

Integrity Environmental Services, Inc.

Policies and Procedures

2018

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INTEGRITY ENVIRONMENTAL SERVICES, INC

ACCIDENT REPORTING PROCEDURES

Accident Reporting

All accidents, potential accidents and near misses, as well as infection control exposures shall be immediately reported to the Health and Safety department/ Project Manager. This must be done no later than 12 hours following the event. All accidents will be investigated. Accidents involving serious injury, severe equipment damage, and those regulated by various DOT regulations will be handled as such within the regulatory framework of the regulations. There are specific reporting and situational requirements elsewhere in the procedures manual that detail reporting requirements in greater detail.

INTEGRITY ENVIRONMENTAL SERVICES, INC

ACCIDENT INVESTIGATION PROGRAM

Accident Investigations

Accidents are a very costly, yet potentially controllable expense. In order to better manage this expense, the following accidents will be investigated:

- * OSHA recordable incidents,
- * property damage over \$250, or
- * accidents that involve another vehicle, other than a Integrity vehicle.

It is a fact that accidents occur, however, given a little forethought, most accidents could have been prevented. A preventable accident is one in which the employee failed to do everything possible to avoid the incident. Preventability is not based on whether a claim is paid, whether the employee was reimbursed for losses, or whether he/she was legally in the right; but rather on whether the employee did everything possible to avoid the accident. If not, that employee must be held responsible and charged accordingly.

Integrity Accident Review Procedure

1. All accidents shall be reported immediately to the employee's supervisor and the Project Manager. Reporting an accident immediately will often require a phone call from the scene to the home office.

Safety sensitive employees may be required to submit to post accident alcohol and controlled substances testing. All employees involved in an accident shall refrain from using alcohol for eight hours following the accident.

The employee may be required to complete an accident form, a property damage form, a spill form, and/or a DOT Form F 5800.1 depending upon the type and severity of the accident. Under ideal circumstances, these forms will be faxed to the scene for completion and faxed back to the office. Each driver should carry copies of these forms with him for those times when a fax is not readily available. These forms need to be completed and returned to the Project Manager as soon as reasonably possible. (Some accidents require immediate reporting, others need to be reported within 8 hours, and others within 24 hours.)

2. Applicable accidents will be reviewed by an Accident Review Board who will make the final recommendation on preventability/chargeability to the President.

- Purpose:
- a. To decide the degree of preventability.
 - b. To establish and maintain individual driving records.
 - c. To investigate accident circumstances and to affix responsibility.
 - d. To make the final recommendation of chargeability to the President.

Organization: The Accident Review Board Members:

- a. One member of management.
- b. The supervisor of the employee being reviewed.
- c. One fellow employee (to be picked at random).

The Review Board will meet on that day closest to the date of the accident, when all members and the employee in question can conveniently attend. The meeting will be chaired by the management representative.

The majority of the meeting will be devoted to discussion of the accident: the circumstances, the details, the "whys?" and how it could have been avoided. After the employee has explained the accident verbally and in effect, stated his/her case, each member of the board will have the opportunity to question the employee. Open, informal discussion by all parties is encouraged.

After a thorough discussion, the employee will be dismissed from the proceedings with the understanding the degree of preventability and employee responsibility is to be decided by a majority vote by the Accident Review Board. The Accident Review Board will make its recommendation to the President.

3. Determining Preventability and Employee Responsibility.

Preventability will be determined on the following basis:

- A. Some accidents are not preventable. Some are purely acts of God or random chance. Others are simply out of the employee's control.

Example: An Integrity truck stopped for a red light and is struck in the rear by a motorist whose brakes failed.

- B. The all-important question to be answered when reviewing an accident for preventability is: Was there anything the employee could have done which would have prevented the accident? If the answer is yes, the employee is responsible, at least, to some degree.

- C. When it has been determined that the employee was involved in a preventable accident, it will be the responsibility of the employee's supervisor to personally inform the employee of his/her charge and to discuss with him, preventive measures recommended by the board.
- D. Classification of accidents and corresponding disciplinary actions.

Class "A" Accidents – An accident in this category is one in which there was no negligence by our employee. The employee's involvement in an accident of this nature will merely be a matter of record and no disciplinary action will be considered.

Class "B" Accidents – An accident falls into this category when our employee cannot prove "beyond a reasonable doubt," that he/she did everything possible to prevent being involved in a situation that resulted in an accident.

Example: Our vehicle strikes an illegally parked vehicle on the side of the road.

4. Minimum Consequences/Disciplinary Actions

A. "A" Accidents

- 1. There will be no disciplinary action taken in case of a "A" accident.

B. "B" Accidents

1. The first "B" accident will result in a written letter, detailing the circumstances of the accident, being placed in the employee's permanent file.

2. The second "B" accident, if it occurs within 12 months of the first "B" accident, will result in 10 days time off without pay.

3. The third "B" accident to occur within a 12 month period, will result in immediate discharge.

NOTE: These are minimum disciplinary guidelines. Management always retains the right for additional disciplinary action based upon the type and severity of the incident

A written record of all accident investigations, as herein outlined, will be made part of the involved employee's personal record and file.

INTEGRITY ENVIRONMENTAL SERVICES, INC

CONFINED SPACE PROCEDURE

Overview

This Standard Operating Guideline (SOG) describes the correct procedures and equipment needed for conducting confined space entry. In general all permit entry confined spaces will follow this guideline, or a similar guideline.

Responsibilities

The Project Manager is responsible for the oversight of the entire project including the administrating the operational plan.

- The project manager will determine with the health and safety dept. the appropriate PPE to be utilized
- Individuals who will be required to work on projects involving confined spaces require certification and completion of a confined space entry training program.
- All personnel who will act in the role of a rescuer on a job site will require confined space rescue training with appropriate refreshers.

Procedures

The project manager is responsible to complete the equipment load out and ensure such equipment arrives on the job site. All personnel on the job site should have training in the use of the equipment to be used in the confined space entry, as well as the other equipment to be used on the project site.

A tailgate safety meeting will be held to review the entry, chemicals, complexity and configuration of the space to be entered. Personnel shall don the appropriate safety equipment and PPE, including the full body harness and Level B respiratory equipment. A means of mechanical advantage retrieval system will be required for all vertical confined spaces. An example of this is a rope / pulley system with at least a 2:1 mechanical advantage, or a winch and tripod designed and certified for personnel.

Equipment to be used for confined space entry and personnel positioning will not be used to hoist equipment, supplies etc. When using a rope entry system, the rope shall be ½ inch static kernmantle rescue line.

When entering a horizontal space, entrants will utilize a full body harness, and will employ tag lines / retrieval lines.

All other confined space operations will follow Integrity's confined space training and guidelines, as well as our written procedure.

Anytime it is determined that a PPE downgrade is available, including down grading to from level b to level c; it will be verified by contacting the health and safety department before it is initiated.

INTEGRITY ENVIRONMENTAL SERVICES, INC

EMPLOYEE TRAINING/ NEW HIRE POLICY

New Hire Orientation/Training

Prior to being hired **all employee applicants** will be required to undergo a complete medical evaluation, including pulmonary test and drug testing. This is to determine if the applicant is physically capable of performing tasks and physically able to wear a negative pressure respirator. The applicant will be scheduled for the medical evaluation and pulmonary test at Concentra Medical Center or US Healthworks. Any applicant not passing both the physical and pulmonary test will not be eligible for hire.

Once the office **receives written documentation** that the applicant has successfully passed both the physical and pulmonary test and is able to work without restrictions they will be scheduled for a respirator fit test. The fit test will be conducted at Integrity Environmental Services, Inc.'s offices of business. The applicant must pass the fit test to be eligible for employment.

If the applicant is applying for asbestos or lead work the applicant will be required to attend an asbestos or lead worker/supervisor course. When written documentation is received in the office that the employee has successfully completed the course, then the employee is eligible for work. If applicant does not successfully pass the respective test they will not be eligible for hire. If the applicant has received prior training and holds a current asbestos or lead worker/supervisor card, then the applicant must provide written documentation of this and may forgo the company paid initial or refresher course.

If certification is required for the initial and refresher courses for employees, then Integrity Environmental Services, Inc. will provide payment. All employees taking initial and refresher courses will be paid at their regular wage for their training.

In the event the employee is terminated before full probationary period is fulfilled, the company reserves the right to hold training pay and other monies due the employee until issued equipment and the costs of training have been reimbursed to the company. Training pay will be released once the employee's obligations have been met.

Parking

Integrity Environmental Services, Inc. provides parking at office location. Designated parking areas will be addressed at the individual job sites. Integrity asks that you abide by the designated parking signs. Please do not park in Visitor designated spaces unless authorized by client. Integrity **will not** pay for any parking tickets or violations incurred by any employee. It is every employee's job to follow parking regulations.

Working Hours

Working hours may differ slightly with position, but are based on a 40-hour workweek (Sun. through Sat.) and 8-hour shifts per day. General office hours are from 7:30 am until 4:00 pm. Specific job sites may have varying starting times but first shift normally begins at 7:00 am and ends at 3:30 pm. Starting time is when we start work, not when we arrive at the job site.

Each employee is required to take lunch. 30 min is allowed for lunchtime. An additional 15 min is allowed for putting on disposable clothing and decontaminating. The 30 min lunchtime is not a paid lunchtime.

The working hours for field workers may vary around the clock based on client availability.

Overtime

All shift start times are generated by the job schedule and may vary due to customer demand. **Overtime hours will not be approved without prior authorization from your supervisor.** Overtime hours are defined as hours accumulated after a 40 hour work week (not hours accumulated after an 8 hour workday.) Salaried personnel may be required to work beyond 40 hours per workweek and will not be reimbursed without prior supervisory approval. Paid time off may be offered in place of overtime reimbursement.

Wages

Part time and temporary asbestos workers will be paid a starting wage of \$17.00 per hour. Full time asbestos workers will be paid a starting wage of \$17.00 per hour.

Full time asbestos supervisors will be paid a starting wage of \$19.00 per hour.

All other starting wages and/or salaries will be determined on a case-by-case basis.

Prevailing wages, white sheet wages, Davis Bacon wages

From time to time prevailing wage (white sheet wages or Davis Bacon wages) are required to be paid. This is based on a per job basis. The hourly basic wage and fringe benefits and rates that are paid are established by the Wisconsin Department of Workforce Development for these projects. We are required to pay these amounts for all hours worked on the jobsite. If the difference between the Wisconsin Department of Workforce Development's hourly basic rate and fringe benefits are greater than Integrity Environmental Services, Inc.'s hourly basic rate and fringe benefits, then the difference will be applied to the workers total compensation package. When calculating overtime only the hourly basic rate established is used for the calculation.

Anyone working on a prevailing wage project may not be entitled to Integrity Environmental Services, Inc.'s travel and per diem pay.

Dress Code

All members of the office staff are expected to dress with good taste and in a manner appropriate to normal business conduct. No tennis shoes allowed.

The company will provide shirts and/or coveralls for certain work in the field.

All employees will have their hair collar length or shorter or employees will have their hair manageable.

