ATTACHMENT 16

- FACILITY SECURITY PLAN

ENVIRONMENTAL MANAGEMENT, INC.

Security Plan

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COMPANY SECURITY STATEMENT

Environmental Management is committed to the safe and secure handling and transporting of hazardous materials, products, and wastes. Environmental Management will do everything possible to assure the safety and security of the company's personnel, facilities and equipment, the cargo we transport for our clients, and the general public with whom we come in contact. Environmental Management will attempt to deter theft of company property and equipment and the cargo transported on behalf of our clients.

SECURITY OBJECTIVES

The security objective of Environmental Management is to ensure the safety of our employees and the security and integrity of hazardous materials, products, and wastes.

SCOPE

Environmental Management's written Security Plan contains the following three basic areas:

- **Personnel security**
- **Unauthorized access**
- **En-route security**

PERSONNEL SECURITY

Pre-Employment and Current Employees

Pre-Employment

All applicants applying for any position with Environmental Management shall submit an accurate, complete, signed and dated application for employment.

Measures to verify information provided by applicants for employment includes the following;

1. Pre-Employment Background checks will be done consistently for all employees.
2. The extent of the Pre-Employment investigation will be keyed to the job for which applied.
3. The following list contains items which shall be verified on every job applicant;
    a. Verify Social Security Number
    b. Verify the type of military discharge, if applicable.
    c. Conduct criminal records check.
    d. Include photo of employee in personnel file.
    e. Conduct a pre-employment interview; appraise personality, character, motivation, honesty, integrity, and reliability.
    f. Verify all names and addresses used by the applicant.
    g. Request three personal references and contact each reference.

h. Check with schools listed on the application. A certified copy of transcripts may be necessary.
i. Verify that drivers are U.S. citizens or that non-citizens have documentation appropriate to their immigration status.

4. Each new employee shall sign a receipt for every issued item such as; keys, safety equipment, identification badges, etc.

Current Employees

The eyes and ears of our employees are one of our most important security systems. The following measures shall be utilized to increase security and awareness with all employees:

1. Report suspicious individuals, incidents or events.
2. All employees handling or transporting hazardous materials must have adequate communication devices to use in case of emergency.

Security Training

Environmental Management shall ensure that all employees are provided with thorough security training. All employees shall be trained in, and are expected to be familiar with, the company's security plans and procedures. In addition to training on the "specifics" of the Security Plan, general security awareness training shall be provided as part of a three-year recurrent training program. At a minimum, this training will include detailed instruction regarding our:

- Company security objectives
- Company security structure
- Specific security procedures
- Employee responsibilities
- Actions to take in event of an emergency/security breach

Responsibilities

Employer Responsibility Statement

Environmental Management shall provide a work environment that is reasonably free of hazards and threats of violence, which may cause damage to property or harm to people. It is also our policy to establish an effective and continuous Security Plan that incorporates educational and monitoring procedures. Environmental Management shall be responsible for ensuring that its employees are trained in appropriate security and suspicious activity reporting procedures.

Employee Responsibility Statement

All employees have a responsibility to themselves and to Environmental Management to observe and report any suspicious or unusual activity that threatens safety or security.

Security Manager

The Security Manager is responsible for establishing and communicating the overall Security Plans procedures and goals of Environmental Management. Management shall designate who is Security Manager for the company. The Security Manager duties are the responsibility of the Environmental Health & Safety Coordinator & Operations Manager.

Managers and Supervisors

Managers and Supervisors are responsible for being fully knowledgeable of the security issues and concerns of their area and employees. In addition, they are responsible for providing detailed information on system operations including daily work processes, activities, and identifying potential security vulnerabilities. Once identified, managers and supervisors are responsible for:

- Selecting, prioritizing, developing, and implementing strategies and procedures to meet established security goals.
- Measuring and monitoring the effectiveness of the security strategies and procedures.
- Reviewing and, when necessary, adjusting the strategies and procedures. If deficiencies or other vulnerabilities are discovered in the security process, appropriate corrective action or adjustments will be made.

Employees

Employees are responsible for conforming and adhering to all security-related work activities, processes, and procedures. In addition, employees are encouraged to provide feedback and suggestions on ways to improve the company's security program. Employees must also be familiar with their specific duties.

Suspicious Activity

Environmental Management defines suspicious activity to include (but not limited to) any of the following situations:

- Unidentified person(s) attempting to gain access to equipment in the terminal, such as tractors, trailers, and/or buildings.

- Unidentified person(s) in any area of the terminal, office, or other buildings.
- Any unescorted or unaccompanied visitor wondering around anywhere on the premises.
- An employee, visitor, vendor, or supplier visiting a part of the Terminal where they have no apparent business.
- An unidentified briefcase, bag, box, or other such container left unattended.
- Any vehicle driving by or around the terminal after hours.
- Any occupied vehicle parked outside the terminal - especially if the vehicle has been sitting for a long period of time, or after normal work hours.
- An unfamiliar vehicle, which appears to be abandoned, parked near the building or terminal.
- Any person or group loitering outside the terminal.
- Any person, who appears to be hiding something, appears nervous, or secretive (this includes employees).
- Any employee or visitor making unusual or repeated requests for sensitive company information to which they would not normally need to have access.
- Any person claiming to be a representative of a utility company, or attempting to work on or service some utility connection, but cannot produce proper identification or a proper work order from the appropriate utility company.

All employees are expected to understand and adhere to the following suspicious activity reporting procedures. They are intended for all employees to follow in the event any unusual or suspicious activity that poses a threat to the safety of our employees and the security of our equipment, facilities, or hazardous materials cargo is observed.

Breach of Security Reporting Procedures

Any employee observing what they believe to be suspicious activity or apparent criminal acts affecting the safety or security of Environmental Management must notify their supervisor, the Security Manager and/or any management person of the situation. **DON'T OVER-REACT AND DON'T PANIC!**

Employee/Management Meetings

A security component shall be included in every monthly safety meeting.

Managers and Supervisors are responsible for communicating all relevant company security-related information, news, facts, and trends to their employees in a timely and accurate manner.

UNAUTHORIZED ACCESS

Environmental Management has a zero tolerance for unauthorized access of its facilities, grounds, vehicles, and computers. All suspicious activity must be reported to a supervisor, the Security Manager, and/or any management person immediately.

FACILITY SECURITY

The entire facility of Environmental Management is fenced. Monitored security alarms, motion detectors, and video surveillance equipment are employed to ensure the safety of the employees, facility, and equipment. The following measures have been implemented to increase facility security. Facility security includes;

- Information related to our facility, employees, and the materials we handle is restricted to a need-to-know basis.
- All visitors must enter through the front door of the main office and sign in. All visitors will be assigned a visitor's badge (red or green) which readily identifies them to all employees. A red badge is assigned to a restricted visitor that must be accompanied by an employee at all times. A green badge will be issued to frequent visitors of Environmental Management (vendors, consultants, etc.). Visitor's badges shall be turned in upon signing out of the facility. Any visitor violating this procedure will be asked to leave.
- All vehicles containing hazardous materials must park in the designated parking areas.
- The Security Manager shall conduct spot checks of personnel and vehicles.
- The legitimacy of new vendors through listings in phone book or industry publications, websites or references must be confirmed.
- The Terminal Supervisor shall maintain an updated and accurate account of trailers containing hazardous materials on the terminal property, and check the status daily.
- The Security Manager will conduct regular inspections of storage areas.
- Keep all equipment, buildings and storage areas locked outside of business hours.
- All employees should be alert for unusual purchases.
- All employees must be alert to abnormal behavior and report suspicious activity.
- The Security Manager will monitor current federal, state, and local government alerts, advisories, and warnings regarding threats.

SPECIFIC SECURITY PROCEDURES

Pick-up/Delivery Security Procedures

The Terminal Manager or Terminal Supervisor shall assign all pick-up/delivery assignments involving the transportation of hazardous materials.

The Terminal Manager or the Terminal Supervisor shall be responsible for the security and proper issuance of all hazardous materials load-related work assignment documents. When providing load information to drivers, they shall review the load information to ensure that it is complete and accurate. For security purposes, it is extremely important that:

1. The load assignment is clearly communicated.

2. Trailer/Truck numbers are verified.

3. Shipping papers are checked and verified.

In the event a trailer containing hazardous material(s) needs to be dropped (for any length of time) in the terminal, all load-related paperwork shall be brought into the receiving office or shop office and maintained there. Drivers are prohibited from leaving load-related paperwork with any loaded trailer. Drivers failing to abide by this procedure are subject to disciplinary action.

Trailers containing hazardous materials that are dropped at the terminal must be dropped in a designated area and locked.

Prior to discarding old operational, compliance-related, and hazardous material records or documents, they shall be destroyed (shredded).

Security Inspections

Environmental Management is committed to providing its employees a safe and secure work environment. The company shall provide adequate security measures to ensure the safety of its employees, equipment, facilities, hazardous materials, and the general public. The following security guidelines cover safety and security issues related to external and internal security inspection procedures.

External Premises Security Inspections

Fences, Gates, and Exterior Doors

Facility maintenance personnel shall be responsible for the daily inspection of the fence and associated gate(s). All necessary repairs shall be performed as needed.

- The entire perimeter of the facility is fenced and the single entrance/exit gate is operated by coded openers and remains open during normal business hours. The gate will remain closed after hours except during emergency response operations.
- Internal fencing is six feet high, securely anchored, and topped with a barbed wire section angled outward at 45 degrees.
- An adequate clearing on our side of all fencing shall be maintained.
- Broken fences, gates, and doors shall be repaired immediately.
- Ladders and long objects shall not be stored in plain sight or by fences.

Any unusual or suspicious damage to fencing or gates must be reported to the Security Manager immediately.

Access to facilities, parking lots, and general premises are confined to one gate.

Facility maintenance personnel will be responsible for ensuring areas adjacent to both sides (inside and interior side of perimeter) of the fence are properly maintained and remain completely clear of trash, debris, and weeds.

Terminal Security Signs

Security/warning signs are posted at the entry point to the storage terminal. All signs are conspicuously posted, clearly readable, and easily understood.

The posted signs read as follows:

NOTICE
Restricted Area
Authorized Personnel Only

DANGER
Unauthorized Personnel
KEEP OUT

Terminal Check Inspection Procedures

Routine walk-around inspections shall be conducted at a rate of not less than twice daily (early morning and late afternoon).

Company vehicles shall be accounted for and any vehicle discovered during an exterior inspection that cannot be identified shall be physically checked, investigated, and identified.

Any unauthorized persons discovered during the course of any inspection shall be escorted to the office and reported to the Security Manager.

Loaded trailers containing hazardous materials cargo shall be locked during non-business hours.

Exterior Security Lighting

Facility exteriors, grounds, and parking lots shall be well lighted by automatic security lighting devices, which may include:

- Dusk-to-dawn mercury lighting;
- Motion sensing/detecting floodlights; and/or
- Automatic timer activated exterior lighting.

Exterior security lighting is sufficient to illuminate the entire building exterior and surrounding grounds, which permits easy detection of any unauthorized person, whether intruder or trespasser.

Facility maintenance personnel shall inspect the operation of exterior lighting at a rate of not less than once per month.

Doors, Windows, and Entryways

Exterior doors, windows, and other entryways shall be inspected and maintained according to the following procedures.

All exterior doors are secured with door bars and/or heavy duty locks. Heavy-duty dead-bolt type locks secure the office doors.

Issuance of exterior door keys shall be restricted to designated personnel. Issued keys will be recorded on the master key log, which will be constantly retained on file.

All exterior windows shall be secured with locking devices that can withstand efforts to pry or force the window open.

Hazardous Materials Storage Security

All hazardous materials are stored within the locked and secured area with limited and controlled access. Authorized employees only shall be allowed access to hazardous materials storage areas.

Monthly inventories of all hazardous materials on site shall be conducted. Any shortages or discrepancies discovered shall be investigated and/or reconciled immediately.

External Partnerships

Environmental Management has established partnerships and a professional working relationship with local law enforcement officials, emergency responders, and other public safety agencies. These partnerships include the sharing of information related to Environmental Management's operation, work processes, and hazardous materials stored on site or transported.

Local law enforcement officials, emergency responders, and other public safety agencies shall be periodically invited on site to discuss and evaluate potential security risks, vulnerabilities, and to assist in the development or enhancement of our current security program.

Visitors, Vendors, and Suppliers Security

Main Entrance Guidelines

All visitors to the facility must enter through the main entrance.

All general visitors and customers shall be required to register with the receptionist upon arriving. Under no circumstances should a visitor to Environmental Management be allowed access without first registering with the receptionist.

A visitors log shall be maintained for all general visitors to Environmental Management. The visitors log shall include:

- The name of the visitor and company he/she represents;
- The date and time of arrival;
- The employee they have come to see;
- The purpose for the visit; and
- The date and time of departure.

The visitors log shall be maintained for 6 months in the Reception office.

General Visitor Guidelines /On-Premise Procedures

After registering, and depending on the reason for the visit, the visitor shall be met in the reception area by the company employee who arranged the visit, and escorted to his or her office, workstation, or the appropriate area of the facility.

Once the work/visit has been completed, the visitor shall be escorted back to the reception area to sign out.

Employee Parking

Employees shall park only in areas specifically designated for employees. Unauthorized parking near or in a loading/unloading dock is strictly prohibited.

Loitering on Company Property

Environmental Management has adopted a no loitering policy. Loitering in company buildings/terminals and on company grounds by any person(s), including employees is prohibited.

Managers and supervisors are instructed to confront and question any person(s) observed loitering on company property. This applies to any unauthorized or unknown person(s).

Employees may congregate in designated areas only, e.g., break room, lunch room, smoking area.

INFORMATION SECURITY

All information (electronic and hard copy) relating to the storage and/or transporting of hazardous material shall be restricted to employees on a need-to-know basis. All hazardous material related paperwork and other documentation shall be maintained and retained in a secure area with limited and controlled access.

