Are the birds chirping? Are squirrels chattering? If you stop hearing animal noises, you need to ask yourself why. What's in the area that these animals see as a threat?
- Be on the lookout for fresh cougar tracks or signs of scat. This is especially important anytime you see fresh tracks over areas that you've already walked on. This is a surefire sign that you're being tracked and stalked.

Making Noise can actually help. If you're walking in an area where there's a probability of there being mountain lions in the area, the last thing you want to do is be completely silent. Some people mistakenly think that silence will protect them from these types of predators; it won't. If you're in an area with a Mountain Lion, chances are it already knows your there, so silence isn't really going to help.

- Make noise when you're hiking, this will help ensure that you don't walk up on an unsuspecting lion.
- If a Mountain Lion hears you approaching, more often than not it will slip away into the brush to avoid a confrontation.

If you come upon a lion, give it plenty of space so it can escape. The chances of just happening upon a cougar are actually extremely low. These cats are ambush predators; you will very rarely see them until it's too late. That being said, if you do come upon one, make sure you give it space and NEVER EVER RUN!

- Running kicks in the cat's natural hunting instincts.
- If you run, you're probably going to be attacked. These cats see running as a sign that you are the prey; they will follow, and they will attack. Stand your ground, stand tall, and pick up any children that are with you.

• If they do present themselves to you, they may be trying to size you up and see how you react. Stand strong and make yourself look as big as possible. There's still a pretty good chance the cat will leave without any kind of confrontation.

If you are attacked, FIGHT BACK! Unlike bear attacks, experts say that you need to fight back when attacked by a Mountain Lion. Kick, gouge its eyes, hit it in the face, and do anything you can to make the lion rethink its attack.

- Once a lion has decided to attack, they have already decided that the gain of a meal outweighs the risk of injury to themselves. You need to fight back.
- NEVER GO DOWN! It may be the teeth and foreclaws that scare you, but cougars most often kill by tackling prey to the ground and disemboweling them with very powerful hind legs/claws.
- If you don't have a weapon close at hand, find anything in the area that can be used as a weapon and use it to fight back.
- Bear Pepper Spray is also useful against mountain lions. If you have some, it should be sprayed at the lion's nose and eyes.
- Travel in groups, NEVER ALONE.
- Consider taking a dog. While a dog is no match for a 150 to a 250lb cat, it can buy you some time. There's a pretty good chance the cat will probably go after the dog first. (Side note: Others say that taking a dog actually invites an attack as the mountain lion would be more likely to hunt a dog vs. a human and that leaving the dog at home would be a better idea.)
- When camping, avoid being alone. Retrieving wood/water should always be done in pairs. Two sets of eyes are better than one.



BOBCAT

COYOTE DOG

MOUNTAIN



WOLVES

In 1973, the US Fish and Wildlife Service listed the northern Rocky Mountain wolf (*Canis lupus*) as an endangered species and designated Greater Yellowstone as one of three recovery areas. From 1995 to 1997, 41 wild wolves from Canada and northwest Montana were released in Yellowstone National Park. As expected, wolves from the growing population dispersed to establish territories outside the park where they are less protected from human-caused mortalities.

- 26–36 inches high at the shoulder; 4–6 feet long from nose to tail tip.
- Males weigh 100–130 pounds; females weigh 80–110 pounds.
- Average lifespan is about 5 years in wild but have been known to live up to 12 years in the wild.
- Three color phases: gray, black, and white; gray is the most common; white is usually in the high Arctic, and black is common only in the Rockies.
- Prey primarily on hoofed animals. In Yellowstone, 90% of their winter diet is elk; more deer in summer; they also eat a variety of smaller mammals like beavers.
- Mate in February; give birth to an average of five pups in April after a gestation period of 63 days; young emerge from the den at 10–14 days; the pack remains at the den for 3–10 weeks unless disturbed.

Tips for dealing with wolves

Wolves are shy and generally avoid humans. However, they can lose their fear of humans when they learn to associate us and our surroundings with easily available food.

When this happens, wolves may become visible during daylight hours. They may be seen feeding at waste disposal sites and may approach camping areas, homes, and humans, increasing the possibility for conflict.

If you encounter a wolf:

- Stop. Face the wolf. If you are with others, stay together as a group.
- Do not approach the wolf or harass it, and do not feed the wolf.
- Make sure the wolf has a clear escape route.

If a wolf approaches you or acts aggressive (i.e., growls or snarls):

- Leave room for it to escape.
- Raise your arms and wave them in the air to make yourself look larger.
- Back away slowly while remaining calm; do not turn your back on, or run from, a wolf or any other wild animal.
- Make noise and throw objects at the wolf.

- Use whistles, personal alarm devices, or commercially available pepper spray to frighten an approaching or threatening animal.
- Keep waste properly stored in containers, and place them inside sheds, garages, or other enclosed structures.
- Keep food indoors or in the vehicle.
- Don't feed wildlife such as deer to prevent attracting wolves to your property or worksite; remove deer food and salt blocks.

Wolves are predatory animals that will attack almost anything when in a pack, including larger animals and even humans at times. Lone wolf attacks are also a possibility. That said, it is important to keep wolf attacks in perspective; the majority of wolves do their utmost to stay away from human beings (as they are afraid of them, and won't 'attack without good reason such as disease or you being on their territory), while bears, cougars and domestic dogs are much more dangerous to the human being, with wolf attacks rare by comparison. It is usually a case of hunger or something wrong with the wolf that leads to an attack on human beings. All the same, it always pays to be alert and ready whenever you're headed into wolf territory, and to know how to defend yourself should anything befall you by way of a wolf threat.

Upon encountering a wolf

If you see the wolf before it sees you, walk away silently. You don't want the wolf to see you. Remember, where there's one wolf, there may well be two or three more wolves around. If the wolf sees you, back away slowly. Avoid eye contact, wolves see eye contact as a challenge.

Escaping

If the wolf chases you, don't run. Wolves are faster than you. If you choose to attempt to escape, keep the wolves in front of you, not at your back for this will cause predatory instincts to kick in. Wolves can be easily distracted by food. Throw some if the wolf chases you.

Reacting to an attack

If the wolf attacks, curl up in a fetal position with your arms blocking your neck so that the wolf doesn't get a hold of typical bite zones, especially your neck and face. You may want to roll over on your back and avert eye contact (active submission) or lay as close to the ground as possible (passive submission). Unless it is an absolutely dire emergency, DO NOT try to fight the wolves. Most likely, they fight often and are probably stronger.

Keep your fear levels as low as possible. The animal can smell fear, and if you panic, you risk freezing or running, thereby losing your ability to fight to save your life. The wolf may also be able to "seek" our fear, trembling, stiffness, are easily seen by a wolf's eye, since they must be very observant, due to most of their body language, not vocalization.

If you do manage to drive off the wolf, get to safety calmly but quickly, staying alert. The wolf may be prowling near you or your campsite, awaiting another chance. Dogs are not spiteful; nor are wolves, but if they see you as prey for some reason or are ill, they may try to attack you again.

If in a group attacked by a lone wolf or a pack, make sure to keep all children and any badly injured persons in the center of the group for they will be the ones targeted most if wolves are attempting to attack you. No matter what, do not break the group up for that is what the wolves are hoping for.

Wolves aim to find the weakest link in prey groups. Children are the most likely to be targeted as they are the most vulnerable due to size and lack of strength. In the case of predatory attacks by wolves, over ninety percent of such attacks have been on children.

Don't treat the wolf as if it were a dog. Wolves have a jaw power of 15,000 lbs. per square inch.

Remain calm. Panicking may cause you to behave instinctively, which may lead to you inadvertently causing some sort of disaster.

- Hiding from the wolves will be useless -hey can hear ultrasonic sounds and a single molecule is all it takes for them to be able to smell something.
- Do not leave children alone (without another, preferably an adult, supervisor) when hiking, camping or moving through areas known to have wolves (and any other predators). Children are vulnerable due to their size and lack of strength, along with the possibility that they may fail to recognize the dangers.
- If the wolves are in a pack formation, you may be outnumbered and it may be harder to drive them away, especially if the pack is very large (wolf packs are usually only six or so wolves but may occasionally have up to thirty).



PLANTS

Plants generally poison by:

- Ingestion: When a person eats a part of a poisonous plant.
- **Contact:** When a person makes contact with a plant that causes any type of skin irritation or dermatitis.
- **Absorption or inhalation:** When a person either absorbs the poison through the skin or inhales through the respiratory system.

INGESTION

Description: Ingestion poisoning can be very serious and could lead to death very quickly. Do not eat any plant unless you have positively identified it first. Keep a log of all plants eaten.

Symptoms: Can include nausea, vomiting, diarrhea, abdominal cramps, depressed heartbeat and respiration, headaches, hallucinations, dry mouth, unconsciousness, coma, and death.

Treatment: Try to remove the poisonous material from the victim's mouth and stomach as soon as possible. Induce vomiting by tickling the back of the throat, or by giving warm saltwater, if conscious. Dilute the poison by administering large quantities of water or milk, if conscious.

EXAMPLES OF COMMON PLANTS THAT SHOULD NOT BE INGESTED ARE:

CASTOR BEAN: This is a semi-woody plant with large alternate, star-like leaves that grows as a tree in tropical and temperate regions. Its flowers are small and inconspicuous. Its fruits grow in clusters at the tops of the plants, and the seeds are large and may be mistaken for a bean-like food.

CHINABERRY: This tree has a spreading crown and grows up to 14 meters tall. It has alternate, compound leaves with toothed leaflets. Its flowers are light purple with a dark center and grown in ball-like masses. It has marble-sized fruits that are light orange when first formed but turn lighter as they become older. This tree grows in the southern United States.

DEATH CAMAS: Arises from a bulb and may be mistaken for an onion-like plant. Its leaves are grass-like, with flowers that are six-parted, and the petals have a green, heart-shaped structure on them. The flowers grow on showy stalks above the leaves. Found in wet, open, sunny habitats, although some species favor dark, rocky slopes. Typically, the plant is located in eastern and western parts of the United States.

LANTANA: A shrub-like plant that may grow up to 45 centimeters high. It has opposite, round leaves, and flowers borne in flat-topped clusters. The flower colors may be white, yellow, orange, pink, or red. It has a very strong scent and is grown as an ornamental plant in tropical and temperate areas.

MACHINEEL: A tree reaching up to 15 meters high with alternate, shiny green leaves, and spikes of small greenish flowers. Its fruit are green or greenish-yellow when ripe. This tree is extremely toxic. It causes severe dermatitis in most individuals after only half an hour. Even water dripping from the leaves causes dermatitis. The smoke from burning it causes eye irritation. This tree is found in southern Florida.

OLEANDER: A shrub or small tree that grows to about 9 meters with alternate very straight, dark green leaves. Its flowers may be white, yellow, red, pink, or intermediate colors. Its fruit is a brown pod-like structure with many small seeds. All parts of this plant are very poisonous. It is grown as an ornamental plant in tropical and temperate regions.

PHYSIC NUT: A shrub or small tree with large 3 to 5 parted alternate leaves. It has small greenish-yellow flowers and its yellow apple-sized fruit contain 3 large seeds. It is grown in the southern United States.

POISON AND WATER HEMLOCKS: A biennial herb that may grow 2.5 meters high. The smooth, hollow stem may or may not be purple or red-striped or mottled. Its white flowers are small and grown in small groups that tend to form flat umbels. Its long, turnip-like taproot is solid. This plant is very poisonous, and even a very small amount can cause death. This plant is easy to confuse with the wild carrot or Queen Anne's lace, especially in the first stage of growth. Wild carrot or Queen Anne's lace have hairy leaves and stems and smell like a carrot. Poison hemlock does not. It grows in wet, moist ground like swamps, meadows, stream banks, and ditches and is grown in the United States and Canada.

ROSARY PEA: This plant is a vine with alternate compound leaves, light purple flowers, and beautiful seeds that are red and black. This plant is one of the most dangerous plants. One seed may contain enough poison to kill an adult. This is a common weed in southern Florida, Hawaii, and the Caribbean.

CONTACT

Description: The effects may be persistent, spread by scratching, and are particularly dangerous if there is contact in or around the eyes. Never burn a contact poisonous plant because the smoke may be as harmful as the plant. The toxin is usually oil that gets on the skin upon contact with the plant. The oil can get on equipment and then infect whoever touches the equipment.

Symptoms: May take a few hours to several days to appear, and may be local, or may spread over the body.

Treatment: Try to remove the oil by washing with soap and cold water. If water is not available, wipe your skin repeatedly with dirt or sand. DO NOT use dirt if blisters have developed. After you have removed the oil, dry the area. You can wash with a tannic acid solution and crush and rub jewelweed on the affected area to treat plant caused rashes. You can make a tannic acid from oak bark.

SOME COMMON PLANTS THAT INFECT BY CONTACT ARE:

COWHAGE: A vine-like plant that has oval leaflets in groups of three, and hairy spikes with dull purplish flowers. The seeds are brown, hairy pods. Contact with the pods can cause irritation and blindness if in the eyes.

POISON IVY: This plant has alternate, compound leaves with three leaflets, leaves are smooth or serrated, and grows as a vine along the ground or climbs by red feeder roots. This plant is found in all the United States.

POISON OAK: This plant has alternate, compound leaves with three leaflets; leaves are lobed and resemble oak leaves and grow like a bush. The greenish, white flowers are small and inconspicuous and are followed by waxy green berries that turn waxy white or yellow, then gray. The plant is found in all the United States.

POISON SUMAC: This is a shrub that grows to 8.5 meters tall and has alternate; pinnately compound leaf stalks with 7 to 13 leaflets. Flowers are greenish yellow and inconspicuous and are followed by white or pale-yellow berries. This grows only in wet, acid swamps in North America.

TRUMPET VINE: A woody vine that may climb to 15 meters high. It has pea-like fruit capsules. The leaves are pinnately compound with 7 to 11 toothed leaves per leaf stoke. The trumpet-shaped flowers are orange to scarlet in color. The vine is found in wet woods and thickets throughout eastern and central North America.

GIANT HOGWEED: Also known as "Cow Parsnip" or "Hogsbane", this plant is a dangerous and invasive weed, which recently crossed into the United States from Canada. Sap from the plant can burn and scar your skin and cause total blindness if it gets into your eyes. The sap is found in the leaves, roots, flowers, seeds, and stem hair of the plant. Hogweed is part of the carrot family but can grow up to 18 feet tall.

As noxious as the plant is, it is surprisingly pretty, thick leaves up to 5 feet wide, and large clusters of white flowers at the top in an umbrella pattern. The stems are green with purple blotches and have white "stem hair."

The plant has been found in New York, Pennsylvania, Ohio, Maryland, Oregon, Washington, New Hampshire and Maine. Contact with the plant causes light-sensitive skin reaction that causes dark painful blisters that can last several months to several years. The picture below is an example of the blisters that result from contact with Giant Hogweed.