All field employees shall wear steel toe and steel shank leather boots when required. Hard hats, safety glasses and high visibility INTEGRITY vests will be worn on ALL projects.

Tools and Equipment

Respirators, hard hats, safety glasses, safety vests, and any other safety equipment are issued at no cost to employees and must either be returned or paid for upon employee's termination or resignation. Employees are responsible for having their own hand tools as required for each job.

Cell Phone Responsibilities

Assigned cell phones

Individuals carrying cell phones are responsible for personal calls and data usage and shall reimburse the company for all costs associated with such.

If a cell phone becomes damaged or lost due to wearer negligence, then the wearer is responsible for costs of repair or replacement. The definition of negligence or normal wear and tear will be made by management on a case-by-case basis.

Report any malfunction or damage immediately to your supervisor.

Cell phones should only be used by supervisors on jobsites for work purposes. All other workers and non-work related phone calls will be made during lunch and non-working hours.

Vacation

Once field employees have become full time employees they are eligible for 2 weeks of paid vacation (10 working days). Hourly employees do not get paid holiday. The employee is only eligible if they accumulated 1664 hours in the previous year from January 1-December 31. All salary employees get paid holidays and vacations up to, but not exceeding, 20 work days. All time off must be requested and submitted in a written format prior to the date of requested vacation time to President Scott A. Erdman or Jacob S. Erdman. Vacation days do not rollover to the following year.

Safety

Specific job site safety information and procedures can be found in the Integrity Environmental Services, Inc. written safety program. All employees are required to take an annual physical at an Integrity Environmental Services, Inc. predetermined clinic. All hourly employees will receive a maximum of two hours of regular pay for the physical. Pre-employment physicals will receive no payment.

Drugs and alcohol are not permitted on the company premises or job site at any time.

It is the responsibility of the employee to report all accidents to your supervisor immediately and the supervisor is to notify the President, Scott A. Erdman immediately.

With all job related accidents, the employees involved will be required to submit to an alcohol and drug screen test as defined in the Integrity Environmental Services, Inc. safety program.

All employees are required to provide Integrity Environmental Services, Inc. with all training records, certifications, licenses that they have obtained.

Accident Reporting

All accidents, potential accidents and near misses, as well as infection control exposures shall be **immediately** reported to the President, Scott A. Erdman. This must be done no later than 12 hours following the event. All accidents will be investigated. Accidents involving serious injury, severe equipment damage, and those regulated by various DOT regulations will be handled as such within the regulatory framework of the regulations. These are specific reporting and situational requirements elsewhere in the procedure manual that detail reporting requirements in greater detail (pg.3).

Close Call Reporting

In our work environment, we may experience close calls – situations in which we realized a potential problem and fixed the problem prior to someone getting hurt. Or perhaps we got lucky and no one was injured.

For example, you may notice someone standing on the top rung of a ladder and you notified them that this was not in compliance with OSHA regulations.

Our goal is to bring these situation to the attention of fellow employees so we can all learn from the close call instead of having an accident. In order to share this information, I ask that you report these close calls to President, Scott A. Erdman or Jacob S. Erdman.

Travel and Per Diem

Definitions:

Travel- actual mileage spent traveling to or from a job site

Per Diem- covers costs associated with lodging, meals, and any other out of town expense incurred

Per Diem and Travel Expense reports will be filled out and submitted for approval. Please allow two weeks for Per Diem to be paid on your expense report.

It is the employee's responsibility to ensure they have enough money to meet their financial obligations.

The company will not pay for personal phone calls, movies, room service or any other non-business related expenses. Employees are required to pay these expenses themselves.

Travel to out of town projects is considered a part of every employee's job description. It should be understood that every individual will eventually be scheduled and expected to report for out of town work. Travel pay and per diem are based on the number of miles traveled outside a radius from the office. It is based on an eight-hour workday minimum. If an employee works less than an eight-hour day for any reason, with the exception of being sick, injured, or completed the job, the per diem and travel will be based on that percentage of hours worked. No additional compensation for per diem or travel will be given for hours worked past an eight-hour day. Any employee being requested to drive their personal auto for a specific company related task will be reimbursed for mileage driven. The Project Manager will perform all administration of per diem. No compensation will be paid for anyone traveling within a 40-mile radius of Integrity Environmental Services, Inc. Fifty cents will be paid for every mile traveled outside of a 40-mile radius, but within a 75-mile radius of Integrity's office. Anyone traveling outside a 75-mile radius of Integrity's office will be paid fifty cents per mile for one trip to the work site and one trip from the work site, starting at the 40-mile radius mark. A minimum of \$35 per day will paid as per diem for every night required to be spent on the job location or the Project Manager may arrange hotel accommodations and pay a \$15 per day meal allowance. Any employee picking up a company owned vehicle to report to the job site will be paid for their drive time from point of pick up to the destination at their normal hourly rate or at a pre-determined travel wage, but will not be paid for mileage. Also, anyone driving a company vehicle with a GVW of over 26,000 lbs. must have a CDL. Travel wages may be instituted on a per project basis. All employees are responsible to arrange their own

transportation to and from the job site. Project Managers may arrange extended trips and travel accommodations. Notice to employees shall be given in these circumstances.

Travel involving flights-

A \$100 flat rate will be paid for days when flying. Mileage compensation will be paid after 40 miles of person's home, for travel to and from an airport. Person driving company vehicle to site, \$100 flat rate plus airfare equivalent will be given. No mileage, per diem, or lodging will be given.

Integrity Environmental Services, Inc. also maintains the following policies and procedures. These policies and procedures are available for review at the Integrity location or online at Integrityenvservices.com

INTEGRITY ENVIRONMENTAL SERVICES, INC

FIRST AID PROCEDURES

REQUIREMENTS

Each work site must have at least one employee trained in First Aid and CPR and be holding current certification.

All confined space entry projects must have at least one person certified in confined space rescue.

Large-scale HAZWOPER sites must have at least one additional member trained to the First Responder level, or EMT Level. These sites will also be equipped with a trauma bag.

Some high hazard sites, which may require antidote kits or advanced medical protocol, may require doctor's orders and/or a paramedic or nurse on site.

Each work site shall have as part of its Contingency or Health and Safety Plan, a procedure to notify local emergency medical care and transportation providers during an emergency.

Personnel should only take actions appropriate to their level of training. Integrity employs personnel with various certifications including:

- First Aid/CPR
- First Responder
- EMT/EMT Paramedic or Nurse

If contact is made with the victim's blood or body fluids, the affected personnel will need to complete a Biohazard Exposure Form and follow the procedures as outlined in Integrity's Bloodborne Pathogen Program.

Not all hospitals, emergency rooms, or trauma centers are equipped or staffed to handle emergency care of victims that are contaminated with hazardous substances. Project managers shall be informed of local facility capabilities and cooperate with the ambulance personnel as to transportation of the victim to the nearest appropriate medical facility.

Under no circumstance will Integrity transport a trauma patient, including patient exposure cases in company or personal automobiles. In rural circumstances, such as off shore diving or remote wilderness sites, transport issues may be modified under direction of Integrity's medical policies.

Also, medical personnel should be provided with copies of material safety data sheets, analytical results, or any other available data to aid in treatment.

Immediate emergency medical care must be provided for the following types of emergencies:

- Airway obstruction;
- Respiratory arrest;
- Cardiac arrest; and
- Stop the bleeding,
- Treat for shock.

PROCEDURES

1. Survey the Scene

Never put yourself or other rescuers at risk. Before rushing, take a general look around to determine the cause of the accident. Things to look for include:

- Electrical hazards – power lines, energized equipment,
- Traffic,
- Fire hazards,
- Confined space hazards,
- Cave-in or collapse hazards,
- Chemical spills.

Continue if no life threatening situations exist.

2. Notify outside/off site EMS

Send another employee whenever possible

3. Perform the primary survey

a. Check for responsiveness

Do not move a victim unless there is an immediate danger.

If blood or body fluids are present, universal precautions shall be employed. This includes the use of latex gloves, safety glasses, and facemasks.

b. Check for breathing

Look, listen and feel for signs of breathing.

c. Check for pulse

d. Check for severe bleeding

Respond as trained to the appropriate situation.

5. Perform a secondary survey

Head to toe examination

6. Determine the appropriate level of decontamination

If injuries are life threatening, a gross decontamination may appropriate. Note: many ambulance companies may require a complete decontamination before they allow the victim into their ambulance.

Medical Protocol

In cases where advanced medical care (EMT level or above) will be required, local medical protocol will be adopted. Typically medical control resides at the nearest trauma center, or at the county medical director, if one exists. All preventative measures, prescribed antidote kits, and hyperbaric treatment protocols, will be approved by the local medical control prior to job site mobilization. Any of these protocols, which may be required to be administered to patients by ambulance or rescue personnel, will be communicated to these personnel prior to project startup.

The Commercial Diving Operations and Safe Practices Manual will dictate medical protocol associated with marine personnel.

INTEGRITY ENVIRONMENTAL SERVICES, INC.

GFCI AND ASSURED GROUNDING PROGRAM

Purpose

To provide employees with protection from workplace electrical hazards.

Scope

All Integrity Environmental Services, Inc. (Integrity) locations.

Guidelines

The procedure is designed to enable employers and employees to recognize the electrical hazards associated with their work and to establish the safety practices that are to be followed in accordance with OSHA 29 CFR 1926.404(b)(1)(ii). The program will cover all cord sets and receptacles, which are not a part of the permanent wiring of the building or structure. This will also include equipment connected by cords and plugs that are used by employees, and applies to all construction sites not equipped with ground-fault circuit interrupters.

Every employee who uses a cord set, attachment cap, plug and receptacle of a cord set, and any equipment connected by a cord and plug shall visually inspect the items for external defects before each day's use. The exception to this is if the cord sets and receptacles are fixed and not exposed to damage. Defects to look for are

deformed or missing pins, insulation damage, and indications of possible internal damage. Equipment found damaged or defective may not be used until repaired.

Tests will be conducted at intervals not to exceed three months on all cord sets and receptacles that are not a part of permanent wiring of the building or structure, as well as company-owned equipment that require grounding.

- Grounding conductors will 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. Above required tests shall be performed before first use, before equipment is returned to service following repairs, and before equipment is used after any incident, which can be reasonably suspected to have caused damage. Cord sets and receptacles that are fixed and not exposed to damage shall be tested at six-month intervals.
- The above requirements set forth shall be adhered to prior to making available or permitting the use of any equipment by employees.
- Tests performed as required in this program shall be recorded. Test records identifying each receptacle, cord set, cord and plug-connected equipment that passed the test shall indicate the last date it was tested or the interval for which it was tested. This record shall be kept by use of logs, color coding, or other effective means, and shall be maintained until replaced by a more current record. The record shall be made available at the job site for inspection by OSHA and any affected employee.