Environmental Management shall maintain an updated virus protection program and firewalls between our servers and the world.

EN-ROUTE SECURITY

En Route Security

The following measures address security risks of shipments of hazardous materials en-route from origin to destination, including shipments stored incidental to movement.

Company Assigned Equipment

Drivers are responsible for and are expected to use the padlocks on all trucks/trailers.

Point-of-Origin Driver Security Procedures

Upon arrival at the load's point of origin, all drivers shall check in with the responsible personnel to notify them of arrival. Drivers may also be expected to produce their current commercial driver's license (CDL) and their Environmental Management photo ID. While at the shipper, drivers shall follow the loading instructions and obey all customer safety and security rules and procedures.

At the designated loading location, the driver shall secure the vehicle. No Company vehicle will be left unattended until the driver is confident the vehicle is secured from moving.

Shipper Load & Count

In the event of a live load, drivers are expected to supervise the entire loading process. Drivers are responsible to make sure no unauthorized or unscheduled cargo is loaded onto their trailer.

When all loading activity has been completed, drivers are responsible for making sure the cargo is secure and checking the bill of lading or the delivery manifest to ensure the cargo count is accurate. Once drivers are satisfied that the cargo matches the shipping papers, they shall:

1. Close and lock the trailer.
2. Have the shipping papers signed by the responsible shipping personnel before leaving.

If a discrepancy is found between the cargo and bill of lading or shipping manifest, drivers shall contact the project manager immediately for instructions.

Before leaving any shipper, drivers shall make a thorough visual observation of their immediate surroundings and report any unusual or suspicious activity to the project manager immediately.

Pre-Trip and Dispatch

1. Drivers must perform an inspection of the vehicle and load prior to departure. This inspection shall include looking on top and around the vehicle for foreign objects. Look for anything attached to the vehicle that should not be there; i.e., a wrapped or taped package, a box of unknown origin, or any electronic device.
2. Attach locks to cargo doors.
3. Receive routing from Supervisor
4. Approved routes to frequent destinations should not be alternated unless a manager directs.

Loading and Unloading

Don't pre-load hazardous materials shipments without authorization from the Terminal Manager or the Terminal Supervisor.

Driving

1. If you believe you are being followed, call a Manager or Supervisor and/or 911 for help.
2. Be wary of any vehicle with two or more persons, which appears to be following you.
3. Be on the look out for two or more vehicles working together to trap you.
4. If it is apparent that hijackers are trying to force you to stop or leave the road, call 911 for help.
5. You must constantly be aware of the situations around you.

6. Don't discuss your cargo, destination, or trip specifics with people on the CB radio, in a restaurant or a service station.
7. Keep your doors locked at all times.
8. Keep a proper following distance to allow room for escape in an emergency.
9. When stopped at a traffic light or in traffic, be aware of anyone approaching your vehicle.
10. Minimize exposure to downtown or heavily populated areas and expedite the shipment to the final destination.
11. Avoid bridges and tunnels, if possible; if not practical, minimize time on bridge or in tunnel.
12. Do not stop to help a supposedly stranded motorist. Call the local law enforcement office and they may send help.
13. Don't allow unauthorized persons in your truck.
14. When you perform a Safety Check, conduct it at a safe place such as a truck stop or rest area with other drivers present.
15. Carry and maintain the cell phone to contact the terminal and emergency officials.
16. If you must use a public phone to discuss your load with appropriate parties, be extremely mindful of how loud you are talking and who might be listening.
17. Make a check-in call to the terminal at least two (2) times per work day.

Stops while En-Route

This can be one of the most dangerous times for a driver. The following policies shall be adhered to at all times:

1. Minimize stops en-route; if you must stop, select locations with adequate lighting on well-traveled roads.
2. Avoid entering rest areas where there are no other trucks.
3. If equipped, use your engine kill switch to prevent theft.
4. When you leave your truck, shut off the engine and lock the doors. Never leave your truck running with the keys in it. Be sure all the doors are locked, including sleeper berth access.
5. Be aware of the situation around you and anyone who may be approaching.
6. Watch for suspicious people who may be following you into the rest room.
7. When you return to your vehicle, check all locks for evidence of tampering.
8. Scan the vehicle for any items that may have been attached to it in your absence. If a package or device is found, don't attempt to remove it. Call 911 then call a Manager or Supervisor.

Communication Recommendations

1. The recommended form of communication is the company-provided cellular telephones.
2. The CB radio is a means of advising other drivers of a possible situation requiring assistance, but be aware that a prospective hijacker can also listen in on your

conversation and may reply as someone willing to help. Be careful. Verify to whom you are speaking.

Stop-Off/Destination Driver Security Procedures

Upon arrival at the destination or stop-off, drivers shall check in with the responsible receiving person(s) to notify them of arrival and receive unloading instructions. Drivers shall follow receiver's unloading instructions, and obey all customer plant safety and security rules and procedures.

Once permission to unload has been given, the driver shall proceed to the unloading location and secure the vehicle. No company vehicle shall be left unattended until the driver is satisfied that the vehicle is secure from moving and secure from unauthorized entry.

The driver, along with a responsible receiving employee, shall verify delivery, inspect the trailer, open and secure the trailer doors, and inspect the cargo.

Drivers shall supervise the unloading process. In the event of cargo damage, overage, shortage, or any other discrepancy, drivers shall contact the project manager immediately for instructions and to report the load discrepancy incident.

CONCLUSION

This Security Plan is intended to comply with HM232, but the overall purpose is to protect our employees, facilities and equipment. The success of any plan or procedure is dependent upon the willingness of the employees to properly implement and maintain it. For any questions regarding this Security Plan, see the Security Manager.

I acknowledge I have been informed, and given a copy of Environmental Management's Security Plan. I have read and understand the procedures contained therein, and I accept the plan as a working document that I will support and follow in my daily work.

Employee's Signature: _____

Date: _____

Supervisor's Signature: _____

Date: _____

Security Manager's Signature: _____

Date: _____

ATTACHMENT 17

- SPILL RESPONSE PLAN

ENVIRONMENTAL MANAGEMENT

SPILL RESPONSE PLAN

1.0 Emergency Telephone Numbers

National Response Center	800-424-8802
Chemtrec	800-424-9300
Environmental Management, Inc.	405-282-8510

2.0 Spill Response Procedures

① Notify supervisor immediately
② Use Contingency Plan drums
③ Following proper Contingency Plan procedures
④ Contain all material within a confined area
⑤ Set up a spill dike or dam
⑥ Secure the area
⑦ Use proper containers for storage and shipment of contaminated materials
⑧ Keep sparks or open flames from containment or spill area
⑨ Keep all incompatibles away
⑩ Notify local, state, and/or federal agencies as required

3.0 Stopping and Containing a Leak from a Vessel

① The vehicle will pull over and turn on emergency flashers.

② The manifest will be reviewed for the identification of the material(s) being transported. Emergency notification procedures will be complied with at the appropriate time.

③ The proper personnel protective equipment and safety procedures will be utilized for the hazardous material that has been released or worst-case hazard in the work zone.

④ The pump on the vacuum tanker will be started initiating a vacuum inside the vessel. This will assist in slowing or stopping the leak. **STOPPING THE RELEASE OF ANY HAZARDOUS MATERIALS IS OUR FIRST PRIORITY.**

⑤ If the leak is impossible to stop (i.e. broken weld or valve) then liquids will be diverted away from waterways, culverts, drains, etc. by making either ditched, swales, or berms to an existing low point, or trying to construct a catch basin. This will allow the material to pool and will minimize the area to be cleaned. Depending upon the size and location of the leak, a plug may also be used to assist in containing the hazardous material.

⑥ If the material appears to be headed into a storm drain, the cover will be removed and the pipes will be filled with adsorbents. This should stop the release out of the overflow pipes into the waterways.

⑦ If there is a leak into a waterway and the product is **lighter** than water, the material will float on the surface and absorbent booms can be used to divert the product to a collecting area. The material can then be skimmed off with a vacuum tanker and/or removed with absorbent pads.

⑧ If there is a leak into a waterway and the product is **heavier** than water, a dike will be made with existing material across the waterway which should contain the chemical. This will allow the water to flow over the dike leaving the hazardous material behind.

4.0 Clean-up Procedure Following the Containment of a Vessel Leak

① The area will be posted with warning signs and caution tape to establish a working zone. Only trained and authorized personnel are allowed in the controlled area.

② The proper personal protection equipment and safety procedures will be utilized for the released hazardous material or worst-case hazards on site.

③ Communications and emergency evacuation procedures will be established by a site supervisor.

④ Remediation of the site will begin under the direction of the site supervisor. Compatible clean-up supplies and equipment (e.g., speed-dry, absorbent pads, containment booms, etc.) will be used during abatement operations. All contaminated cleaning supplies will be collected and placed in an established storage area inside the work zone.

5.0 Stopping and Containing a Leaking Drum

① The vehicle will pull over and turn on emergency flashers.

② The manifest will be reviewed for the identification of the material(s) being transported. Emergency notification procedures will be complied with at the appropriate time.

③ The proper personnel protective equipment will be utilized for the hazardous material that has been released or the worst-case hazard in the work zone.

④ The leak will be contained using drum plugs and/or sealants. Absorbent pillows and speed-dry will be placed in the surrounding area.

⑤ The damaged drum will then be placed into a recovery drum.

⑥ The recovery drum will then be secured and labeled.

6.0 Personnel and Equipment Decontamination Procedures

① Personnel and protective clothing will be subject to decontamination procedures using water (or appropriate solvent) in the area immediately outside of the work zone.

② The decontamination zone will consist of a plastic-lined open drum for disposal of suits, gloves and other expendable items. Two (2) wash tubs will also be located in this area for decontamination of reusable clothing items (e.g., rubber boots, respirators, etc.).

③ Equipment and vehicle decontamination will be performed on site in a designated area at the completion of abatement operations.

④ Decontamination wash and rinse water will be collected in D.O.T. approved containers and placed in an established storage area inside the work zone.

ATTACHMENT 18

- EMERGENCY ACTION PLAN / SITE CONTINGENCY PLAN

Environmental
MANAGEMENT

CONTINGENCY AND EMERGENCY ACTION PLAN

IN THE EVENT OF AN EMERGENCY
REFER TO SECTION 2.4

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PART ONE

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1.1 Explanation of Purpose

The purpose of the Site Specific Contingency Plan is to minimize any hazard to human health or the environment in the event of an actual or eminent emergency situation involving fire, explosion, or a sudden/non-sudden hazardous materials products release to the air, soil, or water. Through a complete understanding of the plan and its objectives, the health of all individuals and their environment can be protected in an emergency situation.

The Contingency Plan outlines procedures to be followed in order to implement the plan in the event of an emergency that would require the use of the plan. Included in the procedures are the facility evacuation and emergency shutdown instructions, a list of emergency equipment available at the facility, procedures for obtaining assistance from other agencies, and reporting procedures to local, state and federal entities.

A **Table of Contents** has been provided for quick reference at the beginning of each Section and the distribution list denotes the location of all copies of the Contingency Plan manual.

1.2 Company Capabilities

Environmental Management Inc. (Environmental Management) is a comprehensive environmental management company and has a fully staffed Hazardous Materials Emergency Response Service. Environmental Management offers a complete line of services performed by highly trained and specialized professionals. The following services are available to our clients:

Auditing and Consulting

- Property Assessments
- Permitting and Monitoring

Training (specifically regarding the following regulations)

- EPA Title 40, Parts 264 and 265, and RCRA Training Requirements
- OSHA Title 29, Part 1910.120 Hazardous Materials Operations and Emergency Response
- OSHA Title 29, Part 1910.1200 Hazardous Communications Standard Requirements
- HM181 Title 49 CFR, Subpart C Hazardous Materials Transportation Uniform Safety Act Training Requirements (including HM126-F)

Emergency Response

- Incident and Site Assessment
- Remediation and Closure
- Oil Field Abatement

Specialized Services

- Explosive Handling
- Specialized Lab Packing
- Transportation and Disposal of Hazardous Materials
- Underground Storage Tank Monitoring and Removal

Environmental Management is an approved Environmental Protection Agency contractor providing 24-Hour emergency service and serves as a hazardous materials information center for fire departments, governmental agencies and private industry.

1.3 Terminal Facility Site Map

The Map on the following page illustrates the location of Environmental Management's facility in relation to Oklahoma City and Guthrie, Oklahoma. The facility is located 2.5 miles east/northeast of I-35 Exit 157 on Highway 33, and is easily recognized as being a set of blue metal buildings fronted with a white three-rail PVC fence. As you approach the facility a United States flag will be seen located near the main office building.