PLANTS AND ANIMAL IDENTIFICATION

December 30, 2015

The following pictures and photographs are meant to serve as an example only and should not be considered to be a definitive guide to the plants and animals represented.

Animals

Gila Monster


Ants







Scorpions



Vinegroons



Centipedes

Millipedes





Bees





Wasps



Percheron Safety Manual - Subpart O

Hornets





Mosquitoes





Ticks





Leeches



Bats



Spiders

Brown Recluse

Black Widow





Jumping Spider

Tarantula





Wolf Spider



Snakes

American Copperhead





Coral Snake



Cottonmouth (Water Moccasin)





Eastern Diamondback Rattlesnake



Mojave Rattlesnake



Pygmy Rattlesnake



Western Diamondback Rattlesnake



American Alligator





Plants

Castor Bean





Chinaberry



Death Camas



Lantana





Machineel



Oleander



Physic Nut



Percheron Safety Manual - Subpart O



Poison Hemlock



Water Hemlock



Rosary Pea



Cowhage



Poison Ivy



Poison Sumac



Poison Oak





Trumpet Vine



Hogweed





SUBPART P – TOXIC AND HAZARDOUS MATERIALS SUBSTANCES

ASBESTOS AWARENESS

June 19, 2018

Asbestos Awareness Policy

The purpose of this program is to provide information about asbestos, the potential health effects associated with exposure, and safety procedures that should be followed to reduce exposure and protect the health of employees.

Types of Asbestos

The term "asbestos" is a name that refers to six naturally occurring minerals. The three types most commonly used in buildings are chrysotile, amosite, and crocidolite. Chrysotile accounts for approximately 95% of the asbestos used in commercial products. Chrysotile is commonly called white asbestos because of its natural color. Amosite, known as brown asbestos, is the second most likely type found in buildings. It is hard to wet and therefore hard to control. Amosite is commonly found in boilers and pipes. The third type of asbestos is known as crocidolite. It is also known as blue asbestos or blue mud. Crocidolite is used in high temperature applications around pipes.

Identifying Asbestos

There are many substances that workers contact that may contain asbestos and have the potential to release fibers. Only rarely can asbestos in a product be determined from labeling or by consulting the manufacture. The presence of asbestos cannot be confirmed visually. The only way to positively identify asbestos is through laboratory analysis of samples. If the presence of asbestos is suspected always assume that it is an asbestos containing material and have it analyzed.

Friable Asbestos

The potential for a product containing asbestos to release fibers depends on its degree of friability. Friable ACM can easily be crumbled or reduced to a powder by hand pressure, releasing fibers into the air.

The white fibrous or fluffy spray-applied asbestos material found in many buildings for fireproofing, insulating, sound proofing, or decorative purposes are friable. Friable ACM is found primarily in building areas not generally accessible to the public, such as boiler and machinery rooms. For example, asbestos insulation around pipes and boilers is considered friable.

Asbestos that is tightly bound with another material is considered non-friable and will only release fibers if sanded, cut, or broken. For example, ceiling tiles containing asbestos, and asbestos-cement pipe or sheets will not normally release fibers unless cut or broken. Vinyl asbestos tile is also considered non-friable and generally does not emit fibers unless sanded, cut, or sawed.

Uses of Asbestos

Asbestos has been used for over three thousand years. There was very little use for asbestos until the start of the twentieth century when it was used as thermal insulation in steam engines. Since then it has been used in thousands of products. Consumption in the U.S. increased to a peak of 800,000 tons per year in the early 1970s. Because of health concerns, however, consumption has dropped by more than 70%.

Asbestos gained widespread use because it is plentiful, readily available, and low in cost. It has several properties that make it very desirable to industry such as fire resistance, high strength, poor heat and electric conductor, and resistance to chemicals. These properties have made it useful for electrical, acoustical, and thermal insulation and products that resist fire, friction, and chemicals.

Examples of these uses include automotive brake and clutch linings, floor and ceiling tiles, plastics, asbestos-cement pipes and sheets, paper products, textile products such as curtains and gloves, and insulation for boilers and pipes. It is also present in sprayed-on materials located on beams, in crawlspaces, and between walls. The amount of asbestos contained in these products may vary from 1-100%.

Health Hazards

The increase in the use of asbestos resulted in a dramatic rise in asbestos related diseases among workers. At first, asbestos was not regarded as a health hazard because it has no taste or odor, often cannot be seen, and causes no immediate health effects. Health problems however, developed over time in exposed workers. It was not until the 1950s that asbestos received widespread attention as a potential health hazard. The diseases associated with asbestos did not appear for 20-40 years after the initial exposure, making it very difficult to confirm asbestos as the cause. However, overwhelming evidence now exists that exposure to airborne asbestos fibers is linked to several serious diseases.

Exposure to asbestos can cause disabling respiratory diseases and several types of cancer. The main routes of exposure are inhalation and ingestion. Asbestos fibers cannot penetrate the skin. Asbestos has been shown to cause asbestosis, lung cancer, mesothelioma, and cancer of the stomach and colon. The majority of people who died from asbestos exposure were exposed to very high concentrations of asbestos fibers at work and had little or no protection. These employees worked with asbestos regularly and for long periods of time. Examples include workers who held jobs in industries such as shipbuilding, mining, milling, and fabricating. Many of these workers were also smokers.

The most dangerous exposure to asbestos is from inhaling airborne fibers. The body's defenses can trap and expel many of the particles. However, as the level of asbestos fibers increase many fibers bypass these defenses and become embedded in the lungs. The fibers are not broken down by the body and can remain in body tissue indefinitely.

The Respiratory System

Since the primary health effects due to asbestos exposure are on the lungs, it is important to know how the respiratory system works. Air passes through the mouth and nose into the windpipe which splits into two smaller airways called the bronchi. The bronchi divide into smaller and smaller tubes which terminate into air sacs called alveoli. It is in these air sacs that oxygen is absorbed into small blood

vessels and carbon dioxide passes out of the blood.

The lungs are surrounded by a thin membrane which looks like saran wrap. These membranes are very moist and slide easily across each other, but are difficult to pull apart. The linings are composed of cells known as mesothelial cells. Interaction of asbestos with these cells can result in a cancer called mesothelioma. If the linings are damaged, inhalation cannot occur properly.

The body has several mechanisms to filter the air we breathe. Large particles are trapped by the hairs in the nose. Smaller particles impact on the mucous coated walls of airway and are caught. The airway has hair-like linings (ciliated cells) which constantly beat upward. Dust particles caught in the mucous are swept upwards into the back of the mouth and swallowed. Cigarette smoking temporarily paralyzes these hair-like projections preventing them from discharging the dust particles. This is one reason cigarette smokers who work with asbestos are at increased risk.

Particles reaching the tiny air sacs are engulfed by large cells called macrophages. However, because asbestos is a mineral fiber they are often unsuccessful. When this occurs the macrophages deposit a coating on the fiber and may form scar tissue around it.

Asbestosis

Asbestos is a non-cancerous chronic respiratory disease caused by an accumulation of asbestos fibers in the lungs. The fibers cut the air sacs and cause scar tissue to form. Even after exposure to asbestos has stopped, scar tissue will continue to form around existing scar tissue and fibers in the lungs. The scarring reduces the capacity of the lung to take in air resulting in shortness of breath, coughing, and fatigue. As the disease worsens, shortness of breath occurs even at rest. In severe cases death may be caused by respiratory or cardiac failure.

Asbestosis is typically found in workers who have been exposed to large doses of asbestos over a long time. The greater the asbestos exposure the more likely asbestosis will develop. It may take 15-30 years for the disease to develop. Because the presence of asbestosis indicates that workers have been exposed to a large dose of asbestos, they are at greater risk for lung cancer.

Class Types of Asbestos Work

<u>Class I Asbestos Work</u> - Is the most hazardous class of asbestos jobs. This work consists of removing the thermal insulation on materials known to contain asbestos. Common examples include removal of plaster on ceilings and walls or thermal system insulation around pipes, boilers, tanks, and ducts. In order to perform Class I asbestos work, employees are required to complete 32 hours of Asbestos Workers Training.

<u>Class II Asbestos Work</u> - Is nearly as hazardous as class 1 except it involves the removal of miscellaneous material, other than surfacing material or thermal system isolation, such as floor and ceiling tiles,

linoleum, roofing shingles, or transit pipes. In order to perform class II asbestos work, employees are required to complete 32 hours of Asbestos Workers Training.

<u>Class III Asbestos Work</u> – is the repair and maintenance of material containing asbestos. As asbestos can still be disturbed during maintenance work, it is important to take caution. In order to perform class III asbestos work, employees are required to complete 16 hours of Operation & Maintenance (O&M) asbestos training.

<u>Class IV Asbestos Work</u> – is the least hazardous of all classes and consists of performing jobs where ACM is present but not disturbed. In order to perform class IV asbestos work, employees are required to complete a two-hour asbestos awareness training informing the employees of where the asbestos is located, leave the asbestos undamaged, and report any area containing asbestos that may be damaged.

Percheron's normal scope of work does not typically include exposure to asbestos. However, employees that are required to perform work on multi-contractor worksites or in areas containing asbestos, will be protected from exposure to ACM. If an employee or crew is required to work in an area where there may be exposure to Class I or II asbestos work and risk exposure to ACM due to the inadequate containment of such job, all crew members will be notified and immediately removed from the area until the area is safe from exposure.

By project, if work contains ACM; Percheron will ensure employees are issued the proper personal protective equipment and require employees to complete the appropriate asbestos training as listed above prior to the job start date. Percheron shall maintain asbestos awareness training records and documentation for employees subject to working around asbestos.

Safe Work Practices – Reducing Exposure

An Operation and Maintenance Program is designed to manage asbestos in place to safeguard the health of building occupants. This is accomplished by training, cleaning, work practices, and inspections to maintain ACM in good condition. Removal is often not the best course of action to reduce asbestos exposure. The O&M program is designed to prevent asbestos fiber release and control fiber releases if they occur. A well-run O&M program may be all that is necessary to control the release of fibers. Emphasizing the importance and effectiveness of a good O&M program is critical to putting the potential hazards of asbestos exposure in proper perspective. That effort centers on communicating the following five facts to employees:

- 1. Although asbestos is hazardous, the risk of asbestos-related disease depends upon exposure to airborne fibers. An individual must breathe asbestos fibers in order to develop an asbestos-related disease. How many fibers an individual must breathe are uncertain. However, at very low exposure levels, the risk may be negligible or zero.
- 2. The average airborne asbestos level in buildings is very low. Therefore, the health risk to most building occupants will be very low. An EPA study in 1987 found asbestos air levels in buildings to be essentially the same as levels outside. Based on that data, most building occupants (i.e.,

those unlikely to disturb ACM) appear to face only a very slight risk, if any, of developing an asbestos-related disease.

- 3. Removal is often not the best course of action to reduce asbestos exposure. In fact, improper removal can create a dangerous situation where none previously existed. Asbestos removals tend to elevate the airborne level of asbestos fibers in a building. Unless all safeguards are properly applied, a removal operation can actually increase rather than decrease the risk of asbestos related disease.
- 4. EPA only requires asbestos removal during building demolition or renovation activities. This is done to prevent significant public exposure to airborne fibers.
- 5. EPA recommends a proactive, in-place management program whenever ACM is discovered. In place management does not mean "do nothing." It means having a program that reduces the release of asbestos fibers and ensures that proper controls and cleanup procedures are implemented if fibers are released. If in doubt about the possibility of disturbing ACM during maintenance activities, adequate precautions should be taken to minimize fiber release.

Basic O&M procedures to minimize and/or contain asbestos fibers may include wet methods, HEPA vacuuming, area isolation, PPE, and avoidance of certain activities, such as sawing, sanding, and drilling ACM. The need for these practices varies with the situation. For example, removing light fixtures located near ACM may disturb the material and might involve the use of special cleaning, area isolation, and respiratory protection. Periodic emptying of a trash can near asbestos containing plaster may not disturb the material, so special work practices would be unnecessary.

ACM may readily release fibers into the air when certain mechanical operations are performed directly on it. For example, fiber release can occur when workers are drilling, cutting, sanding, breaking, or sawing vinyl asbestos floor tile. Maintenance or repair operations involving those actions should be eliminated or carefully controlled to prevent or minimize asbestos fiber release. Certain activities that occur near ACM can also cause damage which may result in asbestos fiber release. For example, maintenance and custodial staff may damage ACM accidentally with broom handles, ladders, and fork-lifts while performing other tasks. Activities performed near ACM should always be done in a way that minimizes fiber release.

The O&M program should include a system to control all work that could disturb ACM. The person requesting the work should submit a Job Request Form to the Asbestos Manager before any maintenance work is begun that could disturb ACM.

Informing Building Occupants and Workers

Owners should inform occupants and workers about the location of ACM and stress the need to avoid disturbing the material. Occupants should be notified because they are less likely to disturb the material and cause fiber release.

In maintenance areas (such as boiler rooms and equipment rooms) signs should be placed directly next

to boilers, pipes, and other equipment to remind maintenance workers not to disturb the ACM. As an alternative, color coding can be used to identify ACM if all potentially exposed workers understand the coding system.

When working on multi-contractor worksites, employees will be informed and protected from exposure to ACM.

The information given to building occupants should contain the following points:

- 1. The location, condition of the ACM, and the appropriate response.
- 2. Asbestos only presents a health hazard when fibers become airborne and are inhaled. The mere presence of ACM does not present a health hazard.
- 3. Do not disturb the ACM.
- 4. Report any evidence of disturbance or damage of ACM to supervision.
- 5. Report any dust or debris that might come from the ACM or any changes in the condition of ACM to supervision.
- 6. Cleaning and maintenance personnel are taking special precautions to properly clean up any asbestos dust and to guard against disturbing ACM.
- 7. All ACM is inspected periodically and additional measures will be taken if needed to protect the health of building occupants.

General Safety Procedures

Everyone has probably been exposed to asbestos because it is so widely used. However, the health risks associated with asbestos are directly related to the amount and frequency of exposure. Decreasing exposure to asbestos will decrease the health risks associated with it. This can be done by following safe work practices and taking proper precautions.

The health risks associated with exposure to asbestos occur when it is disturbed and releases fibers into the air. To reduce exposure, it is important to know where asbestos is located and to minimize activities that will release fibers into the air. The potential for a particular form of asbestos to release fibers will depend on several factors including the degree of friability, wear, age, and location.

Exposure to asbestos fibers can be hazardous. The following general precautions will reduce exposure and lower the risk of asbestos related health problems:

- 1. Drilling, sawing, or using nails on asbestos materials can release asbestos fibers and should be avoided.
- 2. Floor tiles, ceiling tiles or adhesives that contain asbestos should never be sanded.
- 3. Use care not to damage asbestos when moving furniture, ladders, or any other object.