Implementation of Assured Equipment and Grounding Conductor Program

A written description of this program should be available on every job site. It does not have to be posted. Double-insulated tools are not required to be grounded and do not have to be tested. The following tests will be performed on all cord sets, receptacles not part of the permanent wiring, and cord and plug-connected equipment required to be grounded:

- All equipment conductors will be tested for continuity and will be electrically continuous;
- Each receptacle and attachment cap or plug will be tested for correct attachment of the equipment grounding conductor and proper attachment of the hot and neutral wires; and
- The equipment-grounding conductor shall be connected to its proper terminal.

TEST PROCEDURES

Receptacles – Use receptacle tester to determine correct connections to terminals.

Cord Sets – First, plug cord set into properly wired receptacle, then plug receptacle tester into cord connector (receptacle) of cord set to determine both continuity of grounding conductor and correct connections to terminals.

Cord and Plug Connected Equipment – Use continuity tester. Connect or touch one terminal of continuity tester to metal frame of equipment or tool and the other terminal to grounding prong of attachment cap plug at end of the cord. A visual (light) signal of the tester indicates there is continuity of the grounding conductor. We further suggest this test also be made between metal frame and each of the other two prongs of the attachment cap plug. If there is a signal from this test, it indicates a possible ground fault and the tool should be checked further. Tests may be performed either at the job site or taken to the shop for testing. The requirements of these standards also apply to tools and cord sets owned by employees and used at the site.

Color-Coding

Upon completion of tests, color coding of all company-owned cord sets, receptacles, cord and plug connected tools shall be accomplished in the manner prescribed. To maintain uniformity, it is essential that the color code be followed as set forth on the chart. At the change of a quarter, and upon completion of the required three-month tests, previous quarter's color should be removed. All cord sets, receptacles, cord and plug connected tools without the proper color-coding for the quarter should be immediately removed from service until tested and color-coded.

Jan 1 – March 31: White

April 1 – June 30: Green

July 1 – September 30: Red

Oct 1 – Dec 31: Orange

Color identification will be colored tape, which will adhere to the cord sets, and cord and plug connected equipment. Colors should be located on cord sets and equipment as follows: Cord sets – next to each end of the set; cord and plug-connected equipment – on cord adjacent to the base of the equipment.

At the beginning of a new quarter, the previous quarter's color should be removed and the new color affixed. Cord sets and receptacles that are fixed and not exposed to damage should be checked quarterly and also color-coded.

All defective items shall be marked with a defective tool tag and taken out of service, unless repair is made immediately. The removal from service as well as the reinstatement into service should be recorded in the log. An inspection of all items covered under the Assured Grounding Program must be conducted during the beginning of each quarter. All equipment covered by this program must be tested and color-coded when it is brought onto the site, whether new or used.

INTEGRITY ENVIRONMENTAL SERVICES, INC.

HAZARDOUS COMMUNICATION PROGRAM

INTRODUCTION AND GENERAL STATEMENT

Almost every workplace contains some substance, which could pose potential health problems to employees if exposed to them in concentrations or in a manner not prescribed. Integrity Environmental Services, Inc. (Integrity) recognizes that its employees have the right and need to know the properties and potential safety and health problems of substances to which they may be exposed. With this policy, Integrity intends to ensure the transmission of necessary information to employees regarding substances in the workplace, pursuant to the Federal Occupational Safety and Health Act Hazard Communication Standard, 29 Code of Federal Regulations 1910.1200.

A hazardous substance is defined as any substance that is a physical hazard or a health hazard, i.e. compressed gases, explosives, flammables, oxidizers, carcinogens, toxins, irritants, or corrosives. Hazardous substances generally have a Material Safety Data Sheet (MSDS) provided by the manufacturer.

This policy is established to:

- a. Ensure compliance with the applicable state and federal standard.
- b. Safeguard the health and safety of employees of Integrity.
- c. Create guidelines to follow for implementation and maintenance of a hazard communication program.

The Hazard Communication Program for Integrity shall be administered by a Project Manager who has the responsibility of maintaining all records generated by the HazCom Program.

CHEMICAL INVENTORY AND MATERIAL SAFETY DATA SHEETS

Annual updates of the chemical inventory and information lists (CIL) are required. The warehouse manager shall complete and forward the updated CIL to the Safety Committee/ Project Manager no later than January 31 of each year. CIL's must be submitted in alphabetical order and shall be verified for completeness by the warehouse manager. Each CIL is subject to audit by the Safety Committee/ Project Manager.

A master CIL shall be created and maintained by the Safety Committee in a manner that will allow a listing of hazardous substances by building and manufacturer.

Each time the warehouse receives a new hazardous substance the substance must be added to the departmental CIL within 30 days. A copy of the CIL, along with the original copy of the Material Safety Data Sheet (MSDS) for the new substance, must be sent to the Safety Committee/Project Manager.

Material Safety Data Sheets (MSDS's) provide detailed information on a hazardous substance. The sheets include information such as product name (hazardous substance), chemical abstract service number(s), ingredients, physical data, fire and explosion hazard data, environmental and disposal information, health hazard data, first-aid instructions, and handling precautions.

The Warehouse Manager and Project Managers must assure that MSDS's for all hazardous substances in the work place are obtained. A copy of the MSDS's must be kept in the department and be readily accessible to employees who work with the hazardous substances. The original copies of MSDS's must be sent to the Safety Committee/Project Managers to be placed in the master file. Copies of the MSDS's should be placed in a filing cabinet, notebook, etc., and marked with an MSDS label available.

Purchase Orders for any hazardous substance, regardless of the quantity ordered, shall require that an MSDS be obtained. It is the responsibility of the ordering person to make every effort to obtain an MSDS from the manufacturer.

Jobsites that store hazardous substances for distribution to other jobsites must obtain MSDS's for these substances and prepare a CIL. When the warehouse or jobsite transfers a hazardous substance to another area, the Supervisor, Project Manager, or Warehouse Manager must assure that the receiving individual receives a copy of the MSDS. Likewise, if the Warehouse Manager prepares a substance by any process for distribution to another jobsite or individual, then the Warehouse Manager has assumed the role of the manufacturer and must prepare an MSDS for the substance. The Safety Committee/Project Manager shall assure that the above steps have been completed.

Should the jobsite supervisor dealing with hazardous substances become aware of any information that is significant in regard to the health hazard of a substance (that does not already appear on the MSDS), he/she must add the information to the MSDS within a period not to exceed 30 days. The supervisor must also report this information to the Safety Committee/Project Manager. The information will be added to the master file and reported in writing to the appropriate state agency for follow-up investigation with the chemical manufacturer.

SIGNS AND LABELS

All existing labels on containers of hazardous substances must remain intact. The labels must be legible and written in English. Where labels are not present or are not legible, a Hazardous Material Information System (HMIS) label will be affixed to those containers holding the hazardous substance.

It is the responsibility of the Warehouse Manager and Jobsite Supervisor to assure that each container of a hazardous substance in the workplace is marked, labeled or tagged with the:

- a. Common/trade name of the substance.
- b. Appropriate hazard warnings: health, flammability, reactivity, and personal protective equipment.
- c. Chemical abstract service number (CAS).

HMIS labels are available from the Warehouse Manager and/or Safety Committee/ Project Manager for this purpose.

Portable containers filled with hazardous chemicals transferred from a labeled storage container must be labeled if:

- a. The material is not used within the work shift of the employee making the transfer.
- b. The employee that made the transfer leaves the work area.
- c. The container is moved to another work area and is no longer in possession of the employee who filled the container.

Labels on portable containers are not required if the employee who made the transfer uses all of the contents during the work shift.

Storage tanks must be labeled with the identity of the substances that it contains. The label must show the health, flammability, reactivity, and physical hazards associated with the substance. The National Fire Protection Association (NFPA) rating system must be used to show these ratings.

Containers used by outside service contractors shall be properly labeled with either a manufacturer's label or an HMIS label prior to the use of the hazardous substance on Integrity's property or an Integrity jobsite property.

Employees that work in the warehouse areas, where sealed containers of hazardous substances are received for distribution to other jobsites, must assure that the manufacturer's labels are not defaced or removed. If the labels are removed or defaced, follow the procedure outlined above for replacement of the labels. In addition, if a spill or leak occurs in a container of hazardous substance, the employees should leave the area, go to a place of safety, and call the Project Manager for assistance. MSDS's for all substances in the warehouse must be obtained and be readily accessible to employees for these substances.

In addition to the labeling requirement for containers of hazardous substances, the area where the hazardous substance is used or stored must be properly marked. In order to accomplish this requirement, the Safety Committee has obtained the Uniform Laboratory Hazard Signage (ULHS) system. The signs identify the areas where hazardous substances are used or stored through pictograph symbols. The signs will warn employees and visitors that proper precautions should be observed when entering the area. The ULHS signs are available from the Master Record Keeper.

EXCLUSIONS

These regulations do not apply to any substances, which are foods, drugs, cosmetics, or tobacco products intended for personal consumption by the employees while in the workplace. Additionally, these regulations do not apply to any consumer products and food stuffs packaged for distribution to (and intended for use by) the general public. Consumer products are packaged and used as a normal consumer would use the product as defined in the Consumer Product Safety Act and Federal Hazardous Substances Act.

EXPOSURE

Exposure, or exposed, means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes potential (e.g. accidental or possible) exposure as referenced by the MSDS. When the employer discovers that an employee has received a potentially hazardous exposure to any substance or agent, the employer must immediately notify the employee and take such steps that may be necessary to provide medical evaluation, monitoring, or treatment. Likewise, an employee that has received a potentially hazardous exposure to a substance or agent must immediately notify the employer of such exposure.

After the appropriate safety and health precautions have been taken, it is the responsibility of the employee's supervisor to fill out an Employee Exposure Report (EER). EER forms are available from the Safety Committee/Project Manager. The completed EER should be submitted to the Safety Committee (original copy), with a copy provided to the employee.

The Safety Committee/ Project Manager will retain the original EER and send a copy to Human Resources. The Human Resources Office will place the EER in the employee's permanent personnel file to be retained for the length of employment plus 40 years.

An affected employee (or designated representative) may make a request to the Safety Committee/ Project Manager or Human Resources for access to copies of the appropriate CIL and MSDS's. Access to the appropriate CIL and MSDS's shall be granted within a reasonable time, place, and manner, but never later than one working day after the request for access is made. In addition, whenever an affected employee or designated representative requests a copy of the CIL and/or MSDS's, the Safety Committee/Project Manager shall, within 15 days, assure that either a copy or a mechanical means to copy is provided.

An employee that has requested information as stated in section above, and has not received the requested information within the specified time period, may refuse to work with the substances or refuse to work at the location for which the request was made. An employer may not discharge or initiate any adverse personnel action against any employee because the employee has exercised his/her right to the requested information. Furthermore, an employer may not request or require an employee to waive any rights under this policy. Any such waiver executed shall be null, void, and unenforceable.

Employees working in areas where exposure(s) to hazardous substances exist shall be required to perform their jobs in accordance with precautions communicated to them during training and education programs. A supervisor may take the appropriate disciplinary action when an employee does not comply with the precautionary measure this policy indicates.

The Department Head or designee shall be responsible for providing the following in all departmental areas having contact with hazardous substances:

- a. Chemical name of each hazardous substance.
- b. Correct labeling of each hazardous substance.