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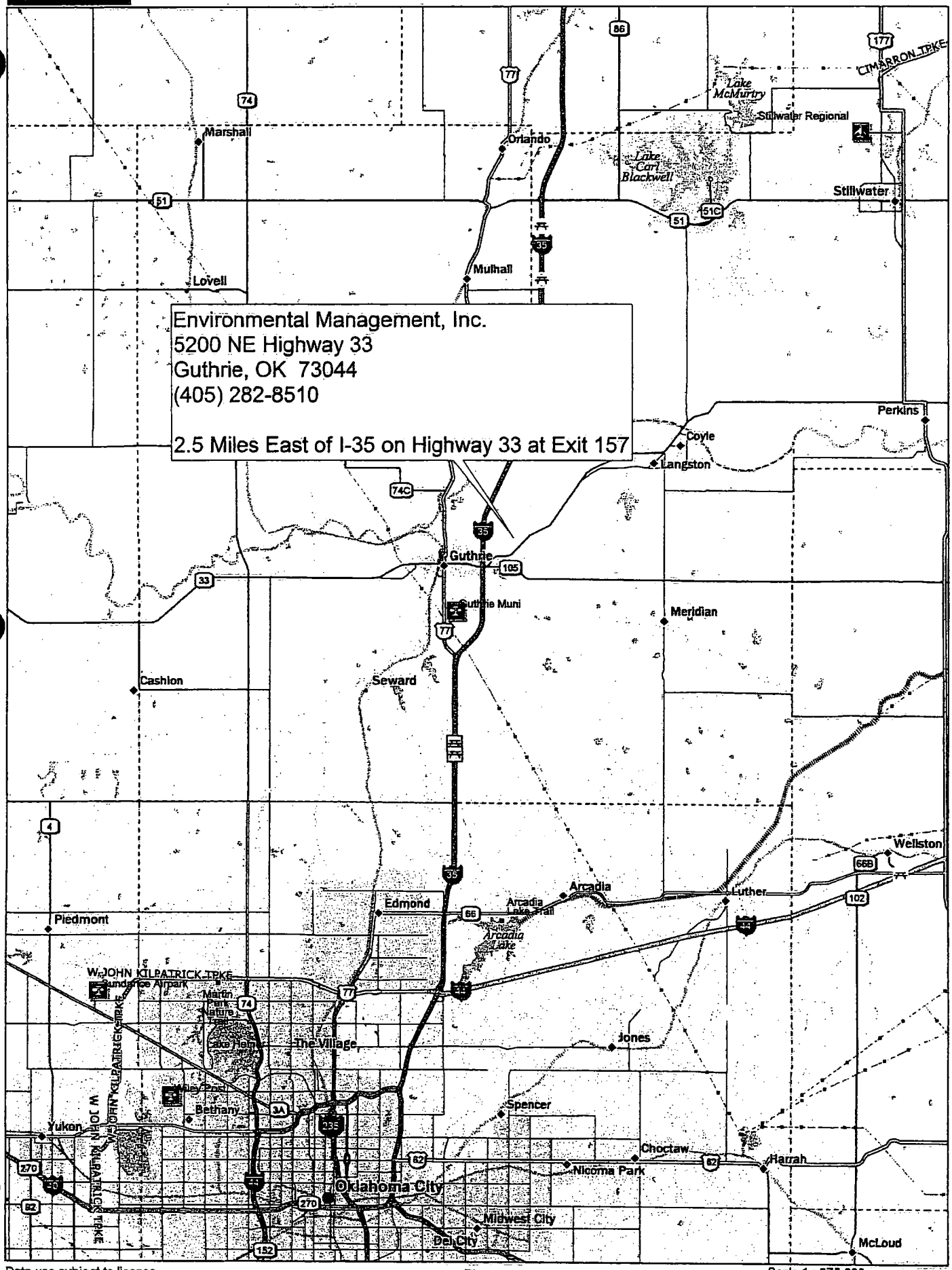

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Scale 1 : 375,000

1" = 5.92 mi

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PART TWO

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2.1 *Emergency Response Plan*

This plan will serve as a general guide for the Response Coordinator and his/her personnel in the event of an emergency incident requiring an emergency response. The response coordinator shall determine the proper procedure or action necessary to control the emergency contingent upon site conditions and the particular circumstances involved.

2.1.1 Environmental Management Response Team

The Environmental Management response team is a well-trained coalition of technically oriented personnel able to provide safe cleanup and removal of spilled hazardous materials. The necessary personnel and equipment are on standby 24-hours a day. The team will be able to mobilize and be enroute to the scene of a spill or emergency response incident within a matter of minutes via the most appropriate means of transportation available. A second response team shall be on standby if needed. A Response Coordinator will manage the coordination of personnel and equipment. This person shall have a large degree of chemical knowledge and experience in the proper handling of hazardous materials. The team shall consist of personnel who are trained and certified and have the technical capability and experience required to complete their duties.

2.1.2 Equipment

Environmental Management has a complete line of emergency response equipment. Trucks are available and sized from pickup trucks to large-scale tractor-trailer rigs. Other large-scale equipment required for emergency response and hazardous materials handling are also available. A complete list of the equipment available can be found in Part 4 of this document beginning on page 30.

2.1.3 Commitment of Resources

Environmental Management shall commit all available resources and equipment, in the event of an emergency, to ensure the safety of human health and protection of the environment. Resources shall be available in all situations where there is a threat or eminent emergency involving fire, explosion, or a sudden/non-sudden hazardous materials product release to the air, soil or water. It shall be understood that these resources will be available for activation by Environmental Management or any Coordinating Agency (or their designee), whether the emergency exists at the Environmental Management facility or at another location where Environmental Management resources are utilized as additional aid.

2.2 *Environmental Management Emergency Coordinators*

2.2.1 Emergency Coordinator Qualifications

Persons authorized to serve as Coordinators in the event of an emergency at the Environmental Management facility shall meet the minimum qualifications as follows:

1. Must be available at the terminal facility or be able to reach the terminal in a short period of time.

2. Must be familiar with all aspects of the Contingency Plan and its implementation.

3. Must be familiar with all terminal operations and activities.

4. Must know the locations and characteristics of all waste handled at the terminal.

5. Must be familiar with the terminal layout and emergency cutoff locations.

6. Must have the authority to commence emergency resources outlined in the Contingency Plan.

There will be a minimum of one employee at the facility or on-call (available by mobile phone, etc.) at all times who will assume responsibility for coordination of response measures in the event of an emergency. The Emergency Coordinator (EC) will utilize all available company and government assets necessary to protect human health and the environment from the threat of fire, explosion or releases of hazardous waste or hazardous waste constituents to the environment, as well as minimize the spread of contamination and the destruction of property.

The EC shall have complete authority to commit all available resources necessary to implement the Environmental Management Contingency Plan in the event of an emergency. All government authorities (e.g. fire departments, police departments, etc.) will coordinate their activities through the EC. The list of EC's is contained in the Contingency Plan and, in addition, this list shall be posted at numerous locations throughout Environmental Management's facility.

The EC will ensure that all incompatible materials are kept away from areas affected by emergency situations. The EC will immediately, after an emergency situation has been secured, provide for the treatment, storage and/or disposal of the recovered waste, contaminated soil, surface water or any other materials that resulted from the release, fire or explosion at the facility.

2.2.2 Authorized Emergency Coordinators and Emergency Numbers

24-HOUR RESPONSE NUMBER 405-282-8510

THE FIRST CALL MUST BE MADE TO 405-282-8510.
The on-call responder will initiate an emergency response.

The **24-hour Response Number** for everyone listed below is **405-282-8510.**

Terry D. Bobo	Mobile	(405)	623-5400
	Home	N/A	
Damon Yost	Mobile	(405)	623-5432
	Home	(405)	649-2524
Rick McDowell	Mobile	(405)	623-5444
	Home	(405)	260-0548
Tirso Beltran	Mobile	(405)	623-5434
	Home	(405)	360-0825
Preston Bobo	Mobile	(405)	623-5449
	Home	(405)	466-5667
Keeton Hill	Mobile	(405)	623-5433
	Home	(405)	509-0864
Misha Gonzales	Mobile	(405)	623-5445
	Home	N/A	
Matt Girard	Mobile	(405)	623-5448
	Home	N/A	
David Hooper	Mobile	(405)	757-8300
	Home	N/A	
Scott Kettman	Mobile	(405)	623-5439
	Home	N/A	
Dennis Melton	Mobile	(405)	623-5407
	Home	N/A	

Outside Agency Emergency Numbers

Guthrie Fire Department		**911**	Poison Control Center	(800) 764-7661
Ambulance		**911**	CHEMTREC	(800) 424-9300
Logan County OEM	(405)	282-0494	National Response Ctr.	(800) 424-8802
Logan County Sheriff	(405)	282-4100	ODEQ	(800) 522-0206
Logan Co. DEQ Office	(405)	282-6405		
Oklahoma Highway Patrol	(405)	682-4343		

2.3 Emergency Coordinator Statement

It is extremely vital that operations during an emergency be handled from a central location and that a competent Emergency Coordinator be available at all times to assure overall control of those operations pertaining to the Contingency Plan provided by Environmental Management. Each Emergency Coordinator is appointed by top management for the purpose of being responsible to coordinate company action during both the emergency and the restoration periods.

"I have read the Environmental Management Contingency Plan and fully understand my obligations to fulfill every responsibility mentioned in the plan. I pledge to cooperate with the local, state and federal emergency agencies and provide any information that would deem helpful."

Signed and witnessed this 19TH (Day) day of APRIL (Month), 2013 (Year)

Emergency Coordinator	Witness
Damon L. Yost (Printed Name)	JAMIE NEWTON (Printed Name)
Damon L Yost (Signature)	Jamie Newton (Signature)

2.4 Implementation

The provisions of the Environmental Management Contingency Plan are to be carried out whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment. This plan shall serve as a guide rather than an unyielding set of procedures. **Detailed Action Plans are located in Section 2.6 on page 18** and a **Contingency Plan Procedures Outline / Checklist is provided in Section 2.5.6 on page 15** of this document.

The Environmental Management Employee discovering the incident (e.g. explosion, fire, release of contaminants or personal injury) should, if possible, and absolutely safe to do so:

1. Evacuate injured personnel.
2. Stop the spread of contamination (e.g. turn off a valve on a tank).
3. Begin primary containment of liquids (e.g. dikes, etc.).
4. Evacuate unnecessary personnel from the immediate area of the incident.
5. Notify the Emergency Coordinator.

NOTE: The employee **should not** delay in notifying the Emergency Coordinator regardless of the situation.

2.4.1 IDLH (Immediately Dangerous to Life and Health) Policy

It is the policy of Environmental Management that human life takes priority over all other concerns. Level A and Level B Personal Protective Equipment are located within the Environmental Management facility for emergency use. In an emergency IDLH situation, evacuation of the facility and/or surrounding areas will take priority over the immediate incident until properly equipped and trained Environmental Management personnel arrive at the site. Fire beyond the incipient stage will be fought by ONLY trained fire fighting personnel. Major releases of materials that would pose an IDLH situation should be contained to the extent that NO person is placed in jeopardy. Once trained and equipped Environmental Management personnel arrive at the incident further measures will be taken if applicable. **The buddy system will be implemented in ALL situations.**

The emergency coordinator should consult the Emergency Response Guidebook for suggestions and outlines on handling materials, their potential hazards, spill or leak procedures and first aid.

2.5 *Emergency Response Procedures*

2.5.1 Identification of Materials

During any emergency situation, the Emergency Coordinator will identify the character, exact source, amount, and extent of any released material. This will be accomplished through observation (i.e. placards, labels), review of records, review of tank labels and/or review of the Hazardous Materials Manual. The Environmental Management Terminal Safety Plan, Contingency Plan, Hazardous Materials Handbook, etc. are located in the file room of the main office building. These books should be consulted by the Emergency Coordinator and replaced when no longer needed.

2.5.2 Assessment

The Emergency Coordinator will assess the possible hazard(s) to human health or environment that may be a direct or indirect result of the emergency situation. They will determine if a threat exists and the extent of any such threat. The Emergency Coordinator will consider the following during the assessment:

1. Types and effects of any toxic, irritating or asphyxiating materials that may be generated. Included should be the physical form (vapor, liquid or gas), volume or quantity of the material released, and the potential for further releases, as well as determining if the release will exceed Permissible Exposure limits.

2. The effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions.

3. The possibility of heat induced explosions.

4. The possibility of fire spreading to other areas.

5. The risk facility personnel might be exposed to by attempting to control an emergency situation.

In assessing potential hazards, the EC may take account of truck placards, manifests, operating records, weather conditions and container labels. If the EC determines that the station has had a release, fire, or explosion that could threaten human health or the environment outside the facility, he/she will immediately notify local authorities. **Outside Agency Emergency Numbers are located in Section 2.2.2 on Page 8 of this document**. The EC will also assist local authorities in determining if evacuation of the local area is necessary and, subsequently, notify the appropriate local, state and federal agencies designated as contact for that geographical location. If the release involves a material in excess of the reportable quantity the EC should also notify the National Response Center at **1-800-424-8802.**

2.5.3 Control Procedures

Upon determination that an actual or imminent emergency condition exists (i.e. threat to human health or the environment), the Emergency Coordinator will:

1. Coordinate the evacuation of personnel from the area of immediate danger and coordinate first aid for injured personnel if necessary. If it is determined by the EC that personnel must be evacuated from the entire facility, procedures for **Employee Notification are listed in Section 2.5.4 on page 13 of this document**.

2. Commence remedial actions that will reduce the impact of the incident and result in abatement of any further threat to human health or the environment. This would include measures, for NON-IDLH materials, to control the flow of liquids by constructing dikes, berms or holding pools or controlling the source of the release; or if gaseous, dispersing vapors by mechanical ventilation.

3. Large scale incidents will be managed and maintained to prevent run-off of fire fighting water and/or released materials to the greatest extent possible. Vacuum trucks will be used to remove free liquids and absorbant materials will be used to remove remaining contamination. If required, excavation of contaminated soils, gravel, etc. will be completed. All materials generated during remediation will be placed in containers designed to contain those materials (i.e. roll-off boxes, drums, etc.). All generated materials will be managed or disposed of in accordance with local, state and federal guidelines at approved facilities.

4. Decontamination of vehicles, equipment, PPE, etc. should be completed at the site in order to prevent further contamination to the environment. Cleaning of items using compatible solvents or cleaning compounds and reclamation of the generated materials should be performed to the extent possible at the facility.

NOTE: Depending upon the type of incident, different degrees of response may be warranted. Emergency Coordinators should be aware to use the degree of response most applicable to the situation. **A Contingency Plan Outline/Checklist is available under Section 2.5.6 on page 15 of this document**. The EC may also consider options that facility personnel suggest.

2.5.4 Employee Notification

After the Emergency Coordinator has determined that there is an actual or imminent emergency situation, the EC must:

1. Activate the internal facility alarms and/or communication systems (loud speakers, telephone, radios, etc.) as necessary to notify facility personnel. The alarm system can be activated by pressing **# and 3** simultaneously on the alarm keypad.