- 4. Know where asbestos is located in your work area. Use common sense when working around products that contain asbestos. Avoid touching or disturbing asbestos materials on walls, ceilings, pipes, ducts, or boilers.
- 5. All asbestos containing materials should be checked periodically for damage or deterioration. Report any damage, change in condition, or loose asbestos containing material to a supervisor.
- 6. All removal or repair work involving asbestos must be done by specially trained personnel. OSHA and EPA regulations are very specific about work practices and equipment required to work safely with asbestos. These requirements may include proper respirators, special enclosures, training, exposure monitoring, long term record keeping, and medical surveillance.
- 7. Asbestos should always be handled wet to help prevent fibers from being released. If asbestos is soaked with water or a mixture of water and liquid detergent before it is handled, the fibers are too heavy to remain suspended in the air.
- 8. In the presence of asbestos dust above the PEL, the use of a respirator approved for asbestos work is required. A dust mask is not acceptable because asbestos fibers will pass through it.
- 9. Dusting, sweeping, or vacuuming dry asbestos with a standard vacuum cleaner will put the fibers back into the air. A vacuum cleaner with a special high efficiency filter (HEPA) must be used to vacuum asbestos dust.
- 10. If a HEPA vacuum is not used, cleanups must be done with a wet cloth or mop. The only exception to this would be if the moisture presents an additional hazard such as around electricity.
- 11. Asbestos waste, including all clean up materials, must be sealed in a double 6-mil plastic asbestos bag and properly labeled before being disposed in an EPA approved landfill.

Remember, the mere presence of asbestos itself does not create a health hazard unless the material is disturbed and releases fibers to the atmosphere. Protect yourself and others by being aware of where asbestos is located, the dangers involved, and using common sense when working around ACM.

BENZENE AWARENESS

May 1, 2020

This safety guideline is intended to provide suitable awareness information to all Percheron employees regarding the potential toxic effects of Benzene so that adequate measures can be taken to limit exposures through controls in the workplace.

GENERAL

Of all the hydrocarbons, Benzene poses the most serious long-term threat. Exposure over time, to even low levels of Benzene can cause leukemia, blood changes and aplastic anemia.

CHARACTERISTICS

Benzene is a colorless to light-yellow liquid with a pleasant, sweet odor.

- Formula (C6H6)
- CAS No.: 71-43-2

Benzene is a flammable liquid that can accumulate static electricity. Benzene vapors are heavier that air and may travel to a source of ignition and flash back. The vapors are readily dispersed by wind movement and/or air currents. Liquid benzene tends to float on water and may travel to a source of ignition and spread fire. Benzene is highly reactive with no oxidizing materials.

USES:

Benzene is a component of gasoline, both in the manufacturing process and found naturally in crude oil; Benzene is also used as a feed stock for chemical manufacturing.

HEALTH EFFECTS:

WARNING

Benzene is a cancer-causing agent in humans. All contact should be reduced to the lowest possible level. The above exposure limits are for air levels only. Skin contact may also cause overexposure.

Benzene is one of the most hazardous of all petroleum products because of its adverse health hazards and high flammability.

The following adverse health affects are important to remember where there may be a potential exposure to Benzene:

a) **Acute:** At high concentrations (1000 PPM) Benzene has an acute effect on the central nervous systems causing headaches, dizziness, drowsiness, unconsciousness, and possible death.

Acute exposure can also cause breathlessness, irritability, and giddiness.

b) Chronic: Benzene has the chronic exposure effect on bone marrow (aplastic anemia leukemia).

Chronic exposure can also cause convulsions, liver damage, heart damage, blood diseases (aplastic anemia), and cancer (leukemia). These symptoms can take months or years to surface and can develop without physical or visible indications.

- c) Repeated skin contact leads to irritant contact dermatitis (rash); as with any petroleum solvent (which Benzene is also classified as), it will leach the natural oils out of the skin. Direct contact with the skin can cause erythema and/or blistering.
- d) Benzene is irritating to eyes and mucous membranes.
- e) Flammable/dangerous fire risk: benzene has a very low flash point making it dangerous to have any open flame, spark or source of ignition when vapors are present.
- f) Explosive limits in air 1.5 to 8% by volume: benzene is highly flammable at low levels of vapor quantity in air.

PERSONAL PROTECTIVE MEASURES

Company employees are not permitted to work in areas where there may be a potential for Benzene exposure. It is the responsibility of the Contracting Company's Project Manager and the on-site supervisor/foreman to see that any jobsite that may expose employees to Benzene is not manned with personnel until it is proven that it is safe to work within the acceptable OSHA limits without personal protective equipment.

SPECIAL REQUIREMENTS

If it is necessary to perform any work where the exposure to Benzene is above the OSHA acceptable limits, then the company must implement a comprehensive OSHA mandated special safety policy and procedure that includes special elements of exposure monitoring, formal medical program, special personal protective equipment, and much more.

TRAINING

All employees will be provided awareness training in this program in order to be familiar with the potential hazards and proper safe work procedures to follow if exposed to this health hazard.

BLOOD-BORNE PATHOGENS

Control of Blood-Borne Pathogens Program

Medical Waste Treatment and Disposal Procedures

- 1. All Medical Wastes (those soiled with covered human body fluids) will be placed in a leak-proof container marked either *Biohazard or Medical Waste*. All other wastes will be discarded following customary procedures. The various types of bodily fluids that the affected company employees can reasonably be exposed to in the workplace include, but is not limited to blood, mucus, and saliva. Any engineering controls (medical waste bags, etc) will be examined on a regular schedule to ensure their effectiveness/availability. The only label or sign serving as a warning of infectious material that would be expected in a Percheron facility would be "BIOHAZARD" found on a bag containing contaminated / possibly contaminated items during a first aid case. (Note: Soiled feminine hygiene/sanitary napkins, soiled facial tissues, etc. are not considered a biohazard or medical waste. Pretreatment is not necessary; however, Employees should wear personal protective equipment and wash hands with antibacterial soap afterwards)
- 2. Don and use the required personal protective equipment when handling medical wastes as outlined in the *Personal Protective Equipment for Worker Protection* Poster. All necessary and required personal protective equipment shall be provided in the Blood-Borne Pathogen Kit located in each office. All Blood-Borne Pathogen Kits and personal protective equipment shall be provided at no cost to our employees for use as needed.
- 3. All accumulated medical wastes will be treated to remove biohazards using the following procedure:
 - Prepare a solution of 10 percent chlorine bleach to water (approximately 2 cups chlorine bleach to 1 gallon of water)
 - Pour solution over the medical wastes and thoroughly saturate
 - Let stand for 10 minutes and then transfer the treated material into a properly marked biohazard disposal bag.

Caution: Sharp objects (broken glass, hypodermic needles, etc.) should not be handled by hand to prevent accidental punctures and lacerations

- 4. Rinse medical wastes container with the 10 % Chlorine solution and return to service.
- 5. Wash hands and exposed areas with antibacterial soap.

Training and Program Availability

 A review and training of policies and procedures for Blood-Borne Pathogen Control, Universal Precautions and General Safety Rules will be provided upon initial hiring. Additional training will be conducted within 90 days of a change in standards, and annually within one year of last training.

- A copy of the Percheron Safety Program Manual and Code of Safe Practices will be provided to each employee of the Company. Additionally, an employee may obtain a copy of the Safety Program Manual and Code of Safe Practices, which shall include Blood-Borne Pathogen Control, Universal Precautions and General Safety Rules, from their Supervisor or Project Manager at any time.
- 3. A copy of the Company Blood-Borne Pathogen Program will also be provided with the Blood-Borne Pathogen Kit in each Office.
- 4. In an effort to promote hygiene and sanitary working conditions, all Company offices shall have available hand washing facilities. However, due to the fact that many employees are in remote locations or in field settings where hand washing facilities are not feasible, Percheron will provide antiseptic solution or towelettes for use in these areas.
- 5. Percheron, LLC and its Divisions and Subsidiaries will not perform invasive medical treatment or provide intravenous medication. Exposure to Blood-Borne Pathogens, is determined to be from rarely occurring routine and emergency first aid treatment of common workplace injuries. Therefore, occupational exposure is not a significant risk. If exposure does occur in an occupational setting, then Hepatitis B Vaccine shall be provided at no cost if it is deemed medically necessary for the vaccine to be administered.
- 6. Percheron, LLC will determine if job classifications are subject to occupational exposure in accordance with 1910.1030(c)(2)(i)(B) and prepare an exposure determination list. The exposure determination list shall include the following:
 - A list of all job classifications in which all employees in those job classifications have occupational exposure.
 - A list of job classifications in which some employees have occupational exposure.
 - A list of all tasks and procedures or groups of closely related tasks and procedures in which occupational exposure occurs and that are performed by employees in job classifications listed.

This exposure determination shall be made without regard to the use of personal protective equipment.

- 7. In the event of an occupational exposure all documents, medical records, incident reports and other relevant information will be maintained for the duration of employment or at least 30 years. Percheron will maintain compliance with CFR 1910.1020.
- 8. All records of Blood-Borne Pathogen training (date and content of training with name and title of attendees) will be maintained for a minimum of three years.

HYDROGEN SULFIDE (H2S)

November 24, 2020

The purpose of this program is to establish minimum requirements for H2S Safety where Hydrogen Sulfide is present or is recognized as potentially being present in the work environment.

Hydrogen Sulfide, also known as H2S, is an extremely toxic gas that is colorless, flammable, heavier than air, soluble in water, and has the smell of rotten eggs at lower concentrations. H2S is a by-product formed when organic matter decays under low oxygen conditions when sufficient amounts of sulfur and bacteria are present. H2S can be formed in many places such as:

- Oil and gas reservoirs
- Sewer and sewage processing facilities
- Dark damp places
- Decaying material in natural settings
- Vapor Recovery Units
- Well Heads or Tanks

- Production Separators
- Sulfur Removal Systems
- Water Knock-Outs
- Heat Treaters
- Flotation Cells
- Pits or Cellars

The health effects of hydrogen sulfide include irritation of the eyes, nose, throat and respiratory system. Hydrogen sulfide is both an irritant and a chemical asphyxiant with effects on both oxygen utilization and the central nervous system. Its health effects can vary depending on the level and duration of exposure.

Concentration	Health Effects
10 ppm	Beginning eye irritation
50-100 ppm	Slight respiratory tract irritation after 1 hour of exposure.
100 ppm	Coughing, eye irritation, loss of sense of smell after 2-15 minutes. Altered respiration, pain in the eyes, and drowsiness after 15-30 minutes followed by throat irritation after 1 hour. Several hours exposure results in gradual increase in severity of these symptoms and death may occur within the next 48 hours
200-300 ppm	Severe respiratory tract irritation after 1 hour of exposure. Possible pulmonary edema (fluid in the lungs).
500-700 ppm	Loss of consciousness and possibly death in 30 minutes to 1 hour.
700-1,000 ppm	Rapid unconsciousness, loss of respiration, and death after 1-3 minutes.
1,000-2,000ppm	Unconsciousness at once, loss of respiration and death in a few minutes. Death may occur even if individual is removed to fresh air at once.

Employees working in any potential H2S zone, regardless of the concentration, are required to wear a personal H2S monitor that is set to alarm at 10 PPM in the breathing zone, or 20 ppm or more at the source. The use of continuous direct reading personal monitors with audible, visual and/or vibrator alarms is required. The following requirements are applicable:

- Personal monitors shall be set to alarm at 10 ppm.
- Personal monitors shall be properly maintained and calibrated in accordance with the manufacturer's recommendation.
- Monitors shall be challenged, or "bumped", with span gas to test alarms prior to each use.
- Results for each calibration or bump test shall be recorded using the Bump Test Log found in Appendix A of this document.
- Personal monitors must be worn on the outside of all clothing and positioned close to the mouth and nose to measure air from the breathing zone.

If the monitor alarm sounds, employees must evacuate the area immediately. When personnel are made aware of such potential H2S environments, they shall immediately contact their supervisor and the EH&S Department. Employees should be informed of client's site-specific contingency and/or emergency plan provisions prior to working.

Employees that are required to work at locations that contain or may contain H2S will be trained and are required to take an annual refresher course. H2S training must be instructor led for a minimum of 3.5 hours. Records of training shall be maintained by the HSE Department. Training shall consist of the following topics:

- Chemical and Physical Properties of H2S
- Sources of H2S
- Signs and Symptoms of H2S, Acute and Chronic Toxicity
- Wind Direction and Routes of Egress
- First aid for H2S victims
- How to perform and document a bump test

- Safe Work Procedures
- PPE Required When Working Around H2S
- Use of Contingency Plans and Emergency Response
- Job Hazards
- Proper use, maintenance, and calibration of H2S detectors and monitoring equipment

LEAD AWARENESS

May 1, 2020

This safety guideline is intended to provide suitable information to all employees regarding the potential effects of Lead and where lead may be found so that adequate measures can be taken to limit exposures through controls in the workplace.

General

The objective of this guideline is to prevent absorption of harmful quantities of lead. The guideline is intended to protect employees from the immediate toxic effects of lead and from the serious toxic effects that may not become apparent until years of exposure have passed.

Characteristics and where it can be found

To understand why lead is so hazardous, it is important to know what it is, the hazardous effects on people, and which materials do or may contain lead. Once this is understood, employees will gain a respect for the safety guidelines set forth in this policy.

What Is It?

Pure lead (Pb) is a heavy metal and is a basic chemical element. It can combine with various other substances to form numerous lead compounds.

Lead can be found in:

- Old glossy paints used on walls and pipe.
- Building and roof metal support frames.

Report to the Contracting Company's Project Manager anytime you suspect lead-containing materials that may not have been disclosed:

- Cracked or pealing paint,
- Visible paint dust, grindings, or shavings.

Health Effects:

I. Ways in which lead enters your body.

Lead can be absorbed into your body by inhalation (breathing) and ingestion (eating). When lead is scattered in the air it can be inhaled and absorbed through your lungs and upper respiratory tract. Inhalation of airborne lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed.

Hazards encountered with lead occur when:

- Inhaling lead as a dust, fume or mist.
- Ingesting lead through food, cigarettes, and chewing tobacco when handled with contaminated hands.

Lead (except for certain organic lead compounds not covered by the standard, such as tetraethyl lead) is not absorbed through your skin. When lead is scattered in the air as a dust, fume or mist it can be inhaled and absorbed through your lungs and upper respiratory tract. Inhalation of airborne

lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed. If you handle food, cigarettes, chewing tobacco, or make-up, which have lead on them or handle them with hands contaminated with lead, this will contribute to ingestion.