- c. Availability of any MSDS for each hazardous substance present in the immediate work area.
- d. Training and education of employees on work practices, protective measures, and emergency measures in the work place.

Periodic checks for program integrity will be made by means of an audit team comprised of personnel from the Safety Committee/ Project Managers.

TRAINING

All employees of Integrity must receive Hazard Communication training. All employees will include temporary, part-time, and full-time personnel. New employees will receive Hazard Communication training at the start of employment.

Managers shall inform their employees of the requirements of the Hazard Communication Standard (cover the four stages of the program), any operations in their department where hazardous substances are used, the location, and availability of the MSDS's and CIL. In addition, the training must cover the methods used to detect the presence of a substance released and the steps to take after the release is detected, the physical and health hazards in the work area, the measures and equipment used for personal protection, and the details of the written plan. The training must occur within 30 days of employment for new employees. Any time a new hazard is introduced into the workplace, employees must be trained on the hazard; and an annual retraining session is required for all employees.

Training and education provided to employees and others must be documented with detailed records of training maintained by the company. The training records must be kept for the length of employment plus 40 years. A copy of all training records must be sent to the Safety Committee/ Project Managers to be filed.

OUTSIDE CONTRACTOR'S RESPONSIBILITIES

Any time an outside contractor brings a hazardous substance(s) into the workplace, a CIL and MSDS(s) for the substance(s) must be received. Similarly, a CIL and MSDS(s) for all hazardous substances in the area that the contractor will be working must be provided to the contractor. This exchange will be coordinated by whoever is granting the contract. A contractor safety form must be signed stating the contractor agrees to this provision.

Outside contractors whose work or materials pose a health hazard to employees shall be responsible for the training and education requirements outlined under the training section of this policy.

The above cross-training must be documented and the records must be retained in the department where the work is performed. Copies of the cross-training records must also be sent to the Safety Committee/ Project Manager.

Outside contractors must comply with all the provisions of the Hazard Communication Standard while serving on Integrity property and jobsites. Periodic audits from the Safety Committee/ Project Managers will be performed to assure compliance.

INTEGRITY ENVIRONMENTAL SERVICES, INC.

HEARING CONSERVATION PROGRAM

Purpose

The purpose of this program is to ensure that hearing protection is provided and used when necessary.

Scope

This Hearing Conservation Program covers all Integrity Environmental Services, Inc. employees whose noise exposure equals or exceeds an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A Scale (slow response) or, equivalently, a dose of fifty percent. For purpose of this hearing conservation program, employee noise exposures shall be computed without regard to any attenuation provided by the use of personal protective equipment. Also, for purposes of this program, an 8-hour time-weighted average of 85 decibels or a dose of fifty percent shall be referred to as the action level.

Monitoring

Area monitoring shall be utilized to determine if a sound level equal to or exceeding the action level exists.

If the results of the area monitoring indicate a sound level equaling or exceeding the action level, personal sampling shall be performed on a representative sampling of personnel assigned to the area.

The results of the personal sampling shall be communicated to each employee exposed at or above the action level.

Employees assigned to any area in which the sound level equals or exceeds the action level shall be informed when noise measurements will be conducted in that area and shall be permitted to observe the measurements being conducted.

Audiometric Training Program

All employees whose exposures equal or exceed the action level shall participate in an audiometric testing program. All employees that are HAZWOPER trained, mechanics, and all truck drivers will receive a baseline audiogram during their pre-placement physical exam.

- Within 6 months of an employee's first exposure at or above the action level, a valid baseline audiogram shall be established.
- Where baseline audiograms are obtained more than 6 months after the employee's first exposure at or above the action level, employees shall wear hearing protectors for any period exceeding 6 months after the first exposure until the baseline audiogram is obtained.
- Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protectors may be used as a substitute for the requirement that baseline audiograms be preceded by 14 hours without exposure to workplace noise.

- All employees requiring a baseline audiogram shall be advised to avoid high levels of non-occupational noise exposure during the 14-hour period immediately preceding the audiometric examination.
- At least annually, a new audiogram shall be obtained for each employee exposed at or above the action level.
- Each employee's annual audiogram shall be compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred. A standard threshold shift is defined as a change in hearing threshold relative to the baseline audiogram of an average of 10dB or more at 2000, 3000, and 4000 Hz in either ear. The results shall be age adjusted.
- If the annual audiogram shows that an employee has suffered a standard threshold shift, a retest may be obtained within 30 days.
- If it is determined that a standard threshold shift has occurred, the employee shall be informed of this fact, in writing, within 21 days of the determination.

Noise Control

- Engineering controls will be utilized if the results of area monitoring indicate that an action level exists.
- Hearing protectors shall be made available to all employees exposed at or above the action level. The use of hearing protectors is mandatory for all employees exposed at or above the limits as specified in the attached table.
- Hearing protectors shall also be worn by any employee who is exposed to an 8-hour time-weighted average of 85 decibels or greater, and who has not yet had a baseline audiogram established or has experienced a standard threshold shift.
- The hearing protection attenuation will be evaluated using an approved method.
- Training in the use and care of all hearing protectors shall be provided to all employees required to use the same.

Training

- All employees who are exposed to noise at or above an 8-hour time-weighted average of 85 decibels are required to attend an annual training program.
- This training program shall include:
 - The effects of noise on hearing.
 - The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use and care.

- The purpose of audiometric testing, and an explanation of the test results.

Record Retention

- Noise exposure measurement records shall be retained for two years.
- Audiometric test records shall be retained in the medical record for 30 years after termination of employment.

**SOUND PRESSURE LEVEL
EXPOSURE LIMITS**

<u>Sound Pressure Level (decibels)</u>	<u>Time (Hours)</u>
80	32.0
81	27.9
82	24.3
83	21.1
84	18.4
85	16.0
86	13.9
87	12.1
88	10.6
89	9.2
90	8.0
91	7.0
92	6.1
93	5.3
94	4.6
95	4.0
96	3.5
97	3.0
98	2.6
99	2.3
100	2.0
101	1.7
102	1.5
103	1.3
104	1.1
105	1.0
106	0.87
107	0.76
108	0.66
109	0.57

<u>Sound Pressure Level (decibels)</u>	<u>Time (Hours)</u>
110	0.5
111	0.44
112	0.38
113	0.33
114	0.29
115	0.25
116	0.22
117	0.19
118	0.16
119	0.14
120	0.125
121	0.11
122	0.095
123	0.082
124	0.072
125	0.063
126	0.054
127	0.047
128	0.041
129	0.036
130	0.031

INTEGRITY ENVIRONMENTAL SERVICES, INC.

HEAT PREVENTION PROGRAM

HEAT STRESS

Wearing PPE puts a hazardous waste worker at considerable risk of developing heat stress. This can result in health effects ranging from transient heat fatigue to serious illness or death. Heat stress is caused by a number of interacting factors, including environmental conditions, clothing, workload, and the individual characteristics of the worker. Because heat stress is probably one of the most common (and potentially serious) illnesses at hazardous waste sites, regular monitoring and other preventive precautions are vital.

Individuals vary in their susceptibility to heat stress. Factors that may predispose someone to heat stress include:

- ×Lack of physical fitness.
- ×Lack of acclimatization.
- ×Age.

- ×Dehydration.
- ×Obesity.
- ×Alcohol and drug use.
- ×Infection.
- ×Sunburn.
- ×Diarrhea.
- ×Chronic disease.

Reduced work tolerance and the increased risk of excessive heat stress are directly influenced by the amount and type of PPE worn. PPE adds weight and bulk, severely reduces the body's access to normal heat exchange mechanisms (evaporation, convection, and radiation), and increases energy expenditure. Therefore, when selecting PPE, each item's benefit should be carefully evaluated in relation to its potential for increasing the risk of heat stress. Once PPE is selected, the safe duration of work/rest periods should be determined based on the:

- Anticipated work rate.
- Ambient temperature and other environmental factors.
- Type of protective ensemble.
- Individual worker characteristics and fitness.

Monitoring

In general, workers should be monitored when the temperature in the work area is above 70°F (21°C).

Perhaps the easiest measurement to use in the field is heart rate.

Count the radial pulse during a 30 second period as early as possible in the rest period.

- If the heart rate exceeds 110 beats per minute at the beginning of the rest period, shorten the next work cycle by one-third and keep the rest period the same.
- If the heart rate still exceeds 110 beats per minute at the next rest period, shorten the following work cycle by one-third.

Another easy to use field measurement is oral temperature. Use a clinical thermometer (3 minutes under the tongue) or similar device to measure the oral temperature at the end of the work period (before drinking).

- If oral temperature exceeds 99.6°F (37.6°C), shorten the next work cycle by one-third without changing the rest period.
- If oral temperature still exceeds 99.6°F (37.6°C) at the beginning of the next rest period, shorten the following work cycle by one-third.

Never allow a worker to wear PPE if his/her oral temperature exceeds 100.6°F (38.1°C).

If possible, one can also measure body water loss. Measure weight on a scale at the beginning and end of each workday to see if enough fluids are being taken to prevent dehydration. Weights should be taken while the employee wears similar clothing or, ideally, is nude. *The body water loss should not exceed 1.5 percent total body weight loss in a workday.*

Initially, the frequency of physiological monitoring depends on the air temperature adjusted for solar radiation and the level of physical work (see Table 1). The length of the work cycle will be governed by the frequency of the required physiological monitoring.

Prevention

Proper training and preventive measures will help avert serious illness and loss of work productivity. Preventing heat stress is particularly important because once someone suffers from heat stroke or heat exhaustion, that person may be predisposed to additional heat injuries. To avoid heat stress, management should take the following steps:

Adjust work schedules:

- Modify work/rest schedules according to monitoring requirements.
- Mandate work slowdowns as needed.
- Rotate personnel: alternate job functions to minimize overstress or overexertion at one task.
- Add additional personnel to work teams.
- Perform work during cooler hours of the day if possible or at night if adequate lighting can be provided.
- Provide shelter (air-conditioned, if possible) or shaded areas to protect personnel during rest periods.
- Maintain workers' body fluids at normal levels. This is necessary to ensure that the cardiovascular system functions adequately. Daily fluid intake must approximately equal the amount of water lost in sweat, i.e., 8 fluid ounces (0.23 liters) of water must be ingested for approximately every 8 ounces (0.23 kg) of weight lost. The normal thirst mechanism is not sensitive enough to ensure that enough water will be drunk to replace lost sweat. When heavy sweating occurs, encourage the worker to drink more. The following strategies may be useful:
 - Maintain water temperature at 50° to 60°F (10° to 15.6°C).
 - Provide small disposable cups that hold about 4 ounces (0.1 liter).
 - Have workers drink 16 ounces (0.5 liters) of fluid (preferably water or dilute drinks) before beginning work.
 - Urge workers to drink a cup or two every 15 to 20 minutes, or at each monitoring break. A total of 1 to 1.6 gallons (4 to 6 liters) of fluid per day are recommended, but more may be necessary to maintain body weight.
 - Weigh workers before and after work to determine if fluid replacement is adequate.