2. In the event that evacuation of the facility is necessary, and time permitting, the EC will have an emergency message announced over the intercom system similar to:

   "EMERGENCY EVACUATION REQUIRED - ALL employees please proceed to Emergency Assembly Areas."

   Evacuation procedures are further detailed in Part Three of the Contingency Plan. Emergency operations will typically be coordinated from the main office. In the event that this office is not available as a coordination center, another command post will be chosen by the EC. Communication via citizen band radios, business band radios, facility telephone, cellular telephone, or the facility public address system may be utilized during the emergency.

3. Notify the appropriate state or local authorities and agencies if their assistance is needed during the emergency. The procedures for notification of these agencies are listed in **Section 2.5.5, page 14 of this document.**

2.5.5 Reporting an Incident to outside authorities

The person making a report of a release, fire, explosion or other emergency situation MUST provide the following information to the authorities being notified: **Emergency numbers for outside agencies are provided in Section 2.2.2 on page 8 of this document.**

1. Name of the caller

2. Name of the facility and telephone number

   ENVIRONMENTAL MANAGEMENT, INC.
   (405) 282-8510

3. Location of the facility

   5200 NE Highway 33

   From the intersection of I-35 and Highway 33 at Exit 157 travel 2.5 miles East on Highway 33. The Environmental Management facility will set on the North side of the highway and will be recognized as a set of blue metal buildings and a white PVC three-rail fence leading to a metal entrance gate. A United States Flag will be located near the main office building.

4. Time and type of incident

5. Name and quantity of material(s) involved (if known)

6. Extent and types of injuries (if known)

7. Possible hazards to health and environment outside the facility

Should the option be implemented?	**Employee Discovering the Emergency**
☐ Yes ☐ No	1. Are there any injured personnel? If NO skip to Option 9.
☐ Yes ☐ No	2. Evacuate injured personnel from immediate danger.
☐ Yes ☐ No	3. Use SCBA to evacuate injured personnel from danger if necessary.
☐ Yes ☐ No	4. Start CPR or artificial respiration
☐ Yes ☐ No	5. Request that an ambulance(s) be dispatched to the facility and assign someone to meet and direct incoming emergency vehicles. Time: _____ Ambulance Service(s) contacted: _____
☐ Yes ☐ No	6. Wash eyes, skin, etc. of injured person with water for 15 minutes or until medical assistance arrives.
☐ Yes ☐ No	7. Using first-aid kit, treat injured personnel.
☐ Yes ☐ No	8. Evacuate the immediate area around the injured person(s).
☐ Yes ☐ No	9. Contact the Operations Manager if he is present, if not contact an Emergency Coordinator listed in Section 2.2.2 page 8. **Immediately turn over emergency operations to the Emergency Coordinator.** If outside agencies have been notified, the Operations Manager, Compliance/Safety Officer or an Emergency Coordinator should be notified. Person Notified _____ Date _____ Time _____
☐ Yes ☐ No	10. Fight fire with an extinguisher if applicable. Prohibit fighting the fire with water if solvents, oil, etc. are involved or suspected or if undesirable reactions may result (i.e. contaminated run-off that cannot be contained etc.)
☐ Yes ☐ No	11. If containment efforts are not effective, **Evacuate the immediate area around the emergency.**

Emergency Coordinator

☐ Yes ☐ No 12. Upon arrival the Emergency Coordinator should assess the emergency.

☐ Yes ☐ No 13. Evacuate of the facility.

☐ Yes ☐ No 14. Establish an emergency operations center.

If the facility is evacuated, consider locating the emergency operations center in a vehicle parked on a local road or highway. Establish communications using band radios or cellular phones.

☐ Yes ☐ No 15. Contact appropriate state and local agencies. (fire department, sheriff, OEM, hospital, etc).

If the Emergency Coordinator determines that the incident could threaten human health or the environment outside the facility, they must:

☐ Yes ☐ No 15a Notify the Sheriff and/or Oklahoma Highway Patrol if local areas need to be evacuated. **911**

☐ Yes ☐ No 15b Notify the Oklahoma Department of Environmental Quality. **1-800-522-0206**

☐ Yes ☐ No 15c Notify the National Response Center and provide information concerning the release. **1-800-424-8802**

☐ Yes ☐ No Advise the Highway Patrol or Sheriff's Department to establish roadblocks on Highway 33 as necessary to prevent further threats to human health.

☐ Yes ☐ No 16. List ALL agencies contacted, the approximate time contacted, and the name of the person contacted.

Agency Contacted	Time	Name of Contact

The Guthrie Fire Department will coordinate all other fire departments. The Oklahoma Highway Patrol will coordinate all law enforcement agencies.

☐ Yes ☐ No 17. Dispatch facility personnel to meet and direct incoming emergency vehicles

☐ Yes ☐ No 18. Commence remedial actions to stop the flow or release of materials (e.g. pump material to tanks, build containment dikes, etc.)

☐ Yes ☐ No 19. In affected areas of the facility, isolate (if possible) materials that may be in compatible with the released materials. Do not move materials to areas where they would be incompatible with existing operations.

☐ Yes ☐ No 20. Provide adequate safety equipment and protective clothing for personnel involved in remedial actions.

☐ Yes ☐ No 21. Utilize on-site equipment (if possible) for remedial actions.

☐ Yes ☐ No 22. Utilize outside contractors for remedial actions.

☐ Yes ☐ No 23. Provide for the treatment, storage or disposal of recovered waste, contaminated soil, surface water or any other material that results from a release, fire, or explosion at the facility.

Store and dispose of all materials in accordance with all applicable local, state and federal regulations.

Additional Options for the rupture of, or spill from, a container

☐ Yes ☐ No 24. Immediately cease the flow or stop the addition of waste into the container.

☐ Yes ☐ No 25. Immediately stop the release of material and control surface migration (e.g. pump material to containers, build containment areas, etc.).

☐ Yes ☐ No 26. Immediately transfer contents of container to another container.

☐ Yes ☐ No 27. Remove all waste from secondary containment systems in as timely a manner as possible to prevent harm to human health and the environment.

☐ Yes ☐ No 28. Visually inspect the area for release to soil or surface water and remove all contaminated material for disposal.

☐ Yes ☐ No 29. Determine that all released material has been remediated through instrumental or analytical inspections.

Options to prevent recurrence or spread of Fire/Explosions/Releases

☐ Yes ☐ No 30. Protect other operations and vehicles from the incident. These measures must include where applicable, stopping processes and operations, collecting and containing released materials, removing or isolating containers or moving vehicles.

☐ Yes ☐ No 31. Monitor for leaks, pressure build-up, gas generation or ruptures in other equipment.

☐ Yes ☐ No 32. Spray water on containers to keep them cool and to minimize the potential for explosions.

☐ Yes ☐ No 33. Remove combustible and/or flammable materials from the area.

☐ Yes ☐ No 34. Disconnect electrical power and natural gas from affected areas.

☐ Yes ☐ No 35. Circumvent receiving inflow (if applicable).

☐ Yes ☐ No 36. Cease all associated operations (if possible).

☐ Yes ☐ No 37. Prevent trucks from entering the facility with additional waste.

☐ Yes ☐ No 38. Halt all facility operations

2.6 Detailed Action Plans

2.6.1 Fire/Explosion

Should a fire or explosion occur at the terminal during operating hours, the following procedures should be considered:

1. Sound the alarm
2. Begin evacuation procedures
3. Contact the fire department - 911
4. Contact the ambulance service - 911

These procedures will assure that site workers know there is a problem on-site and should leave the area. Also, it will assure that available emergency assistance agencies needed to help control the incident have been notified and can begin response to the site.

The highest priority in any emergency is the safety of human life. With this in mind, the next steps taken should include:

1. Determine the need for first aid or basic life support for injured workers/observers;
2. Determine who can provide immediate medical assistance;
3. Determine the need for rescue;
4. Are qualified personnel available for immediate rescue;
5. What equipment is needed for the rescue and what methods will be employed;
6. Determine if public evacuation procedures are necessary.

After making determinations of the above, the following items should be given consideration:

1. Is law enforcement needed for site security or to control traffic;
2. If there is a small incipient fire, can site personnel control it with available equipment;
3. Is there potential for the fire to spread;
4. Is an explosion possible;
5. Do all personnel need to evacuate to a greater distance from the site;
6. Should the fire be allowed to burn until the fire department arrives;
7. Is there a need to contact additional help

The Emergency Coordinator (EC) needs to closely monitor workers involved in emergency operations and issue appropriate orders. When time allows, notify the proper authorities of the situation. Coordinate emergency activities with the fire department incident commander. Evacuation of the public is best left to the fire or police departments.

2.6.2 Accidental Release of a Hazardous Substance

A release of a hazardous substance could be a small incident requiring several minutes to control, or a major incident that requires activation of the Emergency Action / Contingency Plan, evacuation of site personnel and the public, use of heavy equipment and requires more manpower than is available on-site. The EC must determine what procedures are necessary according to the circumstances of the release.

Among the first questions to be asked are:

1. What substance(s) have been released;
2. What is their physical form (vapor, liquid, etc.);
3. How much of the material has been released and what is the potential for further release.

After answering these questions, the EC must determine the appropriate procedures which may include any or all of the following:

1. Implement the emergency response contingency plan;
2. Is evacuation needed;
3. Which outside agencies need to be notified;
4. How can the release be controlled;
5. Is personal protective equipment available to protect emergency workers.

Factors that need to be considered include:

1. Is the released substance toxic, flammable, corrosive or otherwise hazardous;
2. Will the type and amount of released substances exceed Permissible Exposure Limits;
3. What routes of dispersion can be anticipated.

In the event that the EC cannot determine adequate answers to these questions, a worst case scenario should be anticipated and the following procedures implemented:

1. Sound the alarm;
2. Begin evacuation procedures;
3. Contact the fire department, ambulance and law enforcement;
4. If safe to do so, begin measures to control the release by constructing dikes, berms, holding pools, etc.;
5. If safe to do so, try to control the release at the source;
6. If the release is gaseous, disperse the vapors with mechanical ventilation;
7. Make necessary notifications
8. Coordinate emergency activities with the fire department incident commander.

2.6.3 Personal Injury or Illness of Site Personnel

In the event of injury or illness to site personnel, operations should be ceased immediately. If rescue is needed, determine the possibility of using on-site personnel versus a response by outside agencies. Contact the ambulance service and the hospital and provide information as available concerning the nature of the injury or illness. In a Class A or B, Confined Space Entry, personnel will have lifelines attached for rescue purposes.

If the injury or illness is chemical related try to determine which chemical(s) are involved, and pass this information to medical personnel. If the injury or illness is life threatening, decontamination may be omitted or condensed. If the injury or illness is not life threatening, use normal decontamination procedures.

Make the necessary notifications and have the Safety/Compliance Officer inspect and clear the work area before operations continue.

2.6.4 Adverse Weather Conditions

If conditions are favorable for thunderstorms or tornadoes, supervisors, operations manager and other personnel will monitor local weather reports. Upon confirmation of adverse weather conditions that will affect the safety of site personnel, the following procedures will be implemented:

1. Sound alarm;
2. Begin evacuation procedures;
3. Announce over the intercom system that personnel should take shelter;
4. Direct site personnel to appropriate shelter areas.

As with any other emergency situation requiring an evacuation, the emergency coordinator is responsible for determining that all employees are present by conducting a head-count. If an employee is not present, the location of that employee must be determined.

2.7 Restart of Operations

In the event operations are halted as a result of the emergency situation, all emergency equipment listed in the plan is to be cleaned and made ready for its intended usage. All equipment should be returned to the proper storage locations prior to operations being resumed. A post-emergency checklist is provided on the following page that details items that should be addressed before commencement of operations. The Operations Manager must notify the EPA Regional Administrator and any appropriate state and local authorities that the facility is in compliance with applicable regulations before operations commence

The Operations Manager must also note the time, date and details of any incident requiring the implementation of the Contingency Plan within fifteen (15) days of the incident and submit a written report to the EPA Regional Administrator and the Oklahoma Department of Environmental Quality (Hazardous Waste Division) which contains the following information:

- Name, address and phone number of the Operations Manager
- Name, address and phone of the Terminal Facility
- Date, time and incident (i.e. fire, explosion, hazardous materials release, etc.)
- Name and quantity of all materials involved and the extent of any injuries.
- Assessment of actual or potential dangers which are considered hazardous or potentially hazardous to human health or to the environment.
- Estimated quantity and disposition of recovered material(s) resulting from the emergency situation and the associated remedial actions.

Minor incidents that are controlled by facility personnel and **do not** exceed the reportable quantity for any material do not necessarily require formal reporting to authorities. However, all spills which involve the release of amounts greater than the reportable quantity for any material (RQ), that is not completely contained within a secondary containment area, must be reported as per the regulations (40 CFR 302) to the National Response Center and the ODEQ, even if they do not result in implementation of the Contingency Plan. Whenever the Contingency plan is implemented, the ODEQ will be verbally notified as soon as possible. A sample of the information to be contained in the Contingency Plan Implementation report is included on Page 23 of this document.

Post Emergency Checklist

☐ Yes ☐ No 1. Fire protection equipment restored or replaced

☐ Yes ☐ No 2. Water supply units and utilities restored, checked and operating properly.

☐ Yes ☐ No 3. Damaged electrical equipment repaired and operating properly.

☐ Yes ☐ No 4. Debris removed.

☐ Yes ☐ No 5. Site operations stabilized and made safe for entry.

☐ Yes ☐ No 6. Equipment decontaminated and monitored for levels of hazardous substances above permissible exposure limits and determined safe.

☐ Yes ☐ No 7. Site personnel briefed on the emergency and any conditions that may have changed, including changes in the Contingency Plan.

☐ Yes ☐ No 8. Released hazardous and non-hazardous materials have been contained or removed.

☐ Yes ☐ No 9. Emergency medical equipment restored and/or replaced.

☐ Yes ☐ No 10. Communication equipment checked and working properly.