A significant portion of the lead that you inhale or ingest gets into your blood stream. Once in your blood system, lead is circulated throughout your body and stored in various organs and body tissues. Some of this lead is quickly filtered out of your body and excreted, but some remains in the blood and other tissues. As exposure to lead continues, the amount stored in your body will increase if you are absorbing more lead than your body is excreting. Even though you may not be aware of any immediate symptoms of disease, this lead stored in your tissues can be slowly causing irreversible damage, first to individual cells, then to your organs and whole body systems.

II. Effects of overexposure to lead -

(1) Short-term (acute) overexposure.

Lead is a potent, systemic poison that serves no known useful function once absorbed by your body. Taken in large enough doses, lead can kill you in a matter of days. A condition affecting the brain called acute encephalopathy may arise which develops quickly to seizures, coma, and death from cardiorespiratory arrest. A short-term dose of lead can lead to acute encephalopathy. Short-term occupational exposures of this magnitude are highly unusual, but not impossible. Similar forms of encephalopathy may, however, arise from extended, chronic exposure to lower doses of lead. There is no sharp dividing line between rapidly developing acute effects of lead and chronic effects, which take longer to acquire. Lead adversely affects numerous body systems and causes forms of health impairment and disease which arise after periods of exposure as short as days or as long as several years.

(2) Long-term (chronic) overexposure.

Chronic overexposure to lead may result in severe damage to your blood-forming, nervous, urinary and reproductive systems. Some common symptoms of chronic overexposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, pallor, excessive tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain or soreness, fine tremors, numbness, dizziness, hyperactivity and colic. In lead colic there may be severe abdominal pain.

Damage to the central nervous system in general and the brain (encephalopathy) in particular is one of the most severe forms of lead poisoning. The most severe, often fatal, form of encephalopathy may be preceded by vomiting, a feeling of dullness progressing to drowsiness and stupor, poor memory, restlessness, irritability, tremor, and convulsions. It may arise suddenly with the onset of seizures, followed by coma, and death. There is a tendency for muscular weakness to develop at the same time. This weakness may progress to paralysis often observed as a characteristic "wrist drop" or "foot drop" and is a manifestation of a disease to the nervous system called peripheral neuropathy.

Chronic overexposure to lead also results in kidney disease with few, if any, symptoms appearing until extensive and most likely permanent kidney damage has occurred. Routine laboratory tests reveal the presence of this kidney disease only after about two-thirds of kidney function is lost. When overt symptoms of urinary dysfunction arise, it is often too late to correct or prevent worsening conditions, and progression to kidney dialysis or death is possible.

Chronic overexposure to lead impairs the reproductive systems of both men and women. Overexposure to lead may result in decreased sex drive, impotence and sterility in men. Lead can alter the structure of sperm cells raising the risk of birth defects. There is evidence of miscarriage and stillbirth in women whose husbands were exposed to lead or who were exposed to lead themselves. Lead exposure also may result in decreased fertility and abnormal menstrual cycles in women. The course of pregnancy may be adversely affected by exposure to lead since lead crosses the placental barrier and poses risks to developing fetuses. Children born of parents either one of whom were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood.

Overexposure to lead also disrupts the blood-forming system resulting in decreased hemoglobin (the substance in the blood that carries oxygen to the cells) and ultimately anemia. Anemia is characterized by weakness, pallor and fatigue as a result of decreased oxygen-carrying capacity in the blood.

PROCEDURES:

Permissible Exposure Limit (PEL)

The current Cal/OSHA lead standard is $50 \,\mu\text{g/m}^3$ as an 8-hour Time Weighted Average (TWA). The standard as it applies to construction is unique in that it groups tasks **presumed** to create employee exposures above the PEL of $50 \,\mu\text{g/m}^3$ as an 8-hour TWA, as follows:

> 50 to 500 μg/m ³	> 500 μg/m ³ to 2,500 μg/m ³	> 2,500 μg/m³
Manual demolition	Using lead-containing mortar	Abrasive blasting
Dry manual scraping	Lead burning	Welding
Dry manual sanding	Rivet busting	Torch cutting
Heat gun use	Power tool cleaning without dust detection systems	Torch burning
Power tool cleaning with dust collection systems	Cleanup of dry expendable abrasive blasting jobs	
Spray painting with lead paint	Abrasive blasting enclosure movement and removal	

LEAD-RELATED CONSTRUCTION TASKS AND THEIR 8-HOUR TWA EXPOSURE LEVELS

Action Level

The standard also establishes an action level of 30 micrograms per cubic meter of air (30 μ g/m³), timeweighted average, based on an 8-hour workday. The action level initiates several requirements of the standard, such as exposure monitoring, medical surveillance, and training and education.

Evaluation Process

The Contracting Company's Project Manager will provide employees with results of any evaluation processes and a listing of lead containing material. The Contracting Company will provide all precautions and render the area safe for IPM employees before work begins.

SAFETY MEASURES:

Employees are not permitted to work in areas where there may be a potential for Lead exposure. If it is necessary to perform any work where the exposure to Lead is about the acceptable limits, then must implement a comprehensive mandated safety policy and procedure that includes special elements of exposure monitoring, formal medical program, special personal protective equipment, and much more.

Below are listed possible work controls and practices:

1. WELDING, BURNING, AND TORCH CUTTING.

Welding and cutting activities that potentially involve exposure to lead can occur as part of a number of construction projects such as highway/railroad bridge rehabilitation (including elevated masstransit lines), demolition, and indoor and outdoor industrial facility maintenance and renovation. Lead exposures are generated when a piece of lead-based painted steel is heated to its melting point either by an oxyacetylene torch or an arc welder. In this situation, lead becomes airborne as a volatilized component of the coating.

The amount of time a worker may spend actually welding or cutting can vary from only a few minutes up to a full shift. In addition, the coating being worked on may consist of several layers of lead-based paint, each of which could contain as much as 50% lead. Taken together, these factors suggest that a worker's exposure to airborne lead during welding or cutting activities can vary widely and may be exceedingly high. Lead burning, a process by which virgin or alloyed lead is melted with a torch or otherwise fused to another lead object, is typically performed in maintenance operations on electrostatic precipitators or during the installation of lead shot, bricks, or sheets in the walls or floors of health-care x-ray units or industrial sites. Lead health hazards in this operation, as in welding and torch cutting, are from lead that is superheated and released into the worker's breathing zone in the form of a fume.

- Engineering Controls. The engineering controls that can be used, depending on feasibility, are:
 - Local exhaust ventilation (LEV) that has a flanged hood and is equipped with HEPA filtration may be appropriate where the use of LEV does not create safety hazards. Use of a flexible duct system requires that the welder be instructed to keep the duct close to the emission source and to ensure the duct is not twisted or bent.
 - A fume-extractor gun that removes fumes from the point of generation is an alternative to an exhaust hood for gas-shielded arc-welding processes. Such extraction systems can reduce breathing zone concentrations by 70% or more. These systems require that the gun and shielding gas flow rates be carefully balanced to maintain weld quality and still provide good exhaust flow.
 - A longer cutting torch can be used in some situations to increase the distance from the lead source to the worker's breathing zone.
 - Hydraulic shears can sometimes be used to mechanically cut steel that is coated with lead based-paint. The use of this method is limited by the ability of the shears to reach the cutting area.
 - Whenever possible, pneumatic air tools should be used to remove rivets in lieu of burning and torch cutting.

- Work Practice Controls. The following work practice controls will help to reduce worker exposures to lead during welding, burning, and torch cutting:
 - Strip back all lead-based paint for a distance of at least 4 inches in all directions from the area of heat application. Chemical stripping, vacuum-shrouded hand tools, vacuum blasting, or other suitable method may be used. However, in enclosed spaces, strip back or protect the workers with air-line respirators.
 - Ensure that workers avoid the smoke plume by standing to the side or upwind of the cutting torch whenever the configuration of the job permits.
 - Prohibit burning to remove lead-based paint. Paint should be removed using other methods, such as chemical stripping, power tools (e.g. needle guns) with vacuum attachments, etc.

2. MANUAL SCRAPING AND SANDING OF LEAD-BASED PAINTS.

Hand scraping of lead-based paints involves the use of a hand-held scraping tool to remove paint from coated surfaces. The health hazards in this activity are caused by the lead dust and paint chips produced in the scraping process. Hand sanding can also produce excessive dust. These activities are typically performed during residential and commercial/institutional lead abatement projects.

- Engineering and Work Practice Controls. Controls that employers can implement to protect workers performing scraping and sanding of lead-based paints are:
 - Use of wet-sanding and wet-scraping methods in conjunction with HEPA vacuuming or HEPA mechanical ventilation. Wet methods include misting of peeling paint with water before scraping, and sanding and misting of debris prior to sweeping or vacuuming.
 - Use of shrouded power tools with HEPA vacuum attachments. The shroud must be kept flush with the surface.
 - Use of techniques with known low exposure potential, such as encapsulation and removal or replacement instead of hand scraping and hand sanding.

Regulated Areas:

The Contracting Company will ensure a work plan is designed and implemented that will:

- Eliminate lead dust or fumes from exposing both work personnel and building occupants.
- Ensure that unauthorized persons cannot access the area.
- Use of signage warning signs shall be provided and displayed at each regulated area, and is posted at all approaches to regulated areas.

Training:

All employees will be provided awareness training in this program in order to be familiar with the potential hazards and proper safe work procedures to follow if exposed to this health hazard.

Training and information will be provided for all employees exposed to lead at or above the action level, or who may suffer skin or eye irritation from lead. The training will inform exposed employees of:

- Specific hazards associated with their work environment,
- Protective measures which can be taken,

- Danger of lead to their bodies (including their reproductive systems), and
- Their rights under the standard.

January 13, 2021

Percheron's normal scope of work does not include the use of any hazardous chemicals/materials other than the possible use of normal household/commercial office cleaning supplies, computer printer/copier inks/toners and spray paints which are to be used and stored in a manner consistent with the manufacturer's guidelines and shall remain in the manufacturer's container with original labeling. Labels on any chemicals/materials shall not be removed or defaced. A site-specific listing of hazardous chemicals (with their Safety Data Sheets - SDS) shall be added to the appendices of the Percheron Safety Program which shall be developed, implemented, and maintained by the appropriate level of local management who has full authority for its execution. Note that a blank listing is unacceptable; while a listing containing "no hazardous chemicals on-site" is acceptable if that is the case. Employees and contractors will be provided site specific hazardous chemical information on all worksites or employer worksites. A sign will be posted at the storage location of these chemicals/materials (if any) directing all employees, visitors, and others to the employee-accessible location of the site-specific listing which shall contain SDS and any precautions necessary for the safe use of such chemicals/materials which are to be made available upon request. Information regarding hazardous materials shall be made available in English and, for non-English speaking employees, their language as well.

If an employee or crew is required to work in an area where there may be exposure to known toxic substances or other harmful physical agents, all members of the crew will be actively involved in the hazard identification process. All employees will be advised of the known toxic substance or harmful physical agents and identified hazards. All employees shall be required to participate in the development of Job Safety Analysis (JSA) which identifies the hazards and techniques to mitigate the hazard. No work shall be performed in that area, except by properly trained and authorized employees with proper safety equipment/PPE and until a JSA is complete. In addition to the JSA, a Risk Analysis Matrix (RAM) shall be used to effectively classify and prioritize the risks associated with the tasks to be performed and the probability and severity of the hazard.

Each affected employee shall demonstrate an understanding and the ability to use PPE properly and care for PPE, before being allowed to perform work requiring the use of PPE. If Percheron has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph of this section, Percheron shall retrain such employee.

Where the eyes or body of any person may be exposed to injurious or corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use. Designated employees shall receive appropriate training and information prior to working in any of these areas.

Employees shall be provided with effective information and training on the Percheron Safety Program, the hazard identification and risk assessment process, and hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area, and then annually. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets. SDS are available from manufacturers, distributors, and vendors, and their respective Web sites.

OSHA Hazard Communication Standard Pictograms which may be found in Hazard Communications (any found in Percheron workplaces would be expected to be in the "Exclamation Mark" category primarily as mild irritants):

Health Hazard	Flame	Exclamation Mark
Carcinogen Carcinogen Mutagenicity Reproductive Toxicity Respiratory Sensitizer Target Organ Toxicity Assiration Toxicity	 Flammables Pyrophorics Self-Heating Emits Flammable Gas Self-Reactives Organic Perovides 	• Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity • Narcotic Effects • Respiratory Tract Irritant
	- organic retoxides	(Non-Mandatory)
Gas Cylinder	Corrosion	Exploding Bomb
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Gases Under Pressure	 Skin Corrosion/Burns Eye Damage Corrosive to Metals 	ExplosivesSelf-ReactivesOrganic Peroxides
Flame Over Circle	Environment (Non-Mandatory)	Skull and Crossbones
Oxidizers	Aquatic Toxicity	Acute Toxicity (fatal or toxic)

SUBPART Q – WORKPLACE SECURITY, VIOLENCE AND DISCIPLINARY ACTIONS

JOBSITE SECURITY

August 1, 2019

Percheron, LLC is committed to providing safe and secure working conditions at all jobsites for employees. Prior to performing work for a client, a common jobsite security risk assessment should be performed by management. Employees should assess each jobsite and discuss the possible security issues identified and the control measures in place during a pre-job meeting. Employees may document security issues and control measures in place on Job Safety Analysis (JSA). Percheron employees are required to report any actual or suspected unlawful or unauthorized activity regardless of whether a loss has occurred. Unlawful or unauthorized activity may include but is not limited to:

- Arson
- Breaking and entering
- Conflict of Interest
- Dangerous weapons on the property
- Extortion
- Fraud
- Homicide
- Inventory Shortage or Manipulation

- Assault and/or Battery
- Commercial Bribery
- Electronic Surveillance
- Theft
- Forgery
- Unauthorized use of company property
- Vandalism
- Possession, use or sale of dangerous drugs

Control measures to reduce or eliminate security incidents may include but are not limited to:

- Posted Signage
- Locked Doors
- Security Cameras
- Fencing
- Personal Protective Devices
- Background Checks

- Restricted Access to Work Areas
- Keycards
- Alarms
- Lighting
- Security Guards
- Time-lock safes and other robbery prevention Measures

All jobsite security observations, security breaches and/or incidents will be reported immediately to a manager or supervisor and complete an Incident form found in Appendix A to this Safety Program. If the incident occurred at a client site, the client should be notified immediately by the Manager or Supervisor. It is the policy of Percheron to investigate all security breaches and/or incidents. Security breaches and/or incidents will be investigated to the appropriate level depending on the severity of the incident. The goal of the investigation is to identify root causes and take corrective action to reduce the potential for future incidents.