Encourage workers to maintain an optimal level of physical fitness:

- Where indicated, acclimatize workers to site work conditions: temperature, protective clothing, and workload.
- Urge workers to maintain normal weight levels.

Provide cooling devices to aid natural body heat exchange during prolonged work or severe heat exposure. Cooling devices include:

- Field showers or hose-down areas to reduce body temperature and/or to cool off protective clothing.
- Cooling jackets, vests, or suits.

Train workers to recognize and treat heat stress. As part of training, identify the signs and symptoms of heat stress (see Table 2).

Table 1. Suggested Frequency of Physiological Monitoring for Fit and Acclimatized Workers^a

ADJUSTED TEMPERATURE ^b ENSEMBLE	NORMAL WORK ENSEMBLE ^c	IMPERMEABLE
90°F (32.2°C) or above	After each 45 minutes of work	After each 15 minutes of work
87.5° - 90°F (30.8° - 32.2°C)	After each 60 minutes of work	After each 30 minutes of work
82.5° - 87.5°F (28.1° - 30.8°C)	After each 90 minutes of work	After each 60 minutes of work
77.5° - 82.5°F (25.3° - 28.1°C)	After each 120 minutes of work	After each 90 minutes of work
72.5° - 77.5°F (22.5° - 25.3°C)	After each 150 minutes of work	After each 120 minutes of work

- a For work levels of 250 kilocalories/hour.
- b Calculate the adjusted air temperature (ta &adj) by using this equation: $ta_{adj} \text{ } ^\circ\text{F} = ta \text{ } ^\circ\text{F} + (13 \times \% \text{ sunshine})$. Measure air temperature (ta) with a standard mercury-in-glass thermometer, with the bulb shielded from radiant heat. Estimate percent sunshine by judging what percent time the sun is not covered by clouds that are thick enough to produce a shadow. (100 percent sunshine = no cloud cover and a sharp, distinct shadow; 0 percent sunshine = no shadows.)
- c A normal work ensemble consists of cotton coveralls or other cotton clothing with long sleeves and pants.

Table 2. Signs and Symptoms of Heat Stress

Heat rash may result from continuous exposure to heat or humid air.

Heat cramps are caused by heavy sweating with inadequate electrolyte replacement. Signs and symptoms include:

- muscle spasms
- pain in the hands, feet, and abdomen

Heat exhaustion occurs from increased stress on various body organs including inadequate blood circulation due to cardiovascular insufficiency or dehydration. Signs and symptoms include:

- pale, cool, moist skin
- heavy sweating
- dizziness
- nausea
- fainting

Heat stroke is the most serious form of heat stress. Temperature regulation fails and the body temperature rises to critical levels. Immediate action must be taken to cool the body before serious injury and death occur. Competent medical help must be obtained. Signs and symptoms are:

- red, hot, unusually dry skin
- lack of or reduced perspiration
- nausea
- dizziness and confusion
- strong, rapid pulse
- coma

INTEGRITY ENVIRONMENTAL SERVICES, INC.

HOT WORK PROGRAM

Hot Work

All hot work (welding, cutting, brazing, etc.) must be approved by the supervisor. The supervisor must complete a hot work permit prior to beginning any hot work. The permit shall be prominently displayed in the area where the work is to be performed.

Welding in tanks or other confined spaces must comply with the confined space program.

Mechanical ventilation may be required in confined areas.

Prior to beginning the hot work, the person in charge needs to inspect the work area to ensure all combustible materials within a 35 foot radius have been removed. If it is not possible to remove all fire hazards, the following precautions need to be taken:

- guards should be used to confine the heat, sparks, slag, and
- a fire extinguisher shall be placed for instant use.

In addition, if there is the potential for anything other than a minor fire, a fire watch needs to be employed. The firewatcher

- has to have fire extinguishing equipment readily available,
- must be trained in fire extinguisher use, and
- must remain in the area for at least 30 minutes after the hot work has been completed (including lunch, during breaks, etc.).

Whenever possible, protective blinds or welding screens will be placed so as to block the weld flash from other workers.

Appropriate eye protection (ANSI Z87.1 approved lenses) must be worn for the specific task (welding helmets, brazing goggles, etc.)

All cylinders must be stored in a vertical position when not in use. If a cylinder was in a horizontal position, it must be placed in the vertical position at least one hour before use. Regulators must be removed and protective caps must be in place.

Oxygen cylinders must be stored at least 20 feet from acetylene cylinders, or separated by a fire wall or other barrier. The barrier must be at least 5 feet tall and have a minimum one hour fire rating.

Acetylene cylinders should never have more than 15 psi gauge pressure. When opening an acetylene valve, you should only open the valve 3/4 of a turn. Acetylene valves should NEVER be opened more than 1 1/2 turns.

INTEGRITY ENVIRONMENTAL SERVICES, INC.

LOCKOUT TAGOUT PROGRAM

Introduction

The control of hazardous energy sources is commonly called "Lockout/Tagout." Locks are used to render controls inoperative and tags warn others that workers are doing service work on unguarded parts of the equipment.

OSHA and The Bureau of Labor Statistics found that 74% OF ALL FATAL ACCIDENTS WERE TRACED TO EMPLOYERS EITHER NOT HAVING OR EMPLOYEES NOT FOLLOWING LOCKOUT PROCEDURES. It is important to note that many accidents in the study did not occur during repairs. The break down of tasks being done at the time of accident is as follows:

Unjamming Object	25%
Cleaning Equipment	22%
Repairing Equipment	12%
Adjusting Equipment	12%

Doing Set-Up Work	8%
Inspecting Equipment	8%
Other	13%

Title 29 Code of Federal Regulations Part 1910.147 covers the servicing and maintenance of machines and equipment in which the unexpected energization or start-up of machines or equipment, or release of stored energy could cause injuries to employees.

Purpose

This procedure established the minimum requirements for the lockout or tagout of energy isolating devices. It shall be used to ensure that the machine or equipment is isolated from all potentially hazardous energy, and locked out or tagged out before employees do any servicing or maintenance activities where the unexpected energization, start-up or release of stored energy could cause injury.

Responsibility

Appropriate employees shall be instructed in the safety significance of the lockout/tagout procedure. The regulation identified three classes of key personnel to be accounted for, the employer, authorized employees, and affected employees.

Only authorized employees may initiate lockout/tagout procedures and do equipment servicing requiring lockout. Integrity's job categories include: drivers, technicians, and mechanics. Affected employees are those who operate equipment subject to lockout/tagout, or whose job duties place them near equipment and machines subject to lockout/tagout. Again, job categories include: drivers, technicians, and mechanics.

Each new or transferred employee affected and other employees whose work operations are or may be in the area shall be instructed in the purpose and use of the lockout or tagout procedure.

Preparation for Lockout or Tagout

Make a survey to locate and identify all isolating devices to be certain which switch(es), valve(s) or other energy isolating devices apply to the equipment to be locked or tagged out. More than one energy source (electrical, mechanical, hydraulic, pneumatic, gravity, chemical, and thermal) may be involved.

Lockout/tagout equipment is issued to each employee. There are several pieces of equipment available such as single key padlocks, lock hasps for multiple lockout locations, chains and warning tags.

Sequence of Lockout or Tagout System Procedure

(1) NOTIFICATION

Notify all affected employees that a lockout or tagout system is going to be used and the reason therefore. The authorized employee shall know the type and amount of energy that the machine or equipment uses and shall understand the hazards of it.

(2) EQUIPMENT SHUTDOWN

If the machine or equipment is operating, shut it down by the normal stopping procedure (depress the stop button, open the toggle switch, etc.).

(3) EQUIPMENT ISOLATION

Operate the switch, valve, or other energy isolating device(s) so that the equipment is isolated from its energy source(s). Stored energy (such as that in springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure, etc.) must be dissipated or restrained by methods such as repositioning, blocking, bleeding down, etc.

(4) LOCKING AND TAGGING POINTS OF CONTROL

Lockout and/or tagout the energy isolating devices with assigned individual lock(s) or tag(s).

(5) THE DISPELLING OF STORED ENERGY

After ensuring that no personnel are exposed, and as a check on having disconnected the energy sources, operate the “start” or “on” button or other normal operating controls to make certain the equipment will not operate.

CAUTION: Return operating control(s) to "neutral" or "off" position after the test.

(6) LOCKOUT VERIFICATION

The equipment is now locked out or tagged out.

Restoring Machines or Equipment to Normal Production Operations

After the servicing and/or maintenance is complete and equipment is ready for normal production operations, check the area around the machines or equipment to ensure that no one is exposed.

After all tools have been removed from the machine or equipment, guards have been reinstalled and employees are in the clear, remove all lockout or tagout devices. Operate the energy isolating devices to restore energy to the machine or equipment.

Procedure Involving More Than One Person

In the preceding steps, if more than one individual is required to lockout or tagout equipment, each shall place his/her own lockout device or tagout device on the energy isolating device(s). When an energy isolating device cannot accept multiple locks or tags, a multiple lockout or tagout device (hasp) may be used. If lockout is used, a single lock may be used to lockout the

machine or equipment with the key being placed in a lockout box or cabinet that allows the use of multiple locks to secure it. Each employee will then use his/her own lock to secure the box or cabinet. As each person no longer needs to maintain his or her lockout protection, that person will remove his/her lock from the box or cabinet.

Basic Rules for Using Lockout or Tagout System Procedures

All equipment shall be locked out or tagged out to protect against accidental or inadvertent operation when such operation could cause injury to personnel. Do not attempt to operate any switch, valve, or other energy isolating device that is locked or tagged out.

INTEGRITY ENVIRONMENTAL SERVICES, INC

PPE POLICY

PERSONAL PROTECTIVE CLOTHING POLICY

I. PURPOSE

The elimination of unsafe acts, conditions and procedures with regard to the operation of our business is of paramount importance. Every effort must be made to develop and maintain a safe and healthy environment for employees and customers alike. To that end, the purpose of these guidelines is primarily concerned with protecting our employees from injury and illness while in the course of their daily work responsibilities. However, all employees must be aware of their appearance to customers we visit, as well as our abilities, in order to satisfy their service needs, their perceptions and our image as professionals.

II. RESPONSIBILITY

Whatever your position, Integrity considers you the most important person on our safety team. It is your responsibility to respect fellow employees and follow all established company safety rules. Any employee that disregards company and/or government regulations may be subject to disciplinary actions, including termination.

III. GUIDELINES

Safety Glasses

Safety Glasses, chemical slash goggles, or face shields are required for most situations. The company will provide safety eyewear. If corrective lenses are needed, you are eligible to receive a new pair of prescription safety glasses once every two years. Safety eyewear will be worn in potential eye injury exposure situations. Safety eyewear is required, but not limited to, the following:

* At all times in the TSDF.