☐ Yes ☐ No 11. All other equipment and tools inspected and working properly.

☐ Yes ☐ No 12. Disposal arrangements for generated materials in process.

Environmental Management, Inc.

5200 NE Highway 33
Guthrie, OK 73044
(405) 282-8510

CONTINGENCY PLAN IMPLEMENTATION REPORT

DATE _____ TIME OF INCIDENT _____

EMERGENCY COORDINATOR _____

TYPE OF INCIDENT (FIRE, SPILL, EXPLOSION, ETC. _____

ANY INJURIES ☐ YES ☐ NO ANY DEATHS ☐ YES ☐ NO

IF YES TO EITHER QUESTION DESCRIBE _____

LIST THE NAME AND QUANTITIES OF MATERIALS INVOLVED _____

BRIEFLY DESCRIBE THE INCIDENT. INCLUDE SITE SKETCHES IF NECESSARY AND ASSESSMENTS OF ACTUAL OR POTENTIAL HAZARDS TO HUMAN HEALTH OR THE ENVIRONMENT

DESCRIBE THE ESTIMATED QUANTITY AND DISPOSITION OF RECOVERED MATERIALS

PART THREE

3.1 Emergency Evacuation Plan 25

3.2 Emergency Shutdown Procedures 27

3.1 Emergency Evacuation Plan

In the event an emergency situation is determined to be a threat or possible threat to the health or safety of Environmental Management employees, the evacuation of ALL personnel will be accomplished as outlined below. The Emergency Coordinator should utilize the Emergency Response Guidebook for information concerning evacuation potentials (i.e. range of area to be evacuated) and provide this information to outside agencies upon their notification.

1. The Emergency Coordinator may instruct another person to coordinate the evacuation of the facility.

2. The activation of an internal warning signal; in this instance a security alarm and siren system in conjunction with a verbal signal indicates immediate evacuation of ALL employees. The evacuation coordinator should make an announcement similar to: " **Emergency Evacuation Required - ALL employees please proceed to Emergency Assembly Areas.** " The coordinator will provide any special evacuation procedures deemed necessary. Employees may be instructed to bring self-contained breathing apparatus or other emergency equipment from their areas to the gathering area. The location of the incident should also be announced to help personnel avoid the affected area during the evacuation.

3. Upon recognition of the alarm, all employees are to immediately vacate the buildings through assigned primary or secondary exits. Primary exits should be used whenever possible, however, alternate routes may be utilized in certain instances such as obstruction of primary exits, or employees located outside their assigned zones. Facility personnel should congregate at the Emergency Assembly Area located near the front entrance gate adjacent to Highway 33 (depending on wind direction). All personnel should evacuate to the Primary Assembly area, report to a Trained Evacuation Person (Section 3.1.1) and await further instructions.

NOTE: In the event that the planned assembly areas are not safely accessible to the employee, a safe alternative should be used, remembering to stay up-wind. Employees should attempt to reach the primary assembly as soon as safe to do so.

4. The Emergency Coordinator or a designee coordinating the evacuation must conduct a head count of all assembled personnel to determine if any are missing. Using available resources, the EC will attempt to locate any missing persons and instruct them to evacuate the facility immediately. If the missing person(s) cannot be located or if the intercom is inoperable, etc. the EC shall assume responsibility for locating the missing persons.

5. Facility personnel must not return to the facility until permitted by the EC.

6. The EC should assess the situation and develop additional plans as necessary.

3.1.1 Trained Evacuation Personnel

Trained evacuation personnel shall assist the EC with evacuation of employees and head counts once the evacuation has been completed. There should be at least one Trained Evacuation Person for each twenty employees. The employees selected shall be trained or familiar with the facility layout and various alternate escape routes. Trained personnel should also be made aware of employees with disabilities who may require additional assistance and hazardous areas that should be avoided during emergency evacuations. Before leaving the building, these employees will be responsible for checking rooms and other enclosed spaces for employees who may have become trapped or otherwise unable to evacuate. Persons trained in evacuation procedures and their areas of responsibility are as follows:

Trained Evacuation Personnel	Area of Responsibility
President	Building #1 - Top floor South
Compliance Officer	Building #1 - Top floor North
Operations Manager	Building #1 - Bottom floor South
Terminal Manager	Building #1 - Bottom floor North
Maintenance Supervisor	Building #2 - All areas
Terminal Supervisor	Building #3 and Dock #1, #2

The trained evacuation personnel should:

1. Ensure complete evacuation of the assigned area(s).
2. Conduct a head count at the designated assembly area.
3. Report evacuation to the EC.

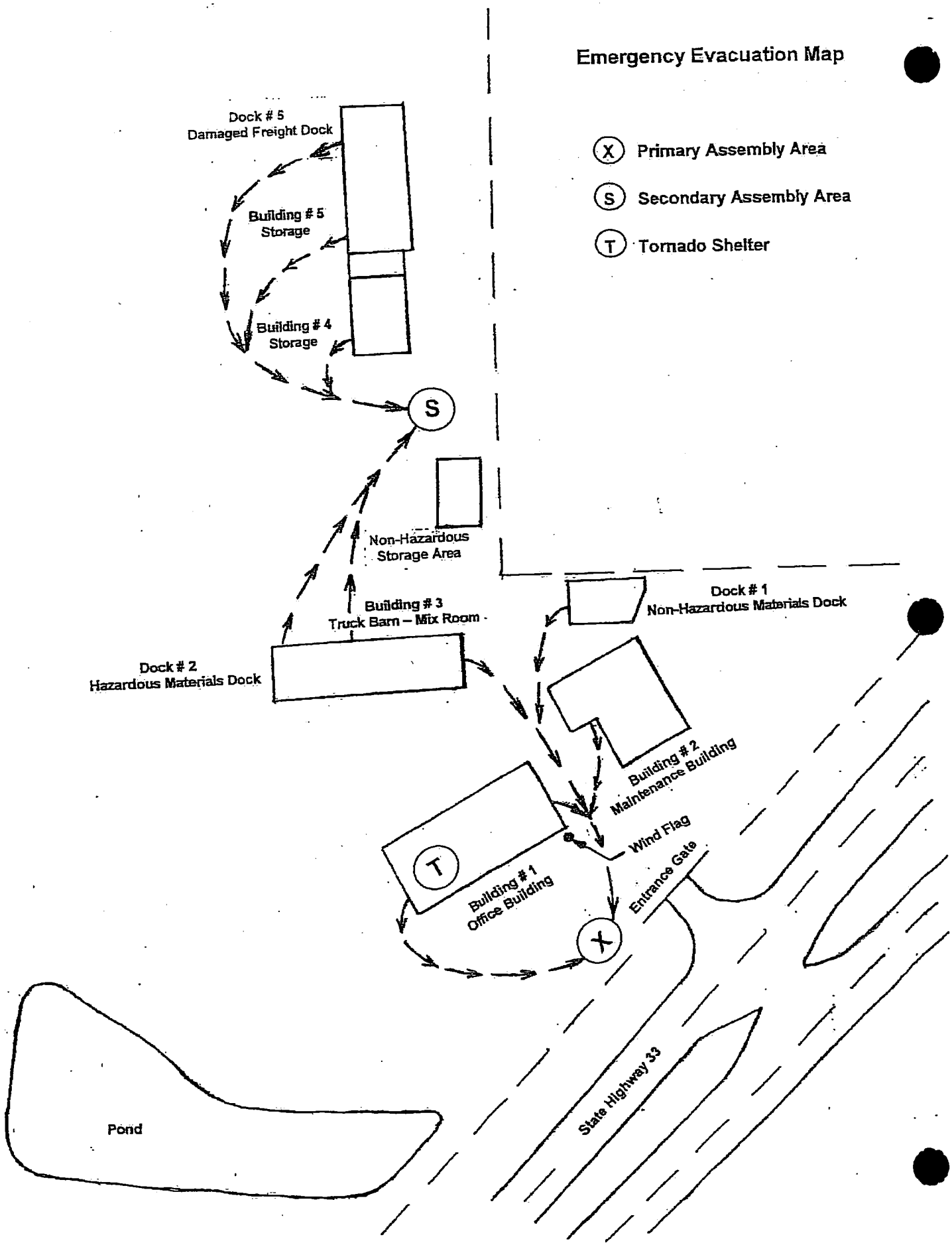
3.1.2 Emergency Evacuation Map

The maps on the following pages illustrate the Environmental Management terminal facility, buildings and the suggested primary evacuation and assembly areas for employees.

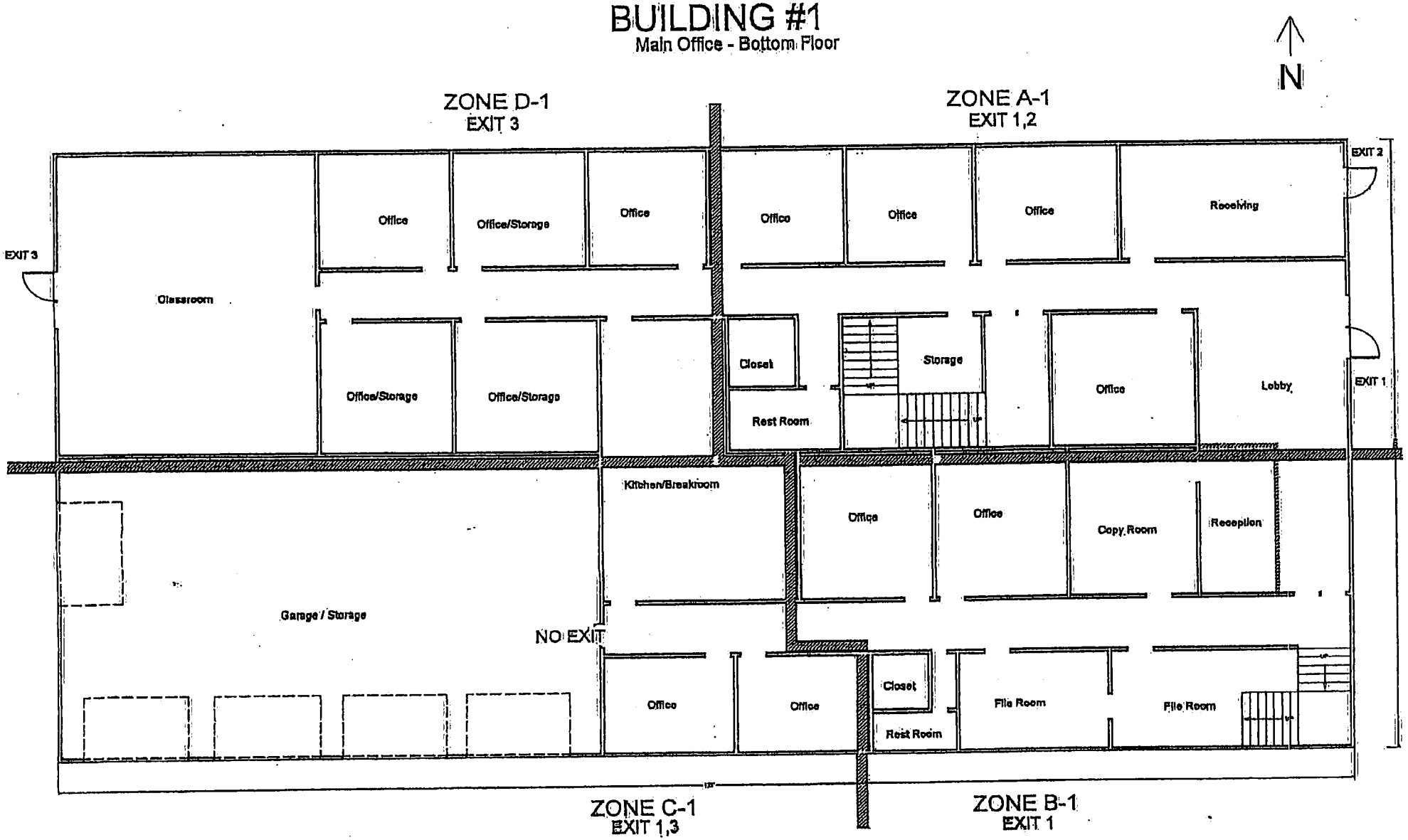
In order to provide an even and convenient flow of personnel through the exits during an emergency evacuation, the entire facility is divided into zones. The zones are separated through the use of wall structures, hallways and imaginary lines. These zones can be readily identified on the following maps. Also included on these charts are the locations of all exits suitable for use during an evacuation.

Environmental Management, Inc.