Percheron employees must be trained on the incident policies and procedures to prevent security incidents. At a minimum Training should include the following topics:
- Recognizing common jobsite security issues
- Appropriate responses (including how to obtain assistance)
- Procedures for reporting, investigating and documenting security incidents.

Retraining shall be provided any time these policies or procedures are changed or updated.

SAFETY VIOLATIONS AND DISCIPLINARY ACTIONS

A safe work environment is the responsibility of each and every Percheron employee as an individual and as a member of a team. Each employee must follow safety practices and procedures, render every possible aid to safe operations, and report all unsafe conditions or practices to the appropriate level of management. We are all the eyes and ears of the Percheron Safety Program.

Any failure to adhere to safe practices will be considered a safety violation and could subject the employee to disciplinary action. Some examples of such failures are (but are not limited to): not following written or verbal safety procedures, guidelines, or rules; engaging in horseplay; failure to wear PPE; abuse of PPE; an overall lack of commitment to the Percheron Safety Program; etc. Any employee engaging in unsafe behavior or activities, or violating the provisions contained in the Percheron Safety Program will be subject to receiving warnings from management. Copies of all warnings issued to employees will be maintained in the employee's employment file. A copy of the Employee Warning Notice can be found in the Appendix.

Failure to improve performance will result in additional warnings being issued to the employee. Documented warnings shall be issued in the following sequence: verbal, first written warning, second written warning, and final warning. Upon the issuance of a Warning Notice, management will meet with the employee for discussion and determination of corrective action, the employee will receive additional training, and the employee and management will review the appropriate topics in the Percheron Safety Program, with references to specific applicable Codes of Safe Practice as necessary.

Following the issuance of a final warning, a subsequent infraction of the Safety Program is punishable by means up to and including termination of employment. Area Supervisors, Departmental Supervisors, Project Managers, and the Percheron Safety Committee shall have the authority to issue Employee Warnings and enforce the disciplinary policies of the Safety Program. Notice of any issued warning should immediately be sent to Justin Lyon, Managing Partner, Safety and Integrated Services, in the Katy, TX Office. Disciplinary actions will be determined jointly by Project Managers and the VP, Safety Programs.

WORKPLACE VIOLENCE AND DISCIPLINARY ACTIONS

November 11, 2020

Workplace violence can be any act of physical violence, threats of physical violence, harassment, or intimidation that occurs in the workplace. Workplace violence has the potential to affect or involve employees, visitors and other individuals. The Management and Executive Staff of Percheron, LLC will not accept or tolerate any form of violence or intimidation by or against any employee in the workplace. Percheron seeks to provide a safe workplace for all employees, but it is up to each employee to help make a safe workplace. Each employee is expected to treat all other employees, clients, landowners and other individuals they encounter during the course of their duties with respect and dignity.

Often, the nature of the work performed by Percheron and its agents necessitates individuals working alone, traveling alone, and routinely attending meetings in private residences or other locations unfamiliar to them with individuals or groups they are not familiar with. Under these circumstances, agents are encouraged to prepare a daily work plan and keep their supervisor or field office informed of their location and schedule throughout the day. Agents should maintain their awareness about their surroundings and the demeanor of the other individuals in meetings in remote locations or with individuals not known to them.

If at any time agents encounter locations, circumstances or individuals that appear to pose a threat to their safety they should attempt to diffuse any potentially violent situation and leave the area immediately. Any incident that has the potential to result in violence, bodily harm or injury should be reported to local authorities immediately. Agents should report any and all incidents to their supervisor immediately. Supervisors and management will review and investigate any incidents and develop a strategy for addressing each incident appropriately.

PERCHERON PROJECT VIOLENCE RESPONSE PLAN

Any threats of violence against Percheron staff, clients, or other project team members should be taken seriously and reported to Project Management and HSE immediately. The following plan outlines the actions to be taken in the event of a threat or act of violence against a Percheron team member or other member of a project team.

If you are involved in or witness a situation where an act of violence is threatened or occurs, leave the area immediately. Do not antagonize the individual(s) or attempt to continue interacting with anyone related to the threats. If an imminent threat to life or property occurs, call 911 immediately.

In all cases, as soon as it is safe to do so, any other project personnel, including Percheron personnel, in the area should be alerted to the threat and advised to leave the area. The Percheron Project Manager and HSE Manager should be notified as promptly as is safely possible to do so. The client and members of survey crews, environmental crews, construction crews and others should be immediately alerted.

After immediate notification of all project personnel in the area, the remaining Percheron personnel on the project should be alerted to the situation and advised to avoid the area and or specific individual(s) as necessary. A formal written incident report should also be submitted. This can be done thru the Incident Report Form attached here to or via Teams at Incident Report Form

Percheron Project Manager and other Management, including HSE, should coordinate with the GIS Department to locate any other properties in the project area the individual(s) involved in the event may have an interest. These properties should be mapped and identified as "Do Not Enter – Do Not Contact". This should be noted thru visual aspect of the GRID or other mapping function and also noted in the project database. Agent notes should reflect a detailed accounting of the incident.

Upon completion of identifying all additional lands, all information related to the incident should be compiled into an Incident Alert Form. A template of this form is attached to this plan. This Incident Alert Form should be used as a guideline to conduct a Safety Stand Down for <u>all Percheron staff on the project</u>. A meeting roster documenting the time, date, place, topic and attendance should be completed and submitted to the HSE Department along with the Incident Report Form. A meeting roster template is attached to this plan. The Incident Alert Form should also be shared with the client and any non-Percheron team members on the project (third party surveyors, environmental, construction, etc). The Incident Alert Form should be posted in a conspicuous location within the project office as an ongoing reminder of the incident and the instruction to avoid contact with the individual(s) and lands they are connected to.

Percheron Project Violence Response Plan - Action Item Summary

- Leave the area Immediately
- Call 9-1-1 if immediate to threat to life or property exists
- Alert Others
 - Alert other project personnel of the danger, this may include surveyors, engineers, environmental crews, construction crews, right of way agents, etc.
 - Notify Percheron project manager and Percheron HSE
- Complete Percheron Incident Report
- Observe and follow any Client Protocols
- All parcels or locations associated with the individual that threatened violence should be marked as Do Not Enter – Do not Contact on project maps, agent notes, status reports, and any other project communications
- Agent Notes for ROW staff should be updated with accurate report of incident and indicate Do Not Enter Do Not Contact
- Complete Incident Alert form and use as a guide for a safety stand down meeting. Attached meeting roster should be signed by all attendees.

Question or concerns about this plan should be addressed to:

Justin Lyon Managing Partner, Safety and Integrated Services (832) 300-6430 Office Direct (832) 300-6400 Office Main (979) 578-6383 Cell Justin.lyon@percheronllc.com



"Safety Brings US Home"

EMPLOYEE ACCIDENT REPORT

EMPLOYEE INFORMATION		ACCIDENT INFORMATION	
NAME		DATE	
AGE		TIME	
SSN #		LOCATION	
POSITION		WITNESS	

DESCRIBE WHAT HAPPENED IN DETAIL INCLUDING NAMES AND LOCATIONS

DESCRIBE ALL INJURIES IN DETAIL INCLUDING ANY PART OF THE BODY EFFECTED

NAME AND ADDRESS OF PHYSICIAN SEEN	IF APPLICABLE, NAME AND ADDRESS OF
	HOSPITAL
COMMENTS FROM WITNESS	DATE/TIME AND PERSON INCIDENT WAS
	REPORTED TO

WORK STATUS		
DID THE EMPLOYEE RETURN TO WORK THAT DAY? IF SO, AT WHAT TIME?	YES	NO
IF NO, WHEN WAS THE DATE AND TIME THEY RETURNED?		

EMPLOYEE		
SIGNATURE	DATE	
SUPERVISOR		
SIGNATURE	DATE	

PERCHERON	Incide Alert	nt t	HSE SQ Motor Vehicle	PERCHERON "Safety Brings US Home"
	Title			
Description			Corrective Action	
What Happened: Point 1 		Corrective Act Describe in de incident that c	ion: tail the actions taken to preve occurred	nt or correct the
• Point 2		1. 2. 3.		
 Point 3 *Include photos where possible 		5. 6.		
How did it happen: Description what caused the incident				
 Why did it happen: Point 1 Point 2 				

SUBPART R - SUBCONTRACTOR MANAGEMENT

SUBCONTRACTOR MANAGEMENT PROGRAM

March 20, 2023

Purpose

The purpose of this program is to ensure that Percheron 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 locations.

General Requirements

All Percheron subcontractors are to be managed in accordance with this program. Subcontractors performing services for Percheron LLC are required to subscribe to ISNetworld, Percheron's primary subcontractor information management system. Subcontractors must be approved by Percheron and the client before commencing work.

When requested, the subcontractor will report through ISNetworld details relating to the following, as applicable:

- Safety statistics
 - employee hours
 - number of employees
 - first aid/non-recordable injuries
 - other recordable injuries; job transfer/restricted injuries
 - days away from work injuries
 - fatalities
 - citations
 - EMR
 - TRIR
- HSE Questionnaire(s) posted through ISNetworld
- Provide safety training documentation
- Safety and Drug & Alcohol Written Programs, policies and procedures
- Certificate of Insurance
- Operator Qualifications (OQ) if applicable

Approval requirements include:

- A formal safety review of the subcontractor performed by ISNetworld according to set Percheron/client/industry/regulatory standards.
- The scope of the review will be commensurate with the hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations, and requirements of Percheron and the client.

• 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 by Percheron, the client or in ISNetworld will not be used by Percheron.

Procedure

Pre-Qualification of Subcontractors

Subcontractors will be required to join ISNetworld and undergo a pre-qualification assessment 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:

- Percheron EHS Questionnaire 15 Points
- Serious Injury Cases (SIFs) 5 Points
- Total Recordable Incident Rate (TRIR) 25 Points
- Fatalities *Negative* 100 Points if a fatality is reported and/or information is not available.
- Citations 10 Points
- Experience Modifier 10 Points
- Written Program Review 35 Points
- Insurance *Negative* 100 Points if not submitted, rejected, not reviewed, expired, and/or missing a requirement

Evaluation Rating and Acceptance

The subcontractor rating system will have five designations:

- 1. Equal to or Greater than 90 points = A Recommended for Use
- 2. Between 80 and 89.99 points = B Acceptable for Use
- 3. Between 65 and 79.99 = C Contractor does not meet all requirements. Percheron Safety Management approval required for use with Mitigation plan documented and submitted by the subcontractor in writing.
- 4. Between -200 and 64.99 = F Not to be used without Percheron Safety Management approval, mandatory safety commitment meeting with senior subcontractor management present; mitigation plan documented and submitted by the subcontractor in writing; and additional requirements as necessary.

Once each subcontractor has been evaluated and scored through ISNetworld, the Percheron HSE Department will provide management the scores/ranking. Subcontractors with Metrics above industry standards for their respective NAICs code may be excluded from performing services for Percheron.

Percheron and the client reserve 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.

Low-Risk Subcontractor Approval

Circumstances may allow for low-risk service providers to request exemption from subscribing to ISNetworld for the purpose of subcontractor management and approval. Approval for exemption must be granted by the Percheron HSE Department.

Low-risk service providers approved for exemption from subscribing to ISNetworld are required to undergo a comparable prequalification assessment conducted by the Percheron HSE Department. The prequalification assessment requires completing an internal HSE Questionnaire, review of safety programs, training documents, certificate of insurance, statistical data, and any other documentation as applicable, based on the scope of services provided by the subcontractor.

An acceptable safety metrics will be used as criteria for pre-qualifying and selecting subcontractors. Once each subcontractor has been evaluated, the Percheron HSE Department will provide management with the scores/ranking. Subcontractors with Metrics above industry standards for their respective NAICs code may be excluded from performing services for Percheron.

Any subcontractor that has a "Non-Approved" safety status by Percheron or the client will not be used.

Subcontractor Approval Process

Any Percheron Manager intending to use a subcontractor for any purpose, should contact the HSE Department promptly to verify the status of the proposed subcontractor or identify potential subcontractors for the proposed scope of services. Prior to commencing work, subcontractors will be verified and approved through the process identified in this policy. Any subcontractors failing to meet requirements will not be authorized for use. The Percheron HSE Department will notify the Percheron Accounting Department and Project Managers of the Subcontractor's status once prequalification assessments have completed. When a Subcontractor is approved for use, the HSE department will notify the Accounting Department to update their status in Vantagepoint.

Subcontractor Involvement

When applicable, subcontractors are required to follow or implement the work practices and systems described below while performing work with Percheron at client worksites:

- Attend a safety orientation, pre-job meeting or kick-off meeting provided by Percheron and/or the client prior to any work beginning.
- Monitor employees for substance abuse and report nonconformities to Percheron and the client.
- Ensure personnel have the required training and competency for their work.
- Participate in tailgate 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 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 safety performance reviews shall be conducted for subcontractors.



LOW RISK SUBCONTRACTOR SAFETY & HEALTHQUESTIONNAIRE

THIS FORM IS FOR LOW RISK SUBCONTRACTORS ONLY. ALL OTHERS ARE REQUIRED TO SUBSCRIBE TO ISNETWORLD.

Enter your data in cells that are highlighted in yellow.

For questions, please contact Percheron HSE - Justin.Lyon@percheronllc.com.

SECTION A: GENERAL COMPANY INFORMATION

Company Name:	Company NAICS Code:	
Project Name:	Location:	

Highest Ranking Safety Professional in the Company Contact Information:	Name:	Title:	
	Phone:	Email:	
	Fax:		

List the services that your company will provide:

	SECTION B: REQUIRED DOCUMENTATION					
#	Document Type	Save File As:	Document Provided (Y/N)	Comments		
1	Health, Safety & Environmental Manual/Written Programs	{YourCompanyName}_HSE1				
2	OSHA 300 & 300A Logs (Past 3 Years)	{YourCompanyName}_HSE2				
3	Experience Modification Rate (EMR) Letter	{YourCompanyName}_HSE3				
4	Certificate of Insurance (COI)	{YourCompanyName}_HSE4				
5	Drug & Alcohol Policy (DOT/Non-DOT)	{YourCompanyName}_HSE5				
6	D&A MIS Data for Previous and Current year if applicable	{YourCompanyName}_HSE6				
7	Current company W9 Form	{YourCompanyName}_HSE7				
8	Small Business Association (SBA) Certification *if applicable	{YourCompanyName}_HSE8				

	SECTION C: HEALTH SAFETY & ENVIRONMENT					
1.1 Are the	.1 Are their specific employees with the responsibility to Manage the HSE efforts?					
Name:	Title		Telephone:	Email:		
Name:	Title		Telephone:	Email:		
Name:	Title		Telephone:	Email:		

1.2 HSE General Questions

#	Questions	(Y/N)
1	Are job safety analysis performed daily by project staff?	
2	Does your company have a safety committee?	
3	How often does the safety committee meet?	
4	Is there a safety incentive program in place?	
5	Does the company use a medical case management company?	
6	Are all safety and health meetings documented?	
7	Is applicable PPE provided for your employees?	
8	Is PPE inspected and maintained?	