- * At all remote job sites.
- * Grinding, sanding, drilling
- * All welding and brazing operations (welding helmets required)
- * Painting (spray or brush/roller)
- * When using compressed air and impact air tools.
- * Performing vehicle preventative maintenance.
- * When using the chop saw, saw-zall and torch cutting operations.
- * When handling lead-acid batteries (secondary face shield also recommended)
- * When handling any open containers of chemicals.
- * When cleaning parts with solvents.
- * Scraping operations

Safety Shoes

Employees are required to have and wear safety shoes whenever they are performing their normal job functions or are working as a designated representative of the company. Authorized footwear (an ANSI Z41 approved safety shoe with all leather upper with steel toe and a sole of 1/4" or greater) must be worn during an employee's scheduled work hours when in shop areas, on a job site, and involved in transportation. Specific job classes required to wear safety shoes are:

- * All operations staff
- * Field service staff
- * Project managers
- * TSDf employees
- * IR response personnel
- * Drivers

Metatarsal guards are required for any employee involved in drum handling activities on a regular basis, i.e., TSDf personnel and OTR drivers performing drum pick ups.

Support personnel (i.e., sales, marketing, accounting, customer services, administrative staff, etc.) who on occasion visit the facility or shop areas must meet minimum requirements (NO open toe or heel shoes, NO sandals, NO slippers, NO canvas shoes or moccasins).

Hearing Protection

Hearing protection is required in noisy environments where sound levels are greater than 85 dBA. Hearing protection is provided at no cost to the employee.

Uniforms/Clothing

Work clothing should be suitable for your particular job. Rings and other jewelry should not be worn by the immediate response staff, the field service staff, shop personnel, or TSDf personnel. Those employees required to wear uniforms and/or Nomex coveralls will be issued uniforms. Uniforms are to be laundered and kept at the responsibility of employees.

- * Employees will not be reimbursed for damages to personal clothing. Employees are responsible for maintaining company provided clothing while in the employee's possession.
- * Alternative staff (Project Managers, etc. are eligible for work coveralls per Supervisor approval).

Respiratory Protection

Integrity has many employees using various types of respiratory protection, including but not limited to air-purifying respirators; supplied air respirators; combination Air-line respirators with auxiliary self-contained air supply; and self-contained breathing apparatus on a mandatory or optional basis in routine and emergency use situations. Our program is in accordance with 29 CFR 1910.134 and ANSI Z88.2-1980 to protect employees against the inhalation of harmful air contaminants and against oxygen deficient atmospheres when effective engineering controls are not feasible. Employees will use respiratory protection in accordance with prescribed procedures and training, guard against damage to respirators, report any malfunction of the respirator to supervision, and perform a self fit test each time a respirator is worn using techniques demonstrated during the respirator training.

Additional PPE

PPE such as hard hats, gloves, and chemical resistant clothing provided by the company are furnished to present the first line of defense of against injury and illness. Each employee is required to wear any and all PPE provided when instructed to do so. This equipment is to be properly maintained, properly fitted and used only for the specific application intended.

INTEGRITY ENVIRONMENTAL SERVICES, INC.

PPE PROCEDURE

In all levels of protection, different protection options are available, it is important to identify what level of protection is needed for the task at hand. Following are outlines of levels of protection that will be followed by Superior Special Services.

Level "A"

Level A calls for maximum available protection. It requires use of general cotton work uniforms with a positive pressure self-contained breathing apparatus and the use of a gas tight total encapsulating chemical protective suit. Level A is protection against skin contact. The self-contained breathing apparatus is worn inside an expanded back suit to protect the unit against contamination. In special instances, an airline-ducted suit can be used for a supplied air positive pressure-breathing device.

There are two types of Level A suits permitted as part of this guideline. One is the reusable Level A gas tight suit. An example being Teflon coated Nomex or Viton rubber. These suits must be properly decontaminated and tested for permeation before another use in the field is permitted. The second type of Level A suit is the one time disposal or limited use suit. An example being Life Guards "Responder" or Chemron "Chemrel Max." These suits are one time use only and are to be destroyed after use and immediately replaced.

It is important to realize whatever type of suit is chosen that it is applicable to the chemical involved. In addition to proper suits and under garments, proper boots and hand protection must be used.

Level "B"

Level B protection is required when the highest level of respiratory protection is needed but a lesser level of skin protection is applicable.

Self contained or supplied air positive pressure breathing apparatus must be implemented but can be used with a lighter yet appropriate chemical resistant garment over general cotton work uniform. As with level A, it is important to ensure that the suit material is resistant and applicable to the chemicals involved.

Level B is the minimum level of protection that will be allowed for initial site entries, and will only be used when the contaminants and their constituents are known. In addition to the suit and respiratory protection, proper boots and gloves will be used as applicable.

Level "C"

Level C protection includes general cotton work uniform under a protective coverall with a negative or powered air purifying respiratory of negative or positive pressure. Level C protection includes a full facepiece respiratory as described above and appropriate chemical resistant clothing. In addition to the above equipment, proper boots and gloves appropriate and applicable for the proper protection must also be worn.

Negative pressure or powered air purifying respirators should only be used when the contaminants and their specific concentrations are known, and will remain at constant levels throughout the work stages. In Level C protection, the proper cartridge selection is vital to protect against individual constituents contamination. Level C respirators must only be used in atmospheres which contain at least 19.5 percent oxygen by volume, and where the contaminants do not exceed those recommendations stated on the cartridge. It is important that a qualified individual make the selection of the proper protection for Level C.

Level "D"

Level D protection is generally used where not special chemical skin or respiratory protection is needed. Normally all that is worn is a general cotton work uniform.

In all the above levels of protection, various options are available for additional protection or ease of decontamination. Examples being head protection, chemical splash hoods, fore entry aluminized suit, meal or mesh cover glove, boot covers and over-gloves.

It is essential that anyone doing initial entry or other work in any level of protection be fully trained and familiar with specific site needs and contamination levels. All levels of protection have limitations, it is important that these be recognized. There are many factors that must be taken into consideration when determining the proper level of protection needed. Selection of protective gear must be made by qualified individuals.

INTEGRITY ENVIRONMENTAL SERVICES, INC

RESPIRATOR PROTECTION PROGRAM

I. PURPOSE

This written program provides guidance on the selection, use and maintenance of respirators, including the employee medical/training requirements of the Integrity Environmental Services Respiratory Protection Program following 29 CFR 1910.134 and ANSI Z88.2-1980. This program will insure protection of Integrity employees against the inhalation of harmful air contaminants and against oxygen deficient atmospheres when effective engineering controls are not feasible.

II. SCOPE

These guidelines covers any Integrity employee using any type of respiratory protection, including, but not limited to, maintenance-free, disposable dust masks; air-purifying respirators; supplied air respirators; combination air-line respirators with auxiliary self-contained air supply; and self-contained breathing apparatus on a mandatory or optional basis in routine and emergency use situations.

III. RESPONSIBILITY

- A. The Safety Committee is responsible for overall administration of the Respiratory Protection Program, including evaluation of the work environment for potential hazards, respirator selection, employee medical surveillance, training and fit-testing.
- B. The Project Manager, in conjunction with the Safety Committee, is responsible for project-specific environmental monitoring and respirator selection. The Project Manager is also responsible for ensuring compliance with Integrity's respirator policy at his/her job site.

- C. The Safety Committee is responsible for periodically auditing the use of respirators at various job sites to insure compliance with established guidelines, procedures, and applicable regulations.
- D. The Safety Committee and each supervisor are responsible for insuring that respirator users under their supervision have been provided the proper medical surveillance, training, and fit-testing before using any type of respiratory protection.
- E. Each supervisor must be knowledgeable in which specific areas and tasks under their jurisdiction require respiratory protection and the minimum number of qualified employees required to staff those requirements.
- F. Supervisors are responsible for insuring that employees under their direct supervisor wear the necessary respiratory protective equipment.
- G. Employees are responsible for reporting any problems associated with the use of respirators and new conditions that may require investigation for respiratory protection to their Supervisor and the Safety Committee.
- H. Employees will use respiratory protection following prescribed procedures and training, guard against damage to respirators, and report any malfunction of the respirator to supervision. Employees are responsible for self fit-testing respirators each time a respirator is worn, using techniques showed during their respirator training.
- I. Any employee that disregards company and/or government regulations may be subject to disciplinary actions, including termination.

IV. RESPIRATOR SELECTION

- A. Respirators selected for use must be approved by the National Institute for Occupational Safety and Health (NIOSH) or the Mine Safety and Health Administration (MSHA) and properly labeled or color coded per the requirements of OSHA 29 CFR 1910.134 (g).
 - 1. A respirator approval is nullified when:
 - a. Components between different types and makes of respirators are mixed.
 - b. Non-approved components are used.
 - c. An approved respirator is used in atmospheric concentrations for which it is not approved.

- B. Respirator selection will be based on the potential hazard(s) to which the user may be exposed. The selection must require consideration of:
 - 1. Nature, extent of, and adverse health effects of a hazard or characteristics of hazardous operation.
 - a. Oxygen deficient
 - b. Chemical properties
 - c. Physiological effects
 - d. Toxic material's concentrations
 - e. PEL's or TLV's
 - f. IDLH
 - g. Warning properties of a chemical contaminant
 - 2. Air contaminant concentration in areas that may be used to supply respirable air.
 - 3. Time for respirator use and activity level of user.
 - 4. Physical characteristics and limitations of respirator types.
 - 5. Respirator protection factors and respirator fit.
- C. Respirators selected for use must be approved by the Safety Committee before purchase.
- D. Only manufacturer specified replacement parts will be used for repair. Repair parts cannot be interchanged between various manufacture's respirators.
- E. Supplied air will meet the quality specification for a minimum of Grade D breathing air.

V. MEDICAL EVALUATION

- A. Employees must not be provided or use respiratory protection without prior written certification stating the employee can use respiratory protection.
- B. Determination of medical certification for respirator use shall be made by a certified physician or other qualified medical personnel under the direction of a certified physician.
- C. Repeat medical evaluations shall be conducted for all respirator users on an annual basis or as determined by the direction of the certified physician.

- D. Records of each employee respirator medical evaluation are maintained with the employee's medical file. Maintenance of medical records will follow OSHA 29 CFR 1910.120, and 1910.134.

VI. RESPIRATOR TRAINING

- A. Before use of any respirator, the employee must be trained in the proper use of the respirator. Training must be given on each type of respirator that the employee will use.
- B. The direct supervisor of an employee wearing respiratory protection must be knowledgeable in the proper use of the respirator and have received at least the same amount of training as received by the employee.
- C. Respirator training must be done by a competent individual who is knowledgeable about Integrity's respiratory protection program, requirements of applicable State and Federal regulations, and must include at least the following information:
 - 1. Instruction in nature, extent, and effects of respiratory hazards.
 - 2. Discussion about why a particular respirator is used.
 - 3. Discussion of respirator capabilities and limitations.
 - 4. Instructions in how to inspect, wear and remove the specific respirator.
 - 5. Instruction in testing for leaks.
 - 6. Instruction in how to recognize any potential problems with the respirator.
 - 7. Explanation of the procedures for maintenance and storage of the respirator.
 - 8. General provisions of OSHA 29 CFR 1910.134 and the Integrity Environmental Services, Inc. Respiratory Protection Program.
- D. Besides the initial training, refresher training must be given to respirator wearers on an annual basis. Refresher training will be a review of the topics presented in the initial training. In addition, any changes associated with respiratory protection equipment and work practices will be addressed.
- E. All training will be documented. The records will be maintained with medical records following OSHA 29 CFR 1910.120 and 1910.134.