Emergency Evacuation Map

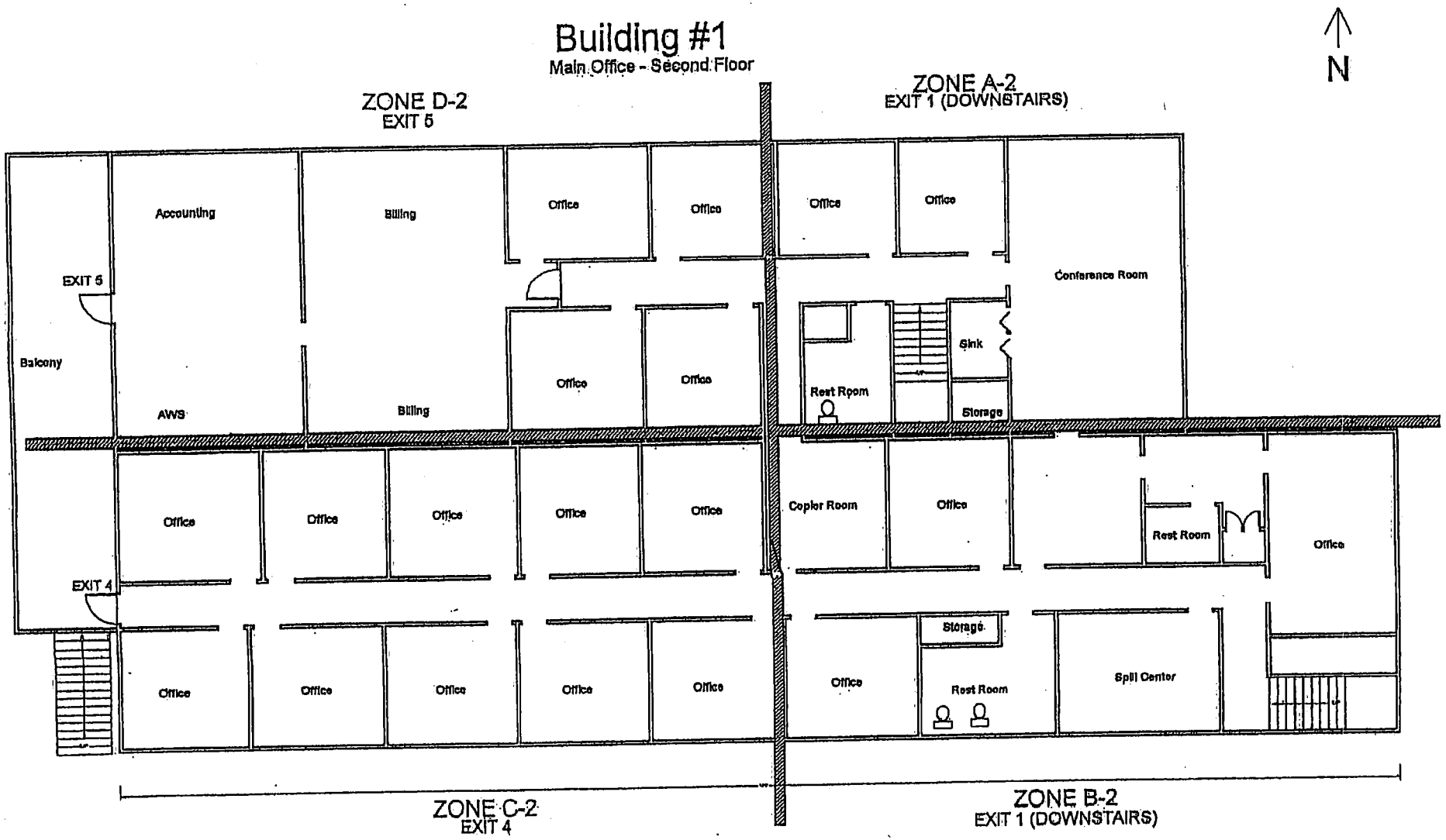


BUILDING #1
Main Office - Bottom Floor



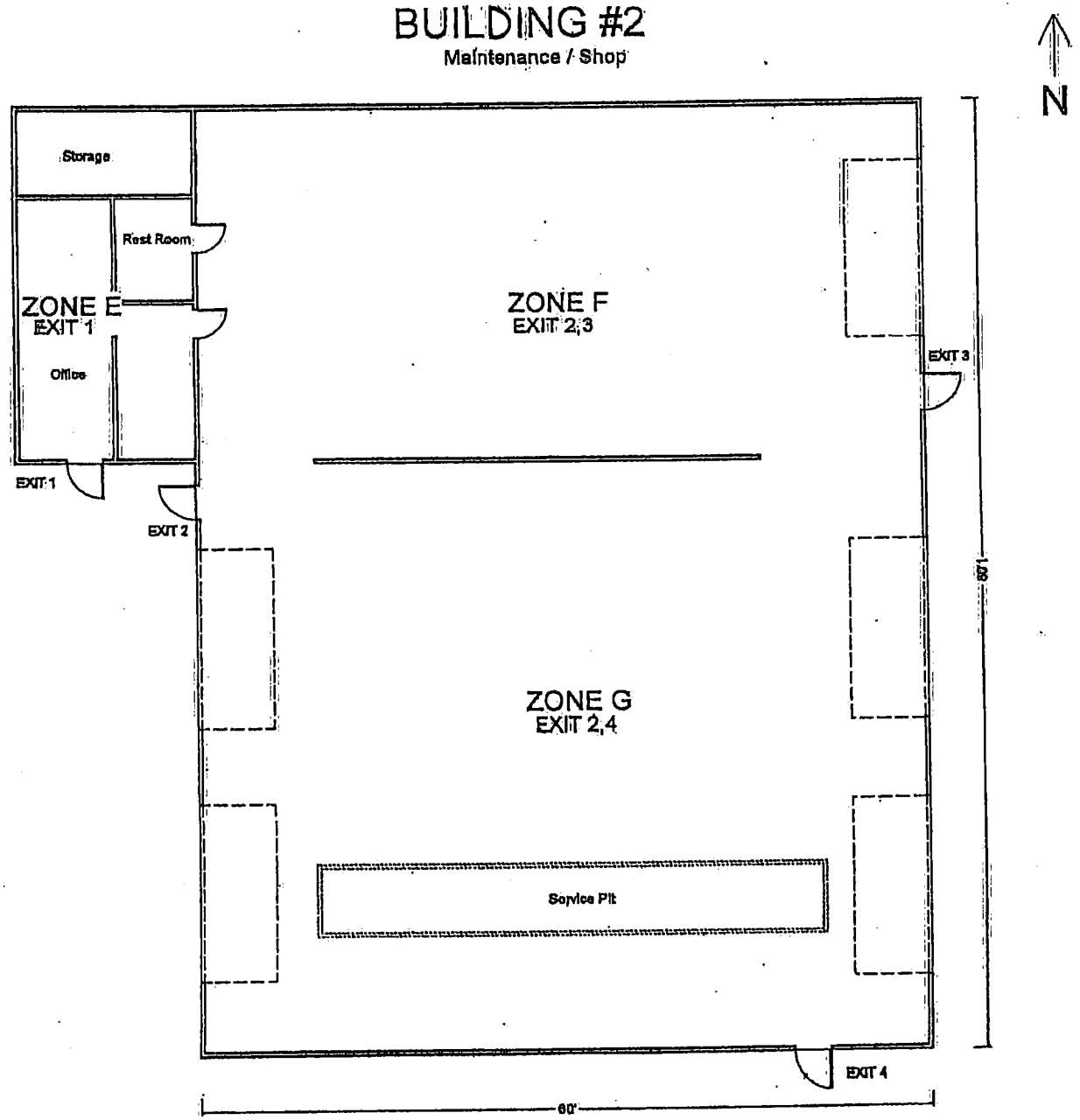
Building #1

Main Office - Second Floor

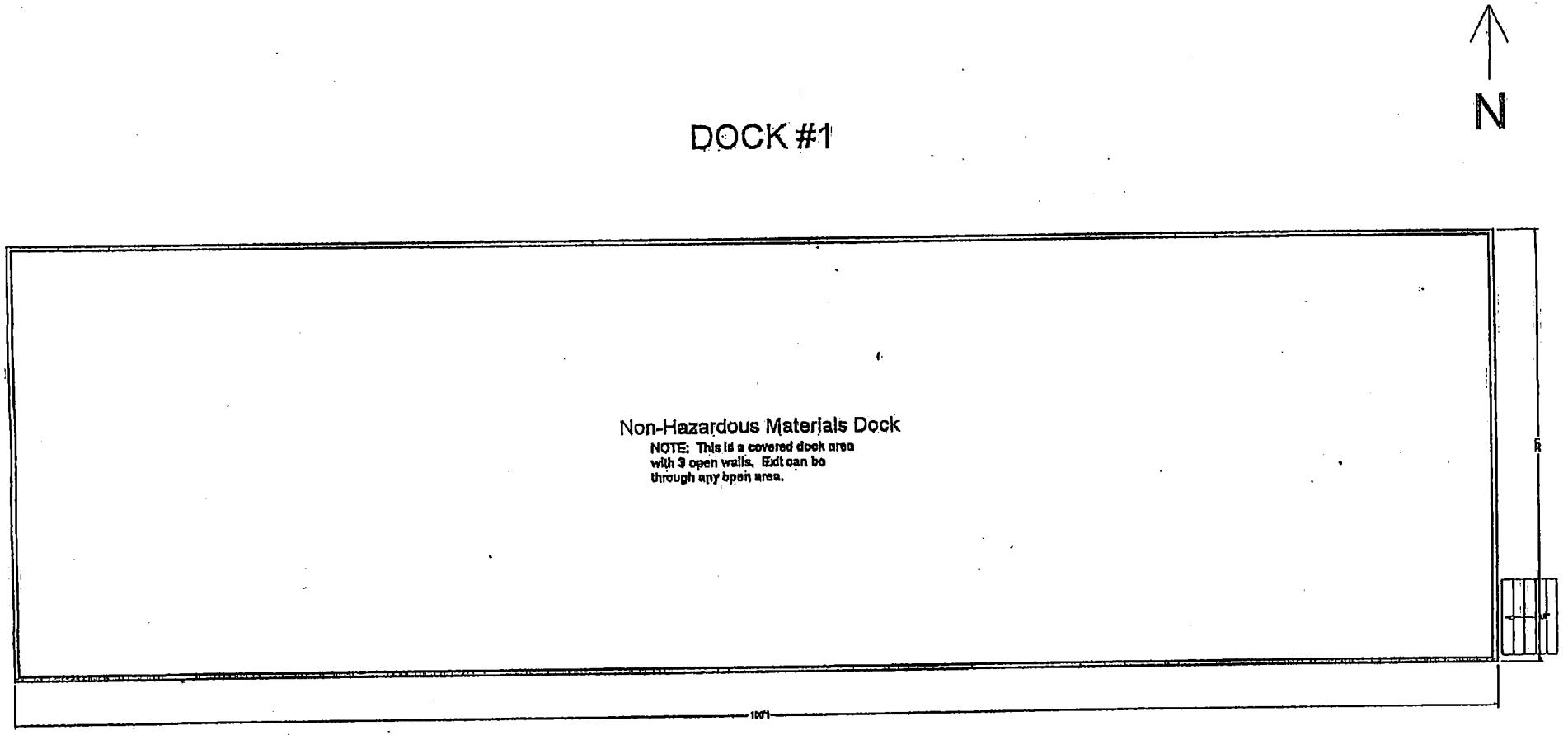


BUILDING #2

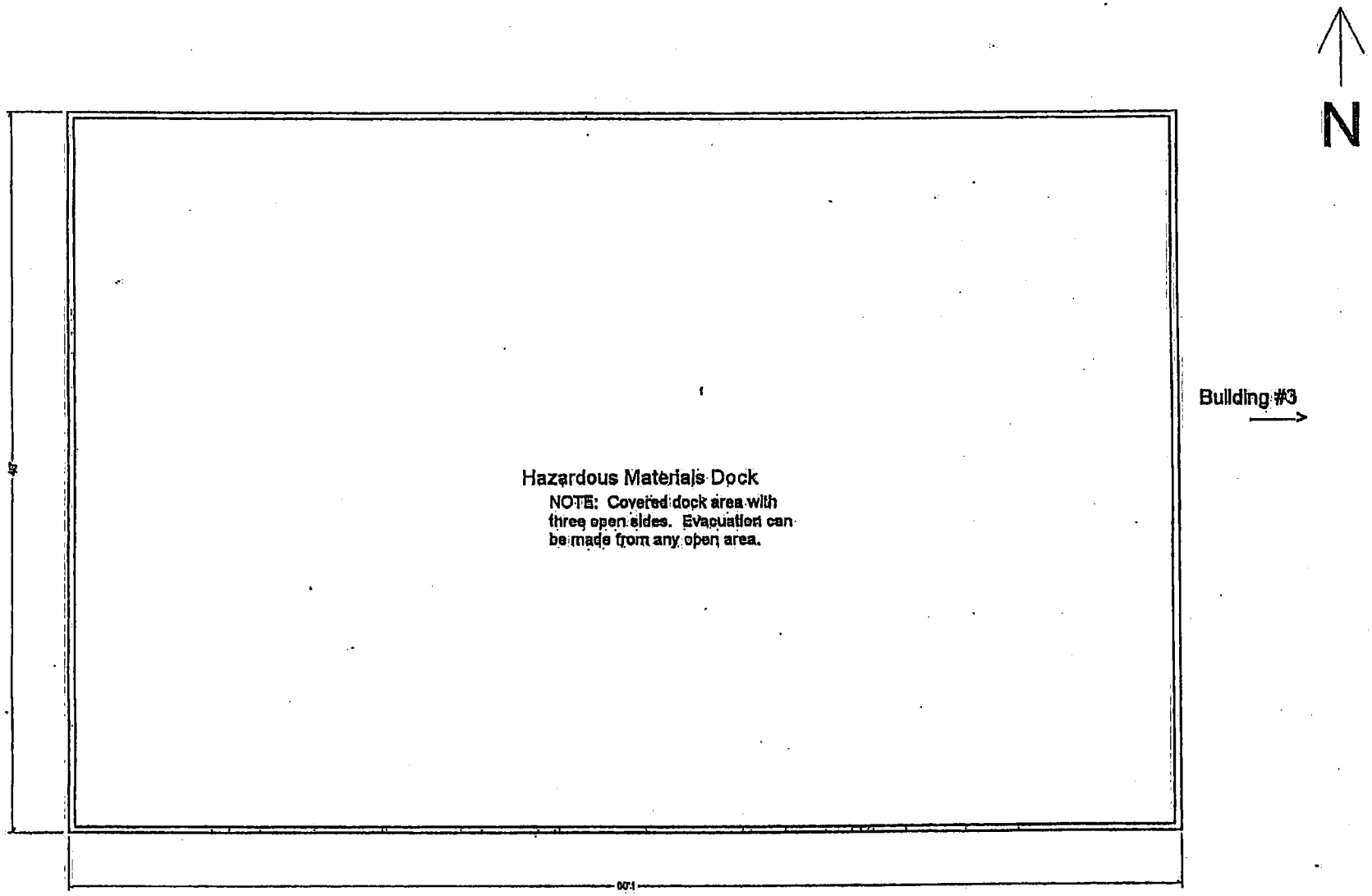
Maintenance / Shop



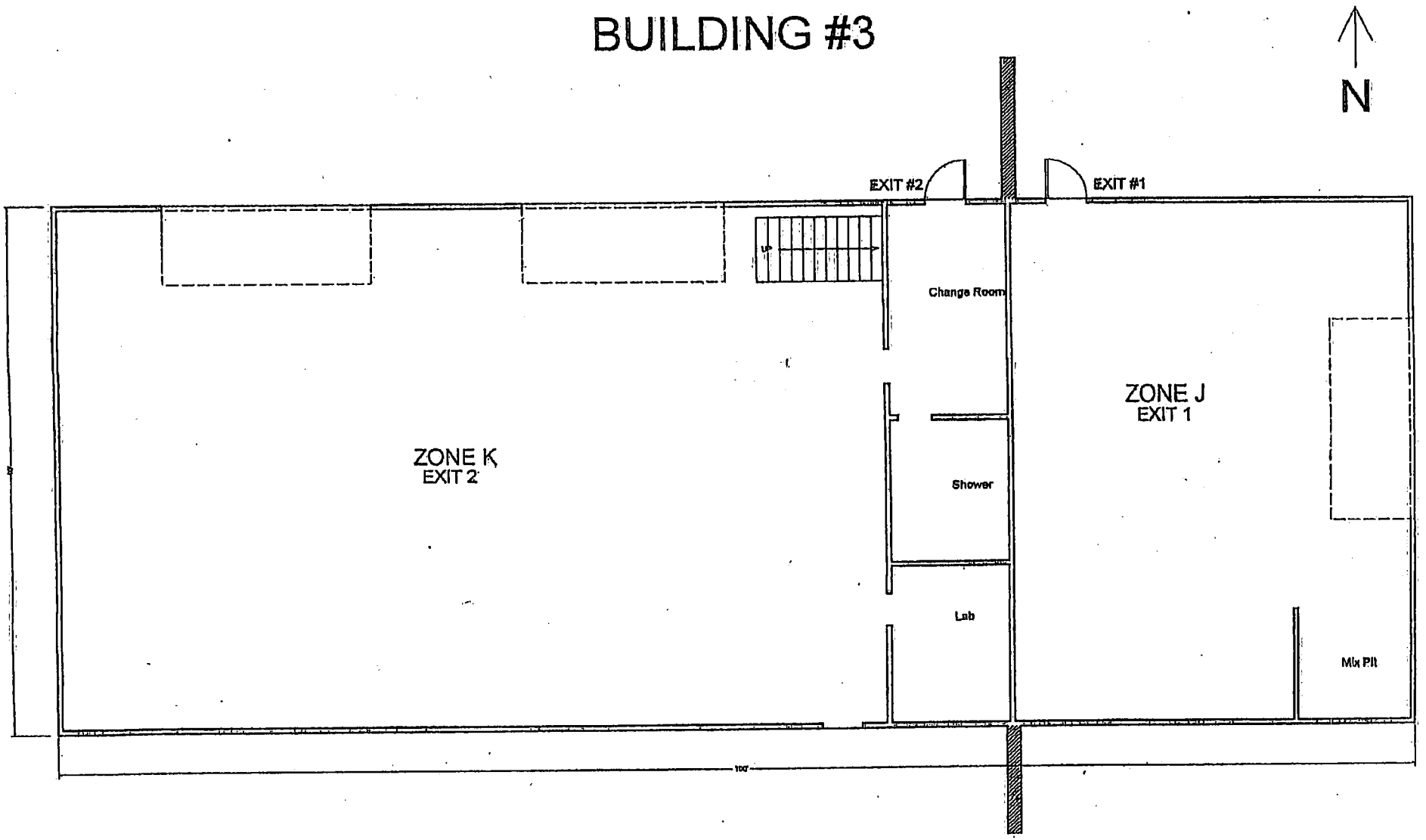
DOCK #1


N
Non-Hazardous Materials Dock