#	Questions	(Y/N)
9	Is there company paid safety training in place?	
10	Do you have a health and safety management system?	
11	Is the health and safety management system compliant?	
12	Is the health and safety management system certified?	
13	Do you conduct safety and health inspections?	
14	Do you conduct safety and health audits?	
15	Are corrections of deficiencies documented?	

17	Do you have personnel trained to perform first aid and CPR?		If yes, How many?	
10	Describe how you will provide first aid and other medical services for	r <mark>your</mark>	employees while on-site:	
TO				

Do your employees read, write and understand English so that they can perform job tasks safely without an interpreter? 19 - If no, provide a description of your plan to assure that they can safely perform their jobs.

1.3 H	.3 HSE Training										
1	Do you have a Safety & Health Orientation Program for new hires and newly hired or promoted supervisors?										
	Supervisors?			Types of Training Include:							
	Employees?			Types of Training Include:							

1.4 Does the HSE program include the following Key Elements?

#	Questions	(Y/N)
1	Management commitment and expectations?	
2	Employee participation	
3	Responsibilities of managers, supervisors and employees?	
4	Document control and record retention requirements?	
5	Resources for meeting safety and health requirements?	

#	Questions	(Y/N)
6	Hazard recognition and control?	
7	Annual safety goals identified?	
8	Emergency Protocols?	
9	Incident investigation, corrective/preventative action protocols?	
10	Resources for meeting safety and health requirements?	

1.5 D	1.5 Does the HSE program include work practices and procedures for the following?								
#	Written Programs	(Y/N)		#	Written Programs				
1	Accident/Incident Reporting			6	Back Injury Prevention				
2	Housekeeping			7	Emergency Preparedness - Including Evacuation Plan				
3	Injury and Illness Recording			8	Stop Work Authority				
4	Pandemic Preparedness			9	Unsafe Condition Reporting				
5	Personal Protective Equipment			23	Vehicle Driving Safety				

(Y/N)

SECTION D: ANNUAL SUMMARY - HSE KEY PERFORMANCE INDICATORS (KPI)										
1.1 Exposure Hours and Safety Statis	1.1 Exposure Hours and Safety Statistics									
Category	3 yrs prior to calendar yr	2 yrs prior to calendar yr	Previous calendar yr	Current calendar yr to	Average (w/out current calendar yr)	Remarks				
Fatalities (FAT)					0					
Lost Time Injuries (LTI)					0					
Away from work/Lost Time Days					0					
Restricted Work Cases (RWC)					0					
Recordable Injuries (RI)					0					
First Aid Cases (FAC)					0					
Near Misses (NM)					0					
Environmental Incidents (ENV)					0					
Annual Manhours (MH)					0					
Experience Modification Rate (EMR)					0					
Occupational Illness					0					
OSHA Citations					0					
Environmental Citations					0					
Days Away, Restricted or transferred (DART Rate)	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!					
Total Recordable Injury Rate (TRIR)	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!					
Lost Workday Rate (LWR)	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!					
Lost Time Incident Rate (LTIR)	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!					
Industry TRIR - NAICS/www.bls.gov										

1.2 Vehicle Mileage and Incidents									
Annual Company Non DOT Mileago Total:	3 Years Prior to Calendar Year	2 Years Prior to Calendar Year	Previous Calendar Year	Current Calendar Year					
Annual company Non-DOT Mileage Total.									
Annual Number of Vehicle Related Incident									

SECTION E: ENVIRONMENTAL SOCIAL & GOVERNANCE

1.1 Environmental General Questions

#	Questions	(Y/N)
1	Does your company have a written environmental policy?	
ſ	Has your company received any fines due to Environmental Non-	
Z	compliance within the last two years?	
	Has your company been responsible for any spills? If yes, please	
С	provide and explanation in the space below.	
5		

#	Questions	(Y/N)
4	Does your company have an ESG Program in place?	
5		
	Does your company measure/track sustainability KPIs annually?	
6		
	Does your company have a sustainability report?	

SECTION F: EMPLOYEE BACKGROUND SCREENING

(Y/N)

1.1 Background Screening and Motor Vehicle Records

#	Question
1	Are background checks performed, reviewed and approved for all
	staff?

Question

3 Are MVRs reviewed at a minimum annually?

2 Do you check for felony charges on all employees?

SECTION G: DOT & NON-DOT SUBSTANCE ABUSE PROGRAM

1.1 [Drugs and Alcohol				
#	Question	(Y/N)	#	Question	(Y/N)
1	Do you have a NON-DOT substance abuse program?		5	Does it include For Cause/Reasonable Suspicion Testing?	
2	Does it include Pre-Employment Testing?		6	Is your company Zero-Tolerance?	
3	Does it include Random Testing?		7	Or do employees that test positive go through rehabilitation before	
4	What percent are employees randomly tested annually?		/	returning to work?	

Please list the D&A third party administrator (TPA) your company uses? (ex: TEAMS Professional Services, Pipeline Testing Consortium, AWSI, DISA..)

9

SECTION H: FINANCIAL INFORMATION									
1.1 General Information									
Tax ID:	Duns & E	Duns & Bradstreet Rating:							
1.2 Banking Info	mation								
Name of Bank:	Location		Contact:						
Name of Bank:		ocation:							
Name of Bank:			Contact:						

1.4 9	1.4 Small Disadvantage, Minority Owned Business						
1	Are you certified as a small business?			6	Are you certified as a HUB Zone Business?		
2	Are you certified as a small disadvantaged business?			7	Are you certified as a Vetreran Owned Business?		
3	Are you certified as a woman owned business?			8	Are you certified as a 8(a)?		
4	Are you certified as a Service Disabled Vetran Owned Business	?		9	Are you certified as a HBCU or Minority Institution?		
5	Are you certified as an Alasaka-Native Owned Business?			10	Are you certified as a Minority Owned Business?		

SECTION I: WORK PERFORMANCE AND INTEGRITY

1.1 Performance and Integrity

(Y/N)

1	Are there any judgments, claims, suits pending against you?	If yes, please explain:	
2	Are you currently or have you ever been involved in bankruptcy or reorganization proceedings?	If yes, please explain:	
3	Has the applicant, or any principal, officer, director, or member of applicant been convicted, or received a citation, under any state or federal antitrust statutes?	If yes, please explain:	
4	Has the applicant, or any principal, officer, director, or member of applicant, been convicted of a criminal offense as an incident in obtaining or attempting to obtain a public or private contract, or in the performance of such contract?	If yes, please explain:	
5	Has the applicant, or any principal, officer, director, or member of applicant, been convicted under state or federal statutes of embezzlement, theft, forgery, bribery, falsification or destruction of records, receiving stolen property or any other offense indicating a lack of business integrity or business honesty?	If yes, please explain:	
6	Has the business license, or construction contractor's license of any applicant's firm, or any firm with which any applicant principal, officer, director, or member was previously associated, been revoked within the last 5 years?	If yes, please explain:	

	SECTION J: INVOICING REQUIREMENTS							
1.1 I	1.1 In order to provide for the timely and efficient receipt of payment please ensure that all invoices contain the following information:							
1	Subcontractor Name			7	Client Name	Client Name		
2	2 Address		8	Project Name				
3	3 Phone Number		9	AFE/PO Number				
4	4 Email address of accounts payable contact			10	Project Location			
5	Tax ID) Number		11	1 Percheron contact requesting work			
6	Detail	led description of what the invoic	ce is for and include any supporting		Invoices Mail to: 1904 W. Grand Pkwy N, Ste 200, Katy, TX 77449 or			
0	information or documentation				Email to: percheronllc_invoicecapture@concursolutions.com			
			SECTION K: SUBCONTRACTOR	QUE	STIONNAIR AND RFI CO	ONTACTS		
Indiv	Individual that completed the subcontractor questionnaire:							
Name: Title:			Telephone: Email:					
Cont	act Info	ormation for the RFI:						
Nam	e:	Т	Fitle:		Telephone:	Email:		



APPENDIX I - EMPLOYEE ACKNOWLEDGMENT

ACKNOWLEDGMENT OF RECEIPT AND COMPREHENSION OF THE PERCHERON SAFETY PROGRAM AND MANUAL

I, ______, acknowledge receipt of the Percheron, LLC Safety Program. I understand the information contained in the Company Safety Manual represents guidelines only, and that the Company has the right to modify or terminate this Program, or any policy, procedure, rule, and/or regulation at its discretion.

I further understand this Manual is not a contract of any kind between the Company and me, and that I shall not view it as such.

I further acknowledge that I have received, read, and understand the contents of this Manual and will abide by the policies, procedures, rules, and/or regulations outlined, and described, in this Manual.

I further understand that my failure to abide by the policies, procedures, rules, and/or regulations outlined, and described, in this Manual could result in disciplinary action up to and including termination.

PRINTED NAME OF EMPLOYEE

SIGNATURE OF EMPLOYEE

DATE

APPENDIX II – COMMONLY USED FORMS

Percheron- Snapshot of HSE Forms

APPX II-1

EMPLOYEE ACCIDENT REPORT

EMPLOYEE INFORMATION	ACCIDENT INFORMATION			
NAME	DATE			
AGE	TIME			
SS #	LOCATION			
POSITION	WITNESS			

DESCRIBE WHAT HAPPENED IN DETAIL INCLUDING TIMES AND LOCATIONS						
DESCRIBE ALL INJURIES IN DETAIL INCLUDING ANY PART OF THE BODY EFFECTED						
NAME AND ADDRESS OF PHYSICIAN SEEN	IF APPLICABLE, NAME & ADDRESS OF HOSPITAL					
COMMENTS FROM WITNESSES DATE/TIME AND PERSON INCIDENT WAS REPORTED TO:						

WORK STATUS		
Did the employee return to work that day? If so, at what time?	YES	NO
If no, when was the day and time they returned?		

EMPLOYEE		
SIGNATURE	DATE	
SUPERVISOR		
SIGNATURE	DATE	





Employee Warning Notice:

	Employee Inform	uation			1912 197
Employee Name:		Date:			
location:		Job Title:			
Manageri		Department:			
	Type of Warni	ing			
Verbal Warning Pirst W	aming		Second Warni	ing 🗌 Fina	d Warning
Type of Oth	onse (Please ohe	ok all that apply	<i>i</i>)		
Tardiness/Leaving Early Absent	eeism.		Violation of C	ompony Policies	,
Substandard Work Violati	on of Safety Rule	s 🗆	Rudeness to C	lients/Cowerker	s/Other
□ Other:		_	-		
	Details				
Description of Infraction:					
Plan for Improvement:					
Consequences of Further Infractions:					
Consequences of Further Infractions:					
Consequences of Further Infractions:	loonsist of Peo	dut of Womin			
Consequences of Further Infractions: Acknowled	Jgement of Rece	ipt of Warnin;	ŝ		
Consequences of Further Infractions: Acknowled By signing this form, you confirm that you understand the discussed the warning and a plan for improvement. Signin	Igement of Reco Information in th Ing this form does i	elpt of Warning is warming. You a not necessarily it	2 also confirm that you ago	ou and your man ree with this war	ager have
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Hazard Assessment Form

Date:	
Project:	
Location:	
Project Type:	
Location of Hazard Assessment Review	v (specific jobsite):
Specify Types of Hazards Identified:	
Pipelines	Hazardous / Flammable Materials
Buried	Moving / Operating Equipment / Machinery
Above Ground	Environmental / Climatic
Overhead Electric Lines	Potential falling / flying objects
Noise Levels	Traffic Hazards at road crossings
	 Other (describe below)
Detailed des	scription of potential hazards identified:
Completed by:	Date:

Inventory List

EMPLOYEE: Your Name Goes Here !	DATE FILLED OUT :	Wednesday, December 20, 2017	ATTENTION: YOUR CURRENT PROJECT ADDRES: EMAIL RESPONES WITH THE INVENTORY AS V	S PUT IT IN YOUR VELL AS HERE	PERCHERON
COMPANY TRUCK YEAR, MAKE, AND MODEL	COMPANY TRUCK NUMBER	LICENSE PLATE NUMBER	GAS CARD NO. (SEE TAB BELOW)	EXPIRATION DATE	COMMENTS ABOUT TRUCK OR GAS CARD CONDITION
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XXXX-XXXX	(SEE THE NEXT TAB THIS DOCUMENT)	XX/XX	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
COMPANY LAPTOP MODEL	•	PERCHERON SERVICE TAG NUMBER (SEE TAB BELOW COLOR CODED)		COMMENTS FO	R IT ABOUT LAPTOP
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		XXXXXXXXX	XXXXXXXXXXXXX
COMPANY CELL PHONE NUMBE	R	COMPANY MIFI OR H	IOTSPOT NUMBER		COMMENTS
XXX-XXX-XXXX		XXX-XXX	-XXXX		XXXXXXXXXXXXXXXXXXXXXXX
ITEM DESCRIPTION	SERIAL NUMBER	DESCRIPTION	BRAND AND MODEL	QUANITIY	MISC. COMMENTS AND CONDITION REMARKS
GPS BASE UNIT					
GPS ROVER UNIT					
GPS DATA COLLECTOR					
GPS RADIO					
GPS FIXED HEIGHT BASE TRIPOD (TWO METER)	NOT APPLICABLE				
GPS ROVER BATTERIES	NOT APPLICABLE				
GPS TWO METER POLE (OR ADJUSTABLE ROVER POLE)	NOT APPLICABLE				
GPS DEEP CELL BATTERY (NOTE BRAND AND EXPIRATION DATE)					
12V BATTERY CHARGER					
CONVENTIONAL TOTAL STATION					
PIPELINE LOCATOR TRANSMITTER					
PIPELINE LOCATOR RECIEVER					
PIN LOCATOR					
TRIBRACHS	NOT APPLICABLE				

PERCHERON, LLC

Vehicle Use Agreement

I, the undersigned, hereby acknowledge assignment of a company owned or leased vehicle to be used while performing my duties for the Company. As part of that assignment, I agree to the following:

- a) The vehicle will be operated in a safe, courteous manner at all times.
- b) I will wear my seat belt while operating the vehicle and will require all occupants to do so.
- c) I will be responsible for all traffic violations and/or parking violations while I am operating vehicle.
- d) I will not let family members or other un-authorized drivers operate the vehicle while in my possession.
- e) I realize all articles of the agreement apply regardless of who is operating the vehicle. If an assignee needs to authorize another company employee to drive the assigned vehicle, he must check with his supervisor to make sure the other employee is authorized to drive company vehicles.
- f) I understand that assignment of this vehicle to the assignee can be terminated at any time by the company and the vehicle must be delivered to the company office upon request. In the event of termination of employment, the assignee must return the vehicle to the company office at the end of the last day of employment. If the assigned vehicle is not returned within 24 hours of termination of employment and/or termination of this agreement, the vehicle will be reported to authorities as stolen.
- g) I will report all accidents or incidents promptly that result in injury and/or damage to the vehicle or other property, no matter how slight.