VII. FIT TESTING

- A. Upon initial job assignment fit-testing will be done by the Safety Committee. Employee respirator training for all types of respirators will be done.
- B. Fit-testing must include instruction on negative and positive pressure tests as appropriate for the specific respirator.

- C. Fit test evaluation will be made using recognized qualitative fit-testing procedures and irritant smoke.
- D. An acceptable fit is achieved if the respirator wearer is unable to detect penetration of the test agent into the respirator.
- E. Self fit-checking should be done by the employee each time the respirator is worn, using the techniques showed during the respirator training.
- F. Fit-testing must include a series of exercises such as normal breathing, deep breathing, turning head from side to side, nodding head up and down, talking, or other activities that may simulate actual working conditions, to insure a proper seal always.
- G. Employees cannot use or be fit-tested for tight-fitting respirators that require a seal for effective performance when facial hair or other conditions prevent the seal. Besides a beard, other conditions that may prevent a seal include absence of normally worn dentures, facial shape, facial scars, or eyewear that projects under the face piece seal.
- H. Beards and/or facial hair that interfere with the respirator-sealing surface is strictly prohibited.
- I. Contact lens must not be worn with in combination with full-face respirator masks. Respirator users will be issued a pair of prescription spectacle kits if they are required to wear a full-face respirator and use prescription glasses.
- J. A respirator-training document will be completed following training and acceptable fit testing of each respirator make/model.
- K. Records of respirator training will be maintained with the employee's training file.
- L. Fit-testing and training will be conducted at least annually.

VIII. ISSUANCE OF RESPIRATORS

- A. Employees will be issued respiratory protection known to provide adequate protection from the type and concentration of potential exposure.
- B. Issuance of respirators shall be controlled to insure that the employee being issued a respirator has had an updated respiratory medical evaluation, training, and fit-testing for the specific respirator needed.
- C. It is the employee's responsibility to wear and properly maintain the respirator assigned to them.

IX. MAINTENANCE AND CARE OF RESPIRATORS

- A. Replaceable cartridge type respirators assigned for individual use should be stored in a resealable plastic bag or other clean location between usage. All respirators must be periodically washed and sanitized as deemed appropriate based on the activities, contaminants and concentrations the respirator is used for. Each individual is responsible for cleaning his/her respirators.
- B. Cartridges shall be replaced when efficiency is lost or after each use.
- C. Inspection of the individual's respirator should be made by the respirator user before and after each use.
- D. Cleaning procedures include:
 - 1. Removing and dismantling of any face piece replaceable parts.
 - 2. Washing face piece and associated parts in a warm, soapy solution or commercially available respirator cleaning solution.
 - 3. Rinsing face piece and parts in a sanitizing solution.
 - 4. Air drying.
 - 5. Inspecting face piece and parts prior to re-assembly.
 - 6. Covering a respirator with a plastic bag or other clean storage container.
- E. Replacement of worn or damaged respirator parts will be made only with manufacturer-designated replacement parts.
- F. Self-contained breathing apparatus and hip-air units will be inspected monthly. Dated records of inspections and repairs will be maintained at each location.
- G. All respirators shall be stored to protect against dust, dirt, sunlight, extreme heat or cold, and excessive moisture. Storage measures that can be used to protect respirators against dusts, chemicals, and moisture include:
 - 1. Hermetically sealed plastic bags, or plastic bags that can be sealed.
 - 2. Plastic containers with tight fitting lids, such as freezer containers.
 - 3. Cans with tight-fitting lids.

X. INSPECTION AND MAINTENANCE

- A. **SCBA's**
 - 1. Check the face piece and breathing hose for integrity.
 - 2. Check the air pressure for the cylinder. Also, check integrity of the regulator, harness assembly, and all straps and buckles.

3. Ensure that the regulator and warning devices (end-of-service alarm) function properly.

B. Air Purifying Respirators

1. Check rubber face piece for dirt, pliability of rubber, deterioration, and cracks, tears, or holes.
2. Check straps for breaks, tears, loss of elasticity, broken attachment snaps and proper tightness.
3. Check valves (exhalation and inhalation) for holes, warping, cracks, and dirt.
4. Check filters, cartridges and canisters for dents, corrosion and expiration dates. Check protection afforded by canister and its limitations.

C. All respirators must be inspected routinely before and after each use. A respirator that is not routinely used but is kept ready for emergency use must be inspected after each use and at least monthly to assure that it is in satisfactory working condition.

D. Self-contained breathing apparatus will be inspected monthly, air cylinders shall be fully charged to the manufacturer's instructions. Check for proper functioning of the regulator and the audible alarm.

E. Respirator inspection must include a check of the tightness of connections and the condition of the facepiece, headbands, valves, connecting tube, and canisters. Rubber or elastomer parts shall be inspected for pliability and signs of deterioration. Stretching and manipulating rubber or elastomer parts with a massaging action will keep them pliable and flexible and prevent them from taking a set during storage.

F. A record will be kept of inspection dates and findings. The records will be kept with the particular piece of equipment until the sheet has been completely filled in. Once an inspection sheet is complete, the records will be forwarded to the Safety Committee

XI. SAFE USE OF RESPIRATORS

A. In areas where the respirator wearer, with failure of the respirator, could be overcome by a toxic or oxygen deficient atmosphere, at least one additional employee must be present.

B. Communications (visual, voice, or signal line) must be maintained between all of the employees present.

- C. One employee must stay unaffected from any likely incident and have the proper rescue equipment to be able to help the other employees in case of an emergency.
- D. A standby person must be present with suitable rescue equipment when SCBA's or Supplied Air respirators are used in atmospheres immediately dangerous to life or health.
- E. When SCBA's or Supplied Air respirators are used in atmospheres immediately dangerous to life or health, employees must be equipped with a safety harness and safety lines for lifting or removing persons from hazardous atmospheres.
- F. A standby person with a suitable SCBA must be at the nearest fresh air base for an emergency rescue.

XII. EVALUATION OF THE RESPIRATOR PROGRAM EFFECTIVENESS

- A. Periodic evaluation of the effectiveness of the Respiratory Protection Program is essential to ensure that employees are being provided with adequate respiratory protection.
- B. The effectiveness of the Respiratory Protection Program will be evaluated at least annually and corrective action will be taken to correct any problems found in the program.
- C. Respirator wearers will be consulted periodically about their acceptance of wearing respirators. Many factors affect the acceptance of wearing respirators. These factors include: comfort, resistance to breathing fatigue, interference with vision, interference with communication, restriction of movement, interference with job performance and confidence in the effectiveness of the respirator to provide adequate protection.
- D. Frequent inspections will be conducted to ensure that proper types of respirators are selected, that respirator wearers are trained properly, that the correct respirators are issued and used, that respirators are worn properly, that respirators being used are in good operating condition, that respirators are inspected and maintained properly, that respirator storage is satisfactory, and that respiratory hazards are monitored using the proper equipment.
- E. The results of the evaluation will be used to decide the effectiveness of the program. Action will be taken to correct any defects found in the Respiratory Protection Program.

TYPES OF RESPIRATORY PROTECTION

The type of respiratory protection used will be based on respiratory hazards such as:

- | | | |
|-----|-----------------------|--|
| (1) | Oxygen Deficiency - | Normal - 20.9%
Minimum allowable - 19.5%
Maximum allowable - 23.5% |
| (2) | Toxic Contaminants - | Asbestos, dust, fumes, mist, gases, and vapors |
| (3) | Unknown Atmospheres - | Spills, IDLH atmospheres, or unknowns |

AIR-PURIFYING RESPIRATORS

- * Removes Air Contaminants

Limitations:

- * Does not supply oxygen - Use only in adequately ventilated areas containing at least 19.5% oxygen.
- * Contaminant level constraints - Do not use when concentrations of contaminants are unknown, exceed the rated capacity of the cartridge, or in atmospheres immediately dangerous to life or health.
- * Breathing demand of the wearer.
- * Contaminant does not exhibit adequate warning properties (including odor, eye and/or respiratory irritation).

Leave area immediately if:

- (1) Breathing becomes difficult
- (2) Dizziness or other distress occurs
- (3) You taste or smell contaminant

Replacing Cartridges

The following conditions are indications that the cartridges have served their useful life and should be replaced:

- * Odor or taste of gases or vapors
- * Eye, nose, or throat irritation
- * Inhalation difficulty

To replace cartridges proceed as follows:

- (1) Remove both cartridges and discard.
- (2) Remove the replacement cartridges from storage bags and insert into the threaded receptacles making sure gaskets are in place in the cartridge holders.
- (3) Carefully hand-tighten the cartridges to prevent damage to threads and to insure a good seal against the gaskets.

SELF-CONTAINED BREATHING APPARATUS (SCBA)

- * Approved for entry into an IDLH atmosphere, or unknown concentration area using the cylinder as your only breathing supply.

Limitations:

- * Bulky and heavy (may reduce work capacity in heavy or strenuous conditions).
- * Limited air supply (30 minutes).

DUAL-PURPOSE SCBA

- * Approved for entry into an IDLH atmosphere or unknown concentration area using only the cylinder in applications such as emergency rescue.
- * Work within the area for an extended time using air from the supply line.
- * Work within the area for an extended time using air from the supply line.

Limitations

- * Bulky and heavy (may reduce work capacity in heavy or strenuous conditions).

SUPPLIED AIR RESPIRATORS

- * Air supply must be independent of ambient air.
- * Air flows through hose to facepiece.
- * Air must be free of contaminants.
- * Must use a 5-minute escape bottle.
- * Serves as a long-duration work device and an escape device as well. The Hip-Air bottle is approved for respiratory protection for entry into, for extended periods of work in, and for escape from IDLH atmospheres. The self-contained air supply is approved for escape only.
- * When connected to a respirable air source, the device permits the wearer to work and move about freely, within the limits of the approved hose length.

Limitations:

- * Maximum hose length - 300 ft.
- * Maximum inlet pressure - 125 psig. Normal operating pressures should be between 60-80 psi.

BREATHING AIR REQUIREMENTS (ASTM GRADE D)

- * O₂ concentration is that concentration normally present in the atmosphere
- * Condensed hydrocarbons <5 mg/m³
- * Carbon monoxide <20 ppm
- * Carbon dioxide <1,000 ppm
- * No pronounced odor

HYDROSTATIC TESTING OF AIR CYLINDERS (SCBA & HIP-AIR)

- * Every 3 years for composite bottles
- * Every 5 years for steel bottles
- * Cylinder pressure - 2216 psig

INTEGRITY ENVIRONMENTAL SERVICES, INC

SAFETY GLASSES PROGRAM

Introduction

Personal protective equipment (PPE) such as hard hats, safety shoes, gloves, respirators and safety glasses provide a line of defense against injury. Obviously, it is preferable to eliminate hazards as the first line of defense, but in some instances, the company must insist that PPE be used when good safety practices require additional protection from environmental hazards.