NOTE: This is a covered dock area
with 3 open walls. Exit can be
through any open area.
100'

DOCK #2

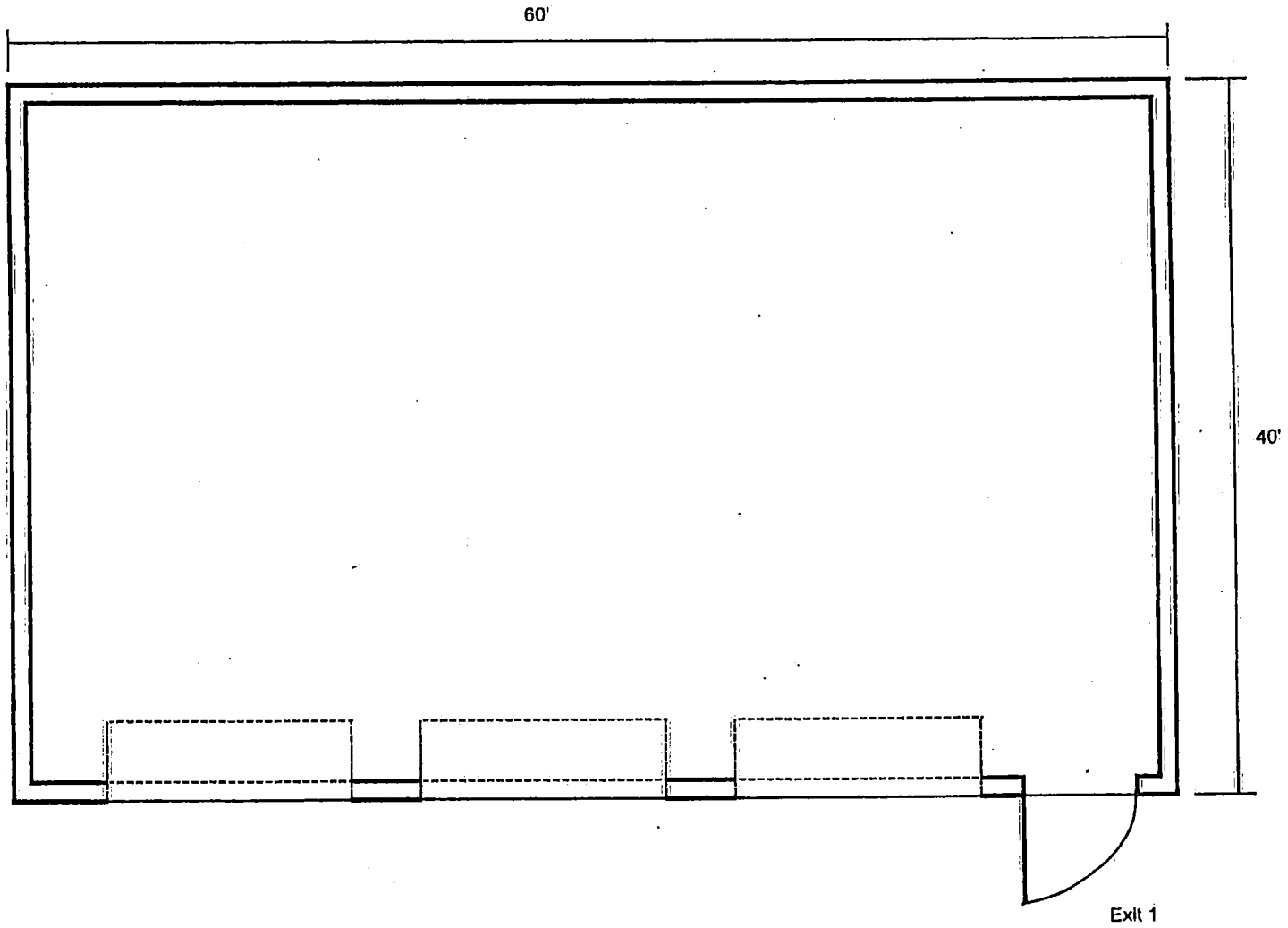

N
Building #3
Hazardous Materials Dock
NOTE: Covered dock area with three open sides. Evacuation can be made from any open area.
60'

BUILDING #3


N
EXIT #2
EXIT #1
UP
Change Room
ZONE K
EXIT 2
ZONE J
EXIT 1
Shower
Lab
Mix Pit
107'