I understand I am required to maintain a valid driver's license and that any change in status will be reported immediately.

I understand that operating the vehicle in an impaired state or while severely fatigued may be grounds for disciplinary action including, but not limited to, suspension of company driving privileges and/or immediate termination of employment.

I understand I am not to modify the vehicle in any way without written permission from the Company President. (This specifically applies to installation of CB radios, cellular phones, speakers, radios, etc.) Stickers of any kind are prohibited on tailgate and/or doors, unless Company required.

I will not take the vehicle out of the State of Texas without written permission from the Company President.

I understand the operation of the vehicle in a safe manner is my responsibility. If, at any time, there is a safety issue with the vehicle, I will report it immediately to my immediate supervisor.

I have read and agree to the provisions of this Vehicle Usage Agreement. I understand that failure to comply with any provision of this agreement may result in disciplinary action up to, and including suspension of company vehicle driving privileges and/or termination of employment.

ASSIGNEE NAME:	DRIVER"S LICENSE #:
SIGNATURE:	DATE:
VEHICLE VIN#:	LICENSE PLATE #:

PE	RCHERON
	UNIT No:
Date:	LOCATION:
VIN No :	
Odometer Reading:	Year / Make / Model
License Plate No:	State:
Date Registration Expires (Sticker on window or plate):	
Date inemestion dues	State increated in
Vehicle Condition (Circle one: Good Fair Poor)	Oil Change Due Date:
Venicle Condition (Chicle One: Cood, 1 ali, 1 cor)	
Body: GFP	Date:
Windshield: G F P	Mileage:
Tires: G F P	
Alignment: G F P	
Shocks: G F P	Any Leaks? Y / N
Transmission: G F P	
Please ma	irk any damage to vehicle below
•••••	
(89)	
EMPLOYEE SIGNATUR	E DATE:



UTV	Make	and	Model:
-----	------	-----	--------

VIN #:_____

Date:_____

Location:_____

Inspection completed by:_____

Fill out each section to indicate that the equipment was in good condition. Record any issues (e.g. damage, excessive wear, debris, etc.) in the

"Comments" section below. Take a minimum of six pictures showing drivers side, passenger side, front, rear, under carriage and interior of UTV.

	GOOD	FAIR	POOR	COMMENTS:
Tire condition				
Throttle and Brake pedal operation				
Emergency Brake				
Check all Lights front and back & Caution light				
Back Up alarm				
Oil level and Condition				
Fuel level				
Fluid leaks				
Front and Rear CV Boots				
Exhaust pipe and sound				
Seats and Seatbelts				
Wheel wells				
Fire extinguisher				
Windshield and Vents				
Overall condition: (clean or dirty)				
Check gauges, indicators and meter				
				COMMENTS:
Walk around inspection: Note damage to body panels. Look under vehicle for such items as debris build up, fluid leaks, and damage to undercarriage components				
UTV PICK UP/DROP OFF Inspection Checklist		1	V.1.1	Page 1 of 1

VEHICLE ACCIDENT REPORT

Page 1 Percheron Vehicle Only

Accident Essentials			Office Use Only	Insurance Information
	Accident Date		Claim Number	
	Accident Time of Day		Insurance Company	
	Office		Insurance Case Manager	
			-	
	Driver of Percheron Vehicle			
	Drivers' License Number		Case Manager's Phone	
	Percheron Vehicl	le I	nformation	
Year, Make & Model of Vehi	cle:			
Names of Occupants of Perc	heron Vehicle:			
List Persons Injured and Type	e of Injury if Known:			
Police Report #:	Police Div	isio	on :	
Describe Any Violations/Cita	tions As Result of Accident:			
	Accident	De	tails	
Location of Accident:				
County:	City:			
Street or Highway Name:				
Closest Intersecting Highway	/Approximate Distance:			
Weather and Road Condition	ns (check all that apply)			
Sunny/Clear	Concrete			
Partly Cloudy	Asphalt			
□ Cloudy	□ Gravel			
🗆 Rain	□ Dirt			
Snow/Sleet/Ice				



This is a two-sided form.

VEHICLE ACCIDENT REPORT

Page 2 for Other Vehicles Involved

Other Vehicle Information
Year, Make & Model of Vehicle & License Plate #:
List Injured Persons and Injury if known:
Damage to the Other Driver's Vehicle:
Other Driver's Name, Address, Phone Number & Driver's License #:
Vehicle Owner's Name, Address, Phone Number (if different than Driver):
Owner's Insurance Company & Policy #:

Send the specified copies to your Workers' Compensation Insurance Carrier and the injured employee.

*Employers - Do not send this form to the Texas Department of Insurance, Division of Workers' Compensation, Unless the Division specifically requests a direct filling.

CLAIM #	

CARRIER'S CLAIM #

EMPLOYERS FIRST REPORT OF INJURY OR ILLNESS

1. Name (Last, First, M.L)		^{2. Sex} F M M	15. Date	of injury (m-	d-y) 16. Time :	finjury m 🔲 pm 🗖	17. Date Lost Time Bega (m-d-y)	an
3. Social Security Number	4. Home Phone	5: Date of Birth (m-d-y)	18. Natu	re of Injury*	19. Part o	Body injured or	Exposed*	
	$\langle \rangle$							
6. Does the Employee Speak	English? If No, Spec	fy Language	20. How	and Why Inju	ry/liness Occurred	•		
YES NO								
7. Race White 🗖	8. Ethnici	^{1y} Hispanic 🗖	21. Was doin	employee a his VES	s 🗖 22. Works	te Location of In	jury (stairs, dock, etc.)*	
Black 🗖 Asian 🛙	I Natiw	American 🔲 Other 🗖	regu	larjob? NO	50			
9. Mailing Address Street o	9. Mailing Address Street or P.O. Box			 Address Where Injury or Exposure Occurred Name of business if incident occurred on a business site 				
City	State	Zip Code County	Stree	t or P.O. Bax	ſ	Coun	ty	
10. Marital Status Married Widowed	Separated	Single D Divorced D	City		Sta	e Zip	Code	
11. Number of Dependent C	11. Number of Dependent Children 12. Spouse's Name					2.)*		
13. Doctor's Name			25. List	Vitnesses				
14. Doctor's Mailing Address	(Street or P.O.Box)		26. Retu date/o (m-d-y	rn to work r expected)	27. Did employee dia?	28. Supervi Name	sor's 29. Date Reporte (m-d-y)	be
City	State	Zip Code		-	YES□ NO I			

30, Date of Hire (m-d-y)	31. Was employee hired or recruited in Texas?	32, Length of Service in Current Position		33. Length of Service in Occupation		
	YES NO NO	Months	Years	Months Years		
34. Employee Payroll Classification	n Code 35. Occupation of Injured W	orker				
36. Rate of Pay at this Job	37. Full Work Week is:	38. Last Paycheck was: 39. Is employee an Owner, Pa or Corporate Officer?				
SHourly SWeekly	HoursDays	\$ fo	r Hours or Days	YES NO		
40. Name and Title of Person Com	pleting Form	41. Name of Bu	Jsiness			
42. Business Mailing Address and	Telephone Number	43. Business L	ocation (If different from mailing	g address)		
Street or P.O. Box	Leiephone	Numper an	d Street			
		07	01-11	7-0-1-		
City	State Zip Code	City	State	Zip Code		
44. Federal Tax Identification Num	ber 45. Primary North American Industry Classific	ation System	45. Specific NAICS Code (8 diat)	 Texas Comptroller Taxpayer No. 		
	Code:(C clight)		(o'aigit)			
48. Workers' Compensation Insura	ance Company	49. Policy Num	ber			
50. Did you request accident prevention services in past 12 months?						
YES NO 16 If yes, did you receive them? YES NO						
51. Signature and Title (READ INS	STRUCTIONS ON INSTRUCTION SHEET BEFORE SIG	NING)				
X		Date				

DWC FORM-1 (Rev. 10/05) Page 3



DIVISION OF WORKERS' COMPENSATION



Project:	Meeting Date:
Presenter:	Topic:
Location:	

Name	Signature	Title	Company



Percheron Safety Manual – APPENDIX II

	Travel Safety Management Plan	Document No.: 100-Travel-Form		
PERCHERON	naver ourcey management i an	Rev 0		
1. General Information	1			
Purpose of Travel:	Destination:			
Is this trip necessary?	Yes No Will you be towin	ng ?: 🗌 Yes 🗌 No		
Driver's Name:	Phone No.:			
Alternate Driver's Name	Alt. Driver's Phone	No.:		
Additional Passenger's I	Name(s):			
Vehicle: 🗌 Rental 🗌 🤅	Company Personal Make Model	Color		
2. Trips / Routes and I	Hazards			
List hazards likely to be en being transported. For eac	countered during the journey that can pose significant threat to ch hazard, identify precautionary measures to prevent injury or lazard P	o vehicle occupants and/or materia r damage during the journey. recaution		
1.	·			
2.	·			
3.	·			
4.	·			
5	·			
5 3. Driving / Road Cond	ditions			
5 3. Driving / Road Cond Interstate Paved	ditions I Road Dirt Road Hills Other:			
5. 3. Driving / Road Cond Interstate Paved Projected Weather Cond	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow \\	Wind 🗌 Fog		
5	ditions Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N buld be taken / followed by the driver(s) due to the route,	Wind 🔲 Fog , weather and road conditions:		
5 3. Driving / Road Cond Interstate Paved Projected Weather Cond List precautions that sho	ditions Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow \ ould be taken / followed by the driver(s) due to the route,	Wind		
5 3. Driving / Road Cond Interstate Paved Projected Weather Cond List precautions that sho	ditions Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow \ ould be taken / followed by the driver(s) due to the route,	Wind 🔲 Fog , weather and road conditions:		
5 3. Driving / Road Cond Interstate Paved Projected Weather Cond List precautions that sho Night Driving Authorized	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N ould be taken / followed by the driver(s) due to the route, E. Yes No If night driving, how are you mitigation	Wind		
5 3. Driving / Road Cond Interstate Paved Projected Weather Cond List precautions that sho Night Driving Authorized	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow \ ould be taken / followed by the driver(s) due to the route, build be taken / followed by the driving, how are you mitigating	Wind		
 Driving / Road Cond Interstate Paved Projected Weather Cond List precautions that sho Night Driving Authorized Areas or Routes to 	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N build be taken / followed by the driver(s) due to the route,	Wind		
 5	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow \ ould be taken / followed by the driver(s) due to the route, build be taken / followed by the driving, how are you mitigation I: Yes No If night driving, how are you mitigation be Avoided	Wind		
 <u>Driving / Road Cond</u> Interstate Paved Projected Weather Cond List precautions that sho Night Driving Authorized Areas or Routes to 	ditions Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N ould be taken / followed by the driver(s) due to the route, build be taken / followed by the driving, how are you mitigating t: Yes No If night driving, how are you mitigating be Avoided	Wind		
 Driving / Road Cond Driving / Road Cond Interstate Paved Projected Weather Cond List precautions that sho Night Driving Authorized Areas or Routes to Duration / Distance 	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N build be taken / followed by the driver(s) due to the route, I: Yes No If night driving, how are you mitigation be Avoided of Travel	Wind		
 <u>Driving / Road Cond</u> Interstate Paved Projected Weather Cond List precautions that sho Night Driving Authorized Areas or Routes to Duration / Distance Date / Time of Departure 	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N build be taken / followed by the driver(s) due to the route, I: Yes No If night driving, how are you mitigative be Avoided of Travel e: / Planned Time or	Wind weather and road conditions: <i>ing additional hazards:</i>		
 5	ditions Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N build be taken / followed by the driver(s) due to the route, t: Yes No If night driving, how are you mitigating be Avoided of Travel e: / Planned Time or Rest Period Every	Wind weather and road conditions: <i>ing additional hazards:</i> of Arrival: Miles Hours		
 5	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow V build be taken / followed by the driver(s) due to the route, U build be taken / followed by the driving, how are you mitigative be Avoided of Travel e: / Planned Time o Rest Period Every se / Communication	Wind Fog , weather and road conditions: ing additional hazards: of Arrival: Miles Hours		
 Driving / Road Cond Interstate Paved Projected Weather Cond List precautions that sho Night Driving Authorized Areas or Routes to Duration / Distance Date / Time of Departure Travel Distance: Emergency Respon Contact Designated M 	ditions Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N build be taken / followed by the driver(s) due to the route, build be taken / followed by the driving, how are you mitigating be Avoided of Travel e: / Planned Time of Rest Period Every ese / Communication anager upon reaching final location or deviation from	Wind Fog , weather and road conditions: ing additional hazards: of Arrival: Miles Hours m planned route /schedule.		
 5	ditions Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N build be taken / followed by the driver(s) due to the route, build be taken / followed by the driving, how are you mitigating be Avoided of Travel e: / Planned Time of Rest Period Every ise / Communication anager upon reaching final location or deviation from Phone No	Wind Wind Fog weather and road conditions: ing additional hazards: of Arrival: Miles Hours m planned route /schedule.		
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 5	ditions Road Dirt Road Hills Other:	Wind Fog weather and road conditions: additional hazards: of Arrival: Miles Hours m planned route /schedule. o.: ne No.		
 Driving / Road Cond Interstate Paved Projected Weather Cond List precautions that sho Night Driving Authorized Areas or Routes to Areas or Routes to Duration / Distance Date / Time of Departure Travel Distance: Emergency Respon Contact Designated Manager's Name: Manager's email: Hotel Information (if app AUTHORIZATION AND We agree to follow of Pave 	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow V build be taken / followed by the driver(s) due to the route, build be taken / followed by the driving, how are you mitigatil be Avoided of Travel e: / Planned Time o Rest Period Every se / Communication anager upon reaching final location or deviation fromPhone No licable):Hotel Phore ACKNOWLEDGMENT ercheron Survey, LLC Travel and Driving Policies and Pices	Wind Fog weather and road conditions: ing additional hazards: of Arrival: Miles Hours m planned route /schedule. b.: ne No.		
 5	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow N build be taken / followed by the driver(s) due to the route, build be taken / followed by the driving, how are you mitigative be Avoided of Travel e: / Planned Time o Rest Period Every Planned Time o Rest Period Every Phone No licable): Hotel Phore ACKNOWLEDGMENT ercheron Survey, LLC Travel and Driving Policies and Pi Signature:	Wind Fog weather and road conditions: additional hazards: additional hazards: additiona		
 5	ditions Road Dirt Road Hills Other:	Wind Fog weather and road conditions: additional hazards: additional hazards: additional hazards: bf Arrival: Miles Hours m planned route /schedule. b.: ne No. rocedures. Date:		
 5	ditions I Road Dirt Road Hills Other: ditions: Sun Rain Overcast Snow V build be taken / followed by the driver(s) due to the route, build be taken / followed by the driving, how are you mitigatin be Avoided of Travel e: / Planned Time o Planned Time o Rest Period Every see / Communication anager upon reaching final location or deviation from Phone No licable) : Hotel Phore ACKNOWLEDGMENT ercheron Survey, LLC Travel and Driving Policies and Pi Signature:	Wind Fog , weather and road conditions: ing additional hazards: of Arrival: Miles Hours m planned route /schedule. D.: rocedures. Date: D		

Travel_Safety_Management_Form.doc

REQUEST FOR MEDICAL AND EXPOSURE RECORDS ACCESS

erby request access to (my) ()'s
ull Name of Employee - Please Print)		
Medical Records		Exposure Records	
s it/they relate(s) to the following co	onditions of (my) (his/l	ner) employment or place of	employ

I understand I will be provided access to the requested record(s) within a reasonable time, place, and manner, but in no event later than fifteen (15) days after the date of this request. I further understand that whenever a record has been provided previously without cost, I may be charged reasonable, non-discriminatory administrative costs for additional copies.