Scope

The Occupational Safety and Health Administration (OSHA) requires the use of eye protection where there is a reasonable probability of preventable injury when such equipment is used. Employers must provide a type of protector suitable for work to be performed, and employees must use the protectors. These stipulations apply also to supervisors, management personnel, and visitors as well as to production workers. The OSHA standard that regulates eye protection is 29 CFR 1910.133.

Responsibility

Employees are required to have and wear safety glasses whenever they are performing their normal job functions or are working as a designated representative of the company.

Each Supervisor, will be responsible for monitoring employee compliance with the safety glasses program.

Discussion

A. Safety glasses must be worn whenever you are involved in your work normal activities identified in the following list:

- Grinding (secondary face shield protection also recommended)
- Sanding
- Drilling
- All welding and brazing operations (welding helmets required)
- Painting (spray or brush/roller)
- Using hammers
- When using compressed air
- When using impact air tools
- On the lathe
- Using the chop saw and saw-zall
- All torch cutting operations (shaded lens are required)
- When handling lead-acid batteries (secondary face shield also recommended)
 - When handling any open containers of chemicals
 - When cleaning parts with solvents
 - While involved in HazMat clean up activities
 - If you have had two or more eye injuries within the last 12 months

Effected working groups are as follows:

- Mechanics and all visitors to the shop
 - Project Managers
 - Haz Drivers
 - All Supervisors and Technicians
 - Outside staff
- B. On premises where the following hazards may exist: sparks, flying objects, chips, glare, liquids, flash burn, debris, dust, chemical gases, vapors, and fumes.
- C. In customer facilities that requires the use of safety eyewear.
- D. At **all** job sites.

Procedure

Department Supervisors will make sure all employees covered by this program are issued a pair of safety glasses.

A. Non-prescription

Integrity will issue, at no cost to you, one pair of safety glasses once every six months. Glasses will only be replaced if the old pair is turned back into your supervisor and he/she will be responsible for making the following decisions:

- If glasses are lost, destroyed or damaged through employee negligence, you will be charged via payroll deduction to replace them.
- If glasses are damaged or destroyed accidentally or through normal wear and tear, they will be replaced at no cost to the employee, but the old pair must still be turned to your supervisor

B. Prescription

Integrity will contribute to the cost of prescription safety glasses once every two years. If you use the company program, you will not have to pay any out of the pocket expenses for basic safety glasses (the cost of the eye exam is not covered by this program). The glasses that you purchase through the company program will include polycarbonate lens, clear spherical range from plano to + or - 3.00D power, frame, permanently mounted side/top shields and a case. (Full-face respirator spectacle kits will also be purchased through this program in addition to a pair of safety glasses once every two years, if your job requires.)

NOTE: Extras, such as additional scratch coating, UV coatings, specialty lenses and lens outside the power range of + or - 3.00D and frames not included in the company selection will be paid directly by the employee.

- 1) Obtain a Safety Rx Authorization Form, an Rx Order Form, a list of participating Dispenser/Opticians in your area and an instruction letter from Regulatory Affairs Department.
- 2) Make an appointment with your doctor/clinic.
- 3) Give the Safety Rx Authorization Form and Rx Order Form to doctor/clinic personnel the day of your examination.
 - a) At the doctor/clinic you will be given a selection of frames to choose from. Simply pick out a frame.
 - b) You will be contacted that your glasses have arrived. Please pick them up promptly and have them fitted by your doctor/clinic.

- 4) Tints/colored lenses are not allowed for prescription safety glasses, unless you are a Truck Driver (shaded), Operator (shaded), or a Mechanic (pink). (Welding safety eyewear is not included in prescription glasses.)
- 5) Side and/or top shields will be permanently attached to all frame styles

INTEGRITY ENVIRONMENTAL SERVICES, INC.

SEXUAL HARASSMENT POLICY

PURPOSE

Integrity Environmental Services, Inc. (Integrity) will not tolerate sexual harassment in its workplaces and will provide a work environment free of all sexual harassment. This policy is intended to fulfill those goals. More specifically, the purpose of this policy to maintain, protect, and safeguard the rights and opportunities of all people to seek, obtain and hold employment without experiencing sexual harassment or discrimination by any co-workers, supervisor or other person.

DEFINITION

Sexual harassment is defined as any of the following kinds of conduct:

- a) Making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature as a condition of an employee's employment, or
- b) Making submission to or rejections of such conduct the basis for employment decisions affecting the employee; or
- c) Creating an intimidating, hostile or offensive working environment by such conduct; or
- d) Threatening or insinuating that another employee's refusal to submit to sexual advances will adversely affect that employee's relationship with the company, work status evaluation, wages, advancement, assigned duties, or any other condition of employment; or
- e) Promising, implying or granting preferential treatment in connection with another employee engaging in sexual conduct; or
- f) Abusing the dignity or another employee through insulting or degrading sexual remarks or conduct.

Male or female employees or third parties having a business relationship with Integrity can cause sexual harassment. Sexual harassment does not include behavior or occasional compliments of a socially acceptable nature. Rather, sexual harassment involves behavior

that is not welcome, that is personally offensive, that fails to respect the rights of others, that lowers morale and that, therefore, interferes with work effectiveness. Sexual harassment can occur in several different ways, all-unacceptable:

- a) **Verbal:** Unwelcome sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, and/or threats.
- b) **Non-verbal:** Unwelcome sexually suggestive objects or pictures, graphic commentaries, suggestive or insulting sounds, leering, whistling, and/or obscene gestures.
- c) **Physical:** Unwelcome physical contact, including touching, pinching, brushing the body, coerced sexual intercourse, and/or assault.

Sexual harassment may be overt or subtle. Some behaviors, which are appropriate in a social setting, may not be appropriate in the workplace. Whatever form it takes, verbal, non-verbal or physical, sexual harassment is insulting and demeaning to the recipient.

POLICY

Sexual harassment is against the law and against Integrity's policies. Sexual harassment will not be tolerated at Integrity's workplaces and sexual harassers will be disciplined (up to and including dismissal) for acts of sexual harassment. As discussed more fully below, Integrity encourages reports of instances of sexual harassment, mandates that such reports be fully investigated and, if sexual harassment is determined to have occurred, requires that disciplinary action be taken against the offender. Further, no person making a good faith complaint of sexual harassment or participating or cooperating in good faith in an investigation of a sexual harassment complaint will be in any way penalized or punished as a consequence of making such a complaint or participating or cooperating in such an investigation, regardless of its outcome. Finally, this policy sets forth certain minimum preventative measures Integrity facilities must take to discourage and prevent sexual harassment.

COMPLAINT PROCEDURES

The following actions will be taken when an Integrity employee makes a complaint of sexual harassment:

1. Any employee who believes he/she has been the subject of sexual harassment by a fellow Integrity employee or by an employee of a third party with whom Integrity has a business relationship should report the alleged act immediately to his/her Department Manager or the Human Resources representative.
2. If a complaint involves the complaining employee's manager/supervisor, the complaint shall be filed directly with the Human Resources representative responsible for the employee's work location.
3. The Department manager/Human Resources manager responsible for the complaining employee's place of work is responsible in most cases for conducting the investigation of the complaint. Any Integrity manager receiving a complaint should immediately provide all information he/she has concerning the complaint to

that manager. The Department manager or Human Resources manager will conduct the investigation, or may delegate (when appropriate) the investigation to some other suitable person.

As soon as practicable after he or she receives the complaint (which, absent extraordinary circumstances, should be within 5 business days), the person responsible for conducting the investigation will communicate directly with the complaining employee in order to gather additional information regarding the complaint and to explain the investigative process to the employee. The investigation will be conducted in a confidential manner. In no case will information concerning a complaint be released by Integrity Environmental Services, Inc. to third parties or to anyone within the Company who is not involved with the investigation. The purpose of this provision is to protect the confidentiality of the employee who files a complaint, to encourage the reporting of any incidents of sexual harassment, and to protect the reputation of any employee wrongfully charged with sexual harassment.

4. Investigation of a complaint will normally include conferring with the parties involved and any named or apparent witness. Employees shall be guaranteed an impartial and fair hearing. All employees shall be protected from coercion, intimidation, retaliation, interference or discrimination for filing a complaint or assisting in an investigation, so long as they do so in good faith.
5. If the investigation reveals that the complaint is valid, prompt action will be taken, which may include disciplinary action designed to stop the harassment immediately and to prevent its recurrence.

Integrity recognizes that the question of whether a particular action or incident is a purely personal, social interaction without a discriminatory employment effect requires a determination based on all facts. Given the nature of this type of discrimination, Integrity also recognizes that false accusations of sexual harassment could have serious effects on innocent individuals. When Integrity determines that an employee has (1) made a charge of sexual harassment in bad faith (e.g., a false claim of sexual harassment) or has (2) acted in bad faith in his/her participation in the investigation of a sexual harassment complaint, Integrity will take disciplinary action for the employee's bad faith actions. However, Integrity will not take disciplinary action against employees whose complaints are made in good faith, but are not substantiated during the course of the investigation.

All employees of Integrity should continue to act responsibly to establish and maintain a pleasant working environment, free of discrimination, for all. Integrity encourages any employee to raise questions he/she may have regarding this Policy or its application with their Department manager or the Human Resources Department.

APPROVALS

Exceptions to this policy require the approval of Human Resources Manager or the Department manager.

PREVENTATIVE MEASURES

In Order to carry out this Policy, each Integrity workplace location must perform the following activities at a minimum.

- A. Each location must post the Integrity Environmental Services, Inc. Statement of Policy Against Sexual Harassment and this Policy in a conspicuous location that is visible by new applicants and current employees.
- B. All newly hired employees will receive training on this policy and how to report violations of the policy.
- C. All supervisory and management personnel will receive annual training on how to identify and prevent sexual harassment in the work place and how to handle a sexual harassment complaint.
- D. All employees should receive annual sensitivity training and information on the issue of sexual harassment and on the appropriate procedures for reporting any incident of perceived sexual harassment.
- E. Periodic reminders about Integrity Environmental Services, Inc. policy against sexual harassment should be distributed to all employees.
- F. Management at each location should periodically tour the facility for the purpose of detecting and removing any pictures, posters, calendars, graffiti, objects, books, magazines or other materials that are sexually suggestive, sexually demeaning or pornographic.

RESPONSIBILITIES

The Human Resources Department or Department managers are responsible for the implementation of Sections 1-5 of this Policy. The General Manager, Facility Manager, and/or Branch Manager will be responsible for complying with the requirements of Section 6 of this Policy for his or her location. Such managers are encouraged to consult with the appropriate Human Resources manager/Department manager as issues and/or questions regarding this Policy arise.

The Human Resources Department/Department manger will develop and make available a Sexual Harassment Awareness and Training Program for use on a local level.

The Human Resources Department is responsible for providing advice and assistance to management on the issue of sexual harassment.