(Signature of Employee or Designative Representative)

(Date)

If you have questions, please call Human Resources at 832-300-6400.

Percheron Safety Manual – APPENDIX II

Short Service Employee (SSE) Release Document

Department or Business Unit:	Date:			
Working as a sub-contractor: () Yes () No	Current Position:			
SSE Name:	Years of Relevant Experience:			
Date of Employment:	Experience in Present Position:	Year Mon	rs: iths:	
Who has been assigned as the SSE mentor (if applica	ible)?			
Employment Record: (Last 3 years, if available)				
Previous Employer(s)	Start Date	Dep	oarture D	ate
List all completed mandated training for role(s):				
*Training certificates shall be readily available upon r	equest			
	cquest			
List all current training gaps required for the role(s):				
TIN IN I I I I I I I I I I I I I I I I I				
Inis portion to be completed by worker during conve	ersotion with Percheron represented	ative		
1. I have been trained, skilled, and knowledgeable	to salely perform my task(s).			
 I understand and have been given an orientation and understood expectations. 	to the postion I have been hire to	D	⊔Yes	
3. I understand the Percheron Rules to Live By and e	expectations of Stop Work Authori	ły.	□Yes	No 🗆
I understand expectations around fatigue and fit	ness to work.		□Yes	No 🗆
I have received and understand the contents of t	he Percheron Safety Manual		□Yes	No 🗆
Review and Approval				
Worker:	Sign Here	Date	2	
Supervisor/Mentor:	Sign Here	Date	•	
Manager/HSE Representative:	rte			
It restrictions are identified, list here:				
Supervisor/Mentor approval to remove SSE from	Sign Here	Date	2	
Program after 3 months				

Manager/HSE Representative Signature:	Date:
Additional Comments on the SSE Performance and Knowledge:



"Safety Brings US Home"

APPX II-19



Accidental Discharge or Spill Summary Form

General Information:

Client Name:	County:
Project Name:	Location (GPS Coordinates):

Start Date Start Time	End Date End Time	Volume (gallons)	Location	Cause	Steps Taken to reduce, eliminate, and prevent recurrence	Description/Content
Information Reported By (Name/Title): Signature:						
Date Report	ed:					

ASSURED GROUNDING EQUIPMENT INSPECTION FORM Quarterly Record of Inspection

Inspector: _____ Company: _____

January through March: White April through June: Green July through September: Red October through December: Orange

Date	Type of Equipment	Manufacturer Name	Visual Inspection	Continuity Test	Ground Conductor Test

APPX II-21

LOTO PERMIT

Directions: This permit must be filled out each time any equipment needs to locked out. An authorized employee trained on this LOTO procedure must complete sections 1-2 of this permit prior to authorizing any employees to conduct servicing and or repairs. Section 3 must be completed before permit is canceled. Keep the permit located near the activity of work. New and completed forms will be scanned daily and submitted to the FTP Site of Percheron.

	Section #1: Lock Ou	t Tag Out Permit
Permit Date:		
Equipment:		
Reason (Circle):	Cleaning & Inspection /	PM / Planned Repair (Work Order) / Unplanned Repair
Duration of Work	Start Time	Finish Tim <u>e</u>
Employee(s):	A	uthorize Yes or No
Employee(s):	A	uthorize Yes or No
Contractor:	A	pproved Yes or No
	Section #2: V	erification
Initi	Total energy After zero er points have b	<i>i</i> isolation lergy has been established, confirm that all lock out been isolated. And that the key is in your possesion
Approved By: Signa	ture	Print Name
	Section #3: Sta	rt-Up Review
Initi Initi Initi	al Equipment al Confirm that al Equipment al ensure mac al ensure mac al over again and corrective actions:	Start-Up all procedures have been followed prior to start-up. or system performs properly hine is operating properly. If not, start the process n.
Approved By:		
	Signature	Date
	Drint Namo	

Percheron- Noise Exposure Monitoring

Company Name:							
Tester Name:							
Testing Date:							
Date	Building	Area/Room	Location	Reading (dBA)	Hearing Protection Required? (Yes/No)		
Noise	Dosimeter	Sound Level Calibrat	tor				
Manufacturer							
Model -							
Signature							
Additional Comments:							

Percheron Monthly Fire Extinguisher Inspection

Date

Inspector



Office Location

This inspection is to ensure the following: The pin is intact, it has an updated tag, the seal is intact, the extinguisher itself is pressurized verified by the needle is pointed in the green area on the gauge and that it is not blocked and easily accessible

Extinguisher		
Location	Type & Size	Defects

Percheron Monthly Fire Extinguisher Maintenance & Inspection



This inspection is to ensure the following: The pin is intact, it has an updated tag, the seal is intact, the extinguisher itself is pressurized verified by the needle is pointed in the green area on the gauge and that it is not blocked and easily accessible

Ext. Name	Extinguisher Location	Type & Size	Purchase Date	Annual Inspection	6 yr Service	Hydrostatic Service	OOS Date



H2S Monitor Bump Test Log

Client/Project Name:_____

Location:_____ Date:_____ Date:_____

H2S Monitor Brand Name	Model Number	Serial Number	Name of Employee H2S Monitor is Assigned to	Months Remaining (Lifespan of two Years)	O2 Read	LEL Value	LEL Read	H2S Value	H2S Read	CO Value	CO Read	Test Conducted By

Annual Policy Review form

Date

Reviewer



Policy

This review is to ensure the application, effectiveness, and adequacy of all policies.

YES or NO	Question
	Has there been any changes to OSHA or related oversight Regulations?
	Is the policy implemented If not what can be done to improve usage and implementation?
	Are there any improvement opportunities?

GFCI Location Specific Master Inventory List

Date

Inspector



Location/ Office

GFCI Outlet Number	Location

Percheron Truck Required Inventory List



At a minimu all field trucks shall have the following safety equipment and information at all times:

- 5 Person First aid kit and instructions
- 5 lbs ABC Fire extinguisher
- Hi-Visibility safety vests for all crew members
- Hard hats for all crew members
- Anzi Z87 compliant Safety Glasses
- A installed bluetooth or similar device to allow for hands free communication
- Reflective triangles or cones
- Flashlight
- N95 disposable masks for all crew members
- Portable, flashing safety light

Trucks Assigned to work on Active Roadways will additionally have:

- Traffic control signs and holders
- Orange traffic safety cones
- Other state and local approvals/permits as required



percheronllc.com

Onsite New Hire Orientation Review						
Date:						
Supervisor / Current Employee:						
Location/Office/Project:			Ρ	ERCH	IERON	
New Hire or Transferred Employee:						
Please indicate in the corresponding column that the employee has been informed of the following			<u>No</u>	<u>Reason if No</u>	is selected	
Location of the Employee informatio	on board					
Location of all fire extinguishers						
Review & Location of evacuation ma	aps					
Employee Break Room and appropri	ate use					
Bathrooms (water closets and hygiene supplies)						
Location and Emergency Contact List	:					
Location of the First Aid Kit						

	SAMPLE LABE	Ľ	
CODE Product Product Name Identified	t ier	Hazard Picto	ograms
Company Name	er ication		
Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling	Hig Ma Precautionary Statements	Signal W Dange ghly flammable liquid and vap ay cause liver and kidney dam	vor. age. Hazard Statements
Dispose of in accordance with local, regional, national, international regulations as specified. In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO ₂) fire extinguisher to extinguish.		Supplemental Directions for Use	Information
First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.		Fill weight: Gross weight: Expiration Date:	Lot Number: Fill Date:

APPENDIX III – SITE SPECIFIC FIRST AID KIT LISTING

A site-specific listing of the contents of the on-site first aid kit which shall be developed, implemented, and maintained, by the appropriate level of local management who has full authority for its execution.

APPENDIX IV - SITE-SPECIFIC HAZARDOUS COMMUNICATION (w/SDS)

A site-specific listing of hazardous chemicals (with their SDS) which shall be developed, implemented, and maintained, by the appropriate level of local management who has full authority for its execution.

APPENDIX V - SITE-SPECIFIC ASBESTOS LISTING

A site-specific listing of asbestos awareness training, possible locations, health effects, what to do with asbestos, and what to do when working on multi-contractor worksites that may have asbestos.

APPENDIX VI – SAFETY MANUAL REVISION HISTORY

Version	Date	Author	Change Description
0	2/4/2013	Kenneth Watts	First Version
1	1/23/2014	Kenneth Watts	Reformat to Prior Documents
2	2/12/2014	Kenneth Watts	Incorporated the Drug & Alcohol Policy and Updated Lighting Safety.
3	3/18/2014	Kenneth Watts	Update to PPE, HazCom, First Aid, Blood-Borne Pathogens, and Violations/Discipline to meet client standards.
4	8/27/2015	Justin Lyon	Customer Required Updated
5	10/1/2016	Kyle Parko	Formatting changes and content updated
6	12/29/2016	Kyle Parko	HSE Policy Better outlined, Additions to Drug and Alcohol Policy
7	04/04/2018	Justin Lyon	Update contact information for key contacts
8	6/19/2018	Justin Lyon	Update to the following programs: Heat Related Illness, Cold Related Illness, Asbestos Awareness, and Site-Specific Hazard Communication. Formatted all sections.
9	7/9/2018	Justin Lyon	Update to the following programs: Communication, Schedule of Training and Safety Inspections, Incident, Near Miss, & Observation Reporting & Investigation, Job Competency, Fit for Duty – Field / Office Personnel, Long Distance Travel & Time Management, Vehicle Policies / Procedures, Vehicle Accident Report, & Record Keeping, Vehicle Selection, Inspection, and Maintenance, and Driver Safety. Formatted all sections.
10	11/30/2018	Justin Lyon	Update to Office Safety program to include working with Hand & Power Tools. Added written programs: Noise Exposure/Hearing Conservation and Hazardous Waste Operations /RCRA.
11	12/11/2018	Justin Lyon	Added written programs: Spill Prevention, Lock Out/Tag Out, and Access to Employee Medical and Exposure Records. Update to Blood Borne Pathogens, Ladder Safety, Fire Protection.
12	12/26/2018	Justin Lyon	Added written program, Working Near Water. Year changed to 2019 where applicable.
13	3/15/2019	Justin Lyon	Revised Safety Hotline Contact Number.
14	4/12/2019	Justin Lyon	Update to Ladder Safety and Site-Specific Hazard Communication written programs.
15	7/1/2019	Justin Lyon	Update to SSE written program. Added SSE Release Form to Appendix A.
16	7/31/2019	Justin Lyon	Added Jobsite Security and H2S written programs. Added Medical Case Management Contact Information. Added Nick Holub, HSE Manager Contact Information.
17	11/18/2019	Nicholas Holub	Revised Environmental and Vehicle Policies and written programs.

18	01/27/2020	Nicholas Holub	Changed the cover page date to reflect 2020. Reviewed/Revised the following written programs: Stop Work Authority, Incident Accident Near Miss Investigation, Hearing Conservation, and Lock Out/Tag Out.
19	1/29/2020	Nicholas Holub	Added Naturally Occurring Radioactive Material NORM policy.
20	2/13/2020	Nicholas Holub	Revised Blood Borne Pathogens Written Program. Added Electrical Safety Awareness Written Program.
21	2/20/2020	Nicholas Holub	Added Ground Fault Protection/GFCI Written Program and Form
22	3/25/2020	Nicholas Holub	Added Pandemic Preparedness Policy Written Program.
23	04/12/2020	Nicholas Holub	Slips, Trips and Falls and Hand and Power Tools Program Update
24	05/01/2020	Nicholas Holub	Added PSM, Lead, Benzene Awareness Programs
25	2/17/2021	Nicholas Holub	Hurricane Policy and Hotline Poster Updates
26	3/9/2021	Nicholas Holub	Short Service Employee Policy Update
27	3/23/2021	Nicholas Holub	Added Stairway and Infection Control Policies
28	04/20/2021	Nicholas Holub	Administrative Updates/changes to Subparts A, B, D, G, H and K.
29	04/21/2021	Nicholas Holub	Added Forms: Fire Extinguisher Inspection, Fire Extinguisher Inventory and Maintenance, Truck Inspection, UTV Inspection, H2S Bump Log, Annual Policy & Program Review, Noise Monitoring, and LOTO Permit.
30	05/07/2021	Justin Lyon	Changed Primary HSE POC from Nick Holub to Justin Lyon
31	07/08/2022	Justin Lyon	Revised Lifting and Risk Management policies
32	07/18/2022	Justin Lyon	Revised Subpart D -D&A Policy clents
33	08/30/2022	Justin Lyon	Added new written program "Project Violence Response Plan" to subpart Q
34	02/17/2023	Justin Lyon	Revised Subpart E – Vehicles – Rental Vehicles
35	02/17/2023	Justin Lyon	Revised Subpart E – Vehicles Policy – Rental Vehicle inspections/document retention
36	03/20/2023	Justin Lyon	Revised Subpart – Subcontractor Management –Add Reporting to ISNetworld & Low Risk Subcontractor Management Questionnaire, Revised Subpart J – Hand and Power Tool Safety – Add hazard assessment when selecting using tools
37	05/11/2023	Justin Lyon	Revised Subpart E – Vehicles to include additional requirements while operating a UTV. Revised Subpart F –Driving to address GPS use when driving, Revised Subpart M – First Aid to include the use of an AED.
38	09/05/2023	Justin Lyon	Added Respiratory Protection Program to Subpart O.