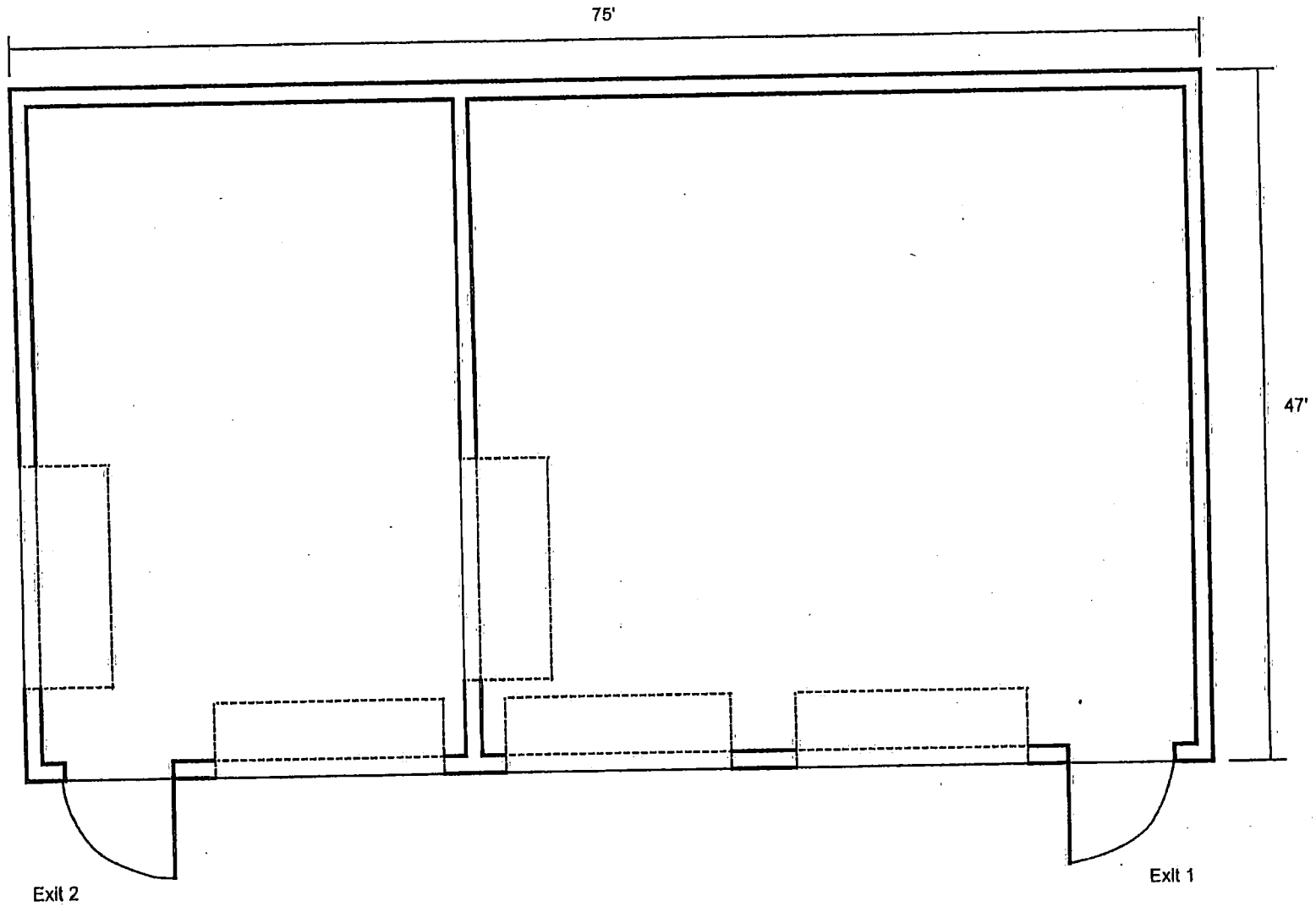
BUILDING # 4

Storage

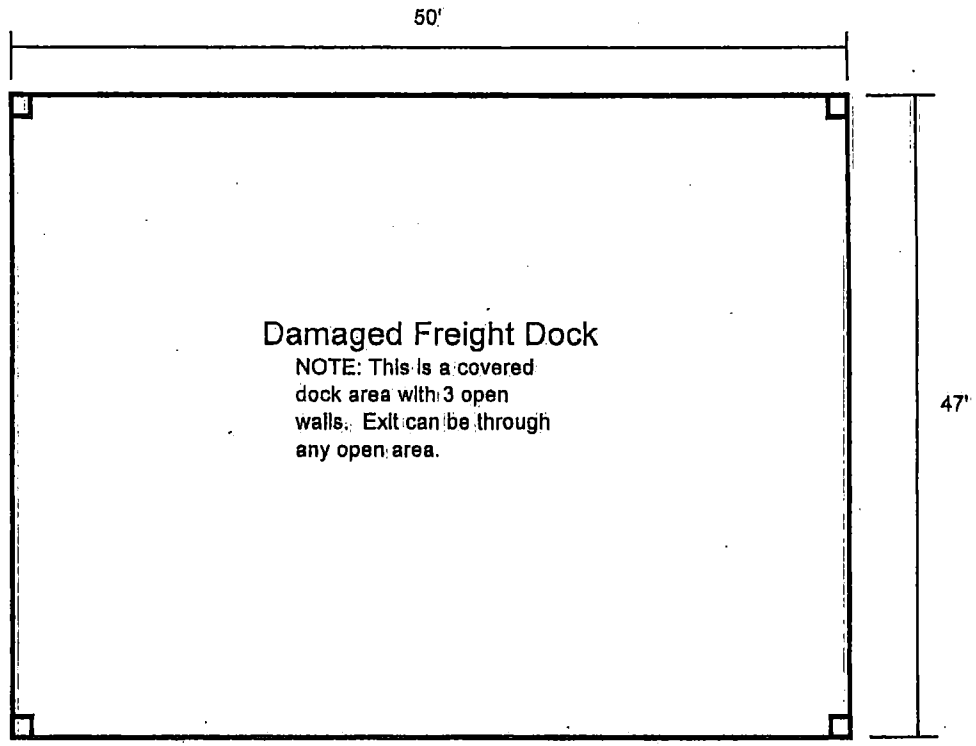


BUILDING # 5

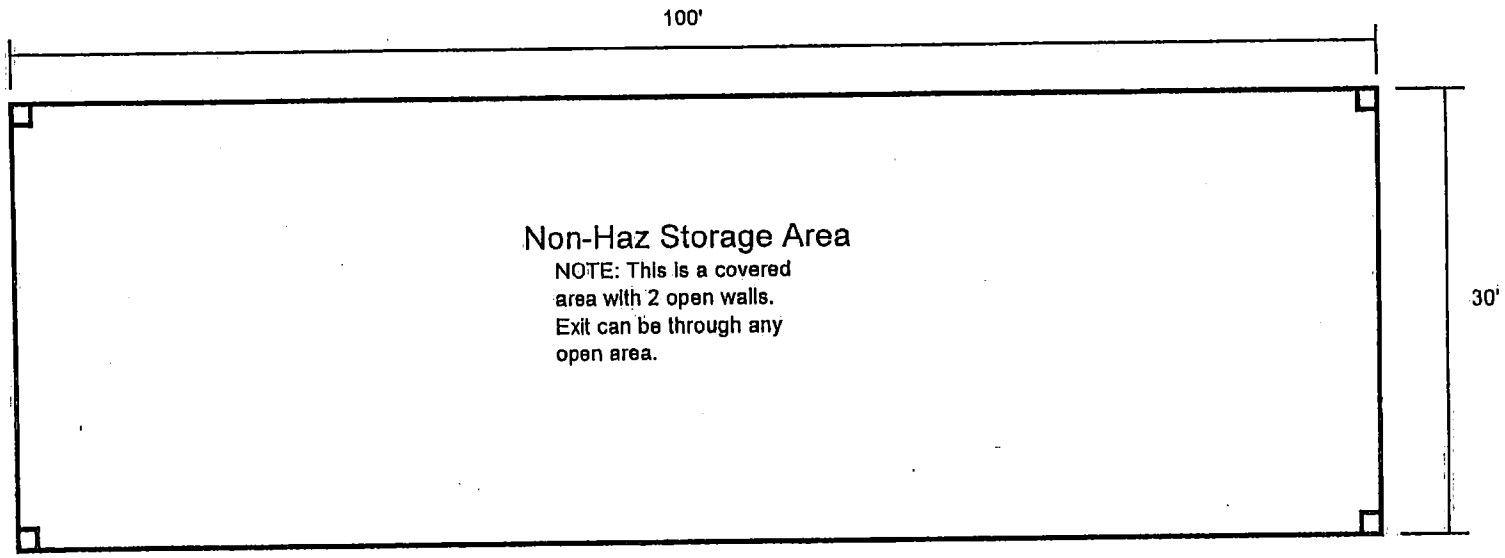
Storage



DOCK # 5


50'
47'
Damaged Freight Dock
NOTE: This is a covered dock area with 3 open walls. Exit can be through any open area.

NON-HAZ STORAGE AREA



3.2 Emergency Shutdown Procedures

In the event an emergency situation requires an immediate discontinuance of the electric, gas and/or water supply to the buildings, the following information is provided:

ELECTRIC SHUTOFF

The main electric power supply is located in the vehicle storage building (Building #3). The location of the electrical shut-off in each building is shown on the site map.

GAS MAIN SHUTOFF

The main gas supply is cut off at the meter located at the entrance gate. The location of gas shut-off in each building is shown on the site map.

WATER MAIN SHUTOFF

The main water supplies are located outside each building. Refer to the site map.

The maps on the following pages should serve as a visual aid in locating and identifying the main supply controls for utilities, location of emergency equipment and the location of first-aid equipment (safety showers).

3.2.1 Utility Shutoff Location Map

The map on the following page illustrates the Environmental Management terminal facility and the locations of cut-off points for public service utilities.

Environmental Management, Inc.

Utility and Safety Equipment Location Map

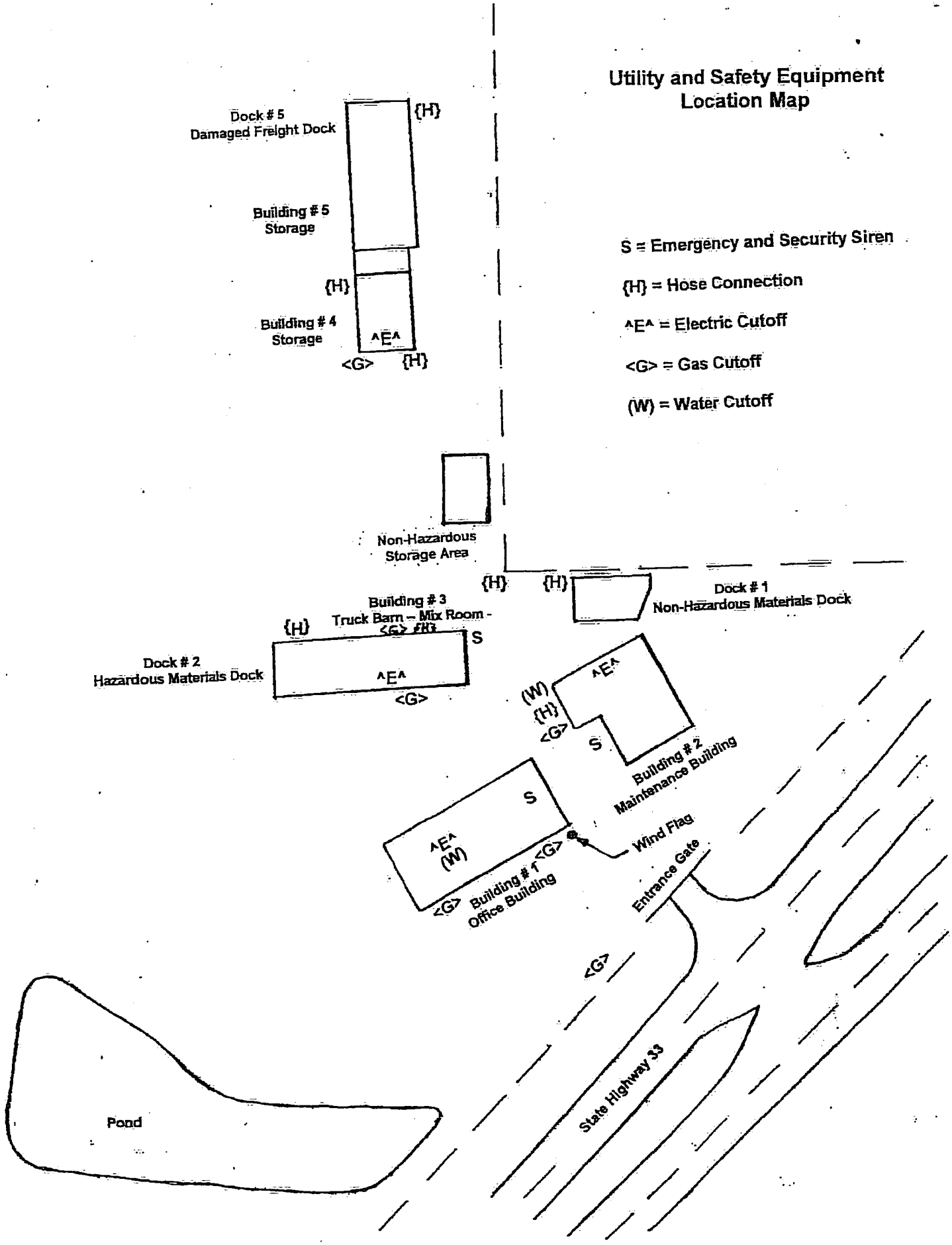
S = Emergency and Security Siren

{H} = Hose Connection

^E^ = Electric Cutoff

<G> = Gas Cutoff

(W) = Water Cutoff

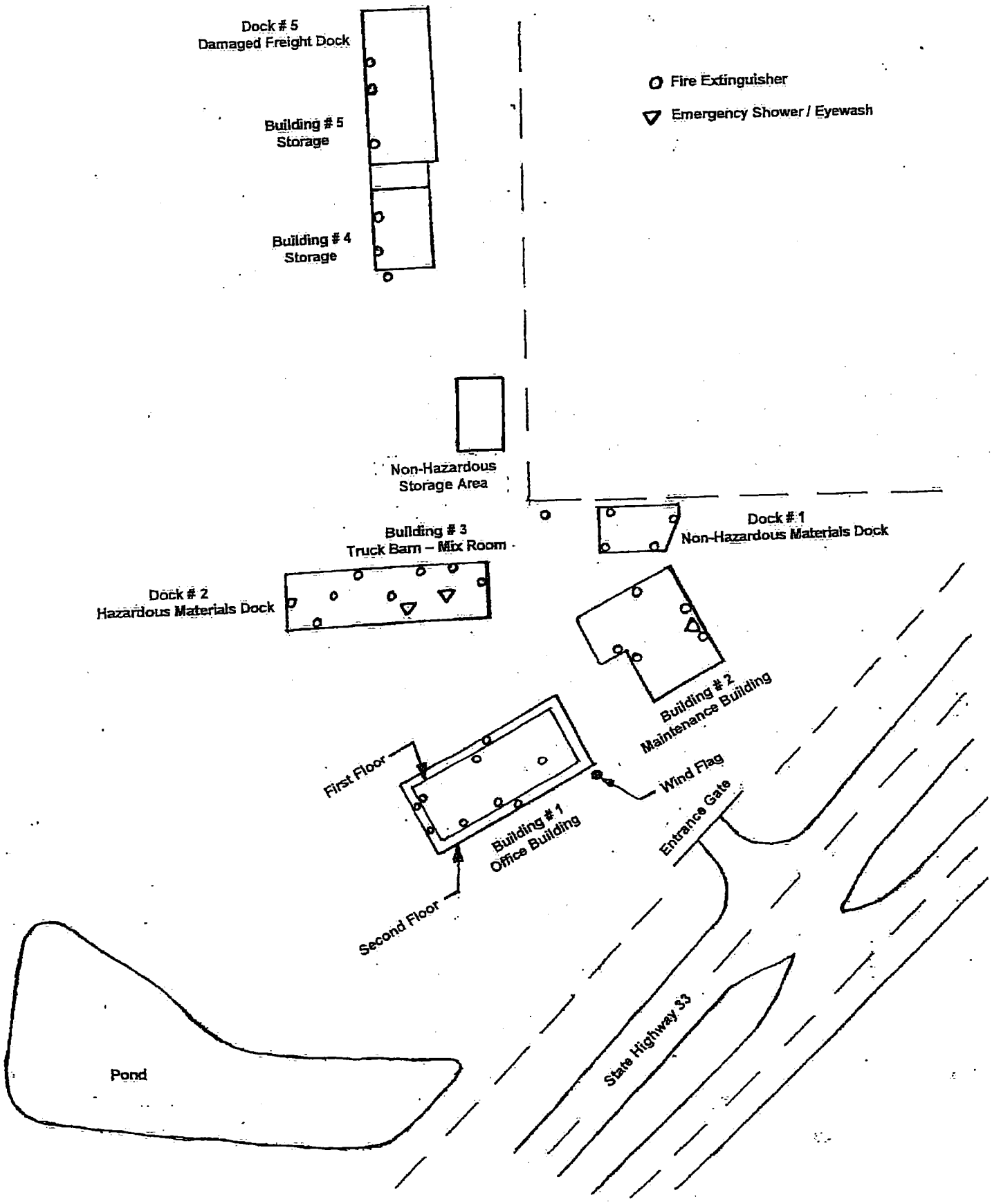


3.2.2 Fire Extinguisher and Emergency Shower Location Map

The map on the following page illustrates the locations of Fire Extinguishers and Emergency Safety Showers within the Environmental Management facility.

Environmental Management, Inc.

Fire Extinguisher / Emergency Shower Map



PART FOUR

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4.2 General Description of Basic Emergency Equipment 32

4.3 First Aid and Safety Equipment 35

4.1 Environmental Management Emergency Equipment List

The following pages provide an outline of the basic emergency equipment available at the Environmental Management facility. All equipment will be made available as required during the implementation of the Contingency Plan.

4.2 General Description of Basic Emergency Equipment

4.2.1 Tyvek

There are three types of Tyvek; **uncoated, PE coated, and Saranex**. Tyvek is used for the protection from harmful chemicals that could adversely affect the body. The suits are typically full length, coverall suits that do not allow certain chemicals to permeate the skin. The color of the suit indicates the type of Tyvek (i.e. White - uncoated; Yellow - PE coated; Gray/White - Saranex).

4.2.2 Respiratory Equipment

Several types of respiratory equipment are available at the Environmental Management facility. Canister, Scott twin cartridge full-face, Scott twin cartridge half-face, SCBA, and Cascade. These various respirators are utilized according to the hazard of the emergency incident.

- The Canister Respirator has a connecting hose which attaches to a large canister, then screws into either a full-face or half-face mask.

- The Full-face Respirator is a full shield mask with a hookup on the front of the shield for two Scott filter cartridges.

- The Half-face Respirator has the same cartridge hook-up as the full-face but without the face shield. With the use of this respirator there is NO eye protection, therefore, Safety Glasses are REQUIRED.

- Self Contained Breathing Apparatus (SCBA) contains a full-face mask with a supplied air tank which is in a pack with shoulder straps. A full tank holds approximately 2216 psi of air and typically lasts throughout 20 minutes of work time.

- The Cascade Respiratory System offers long-time supplies of air by the use of extended air lines attached to large cylinders of breathing air. Each cylinder holds 2500 psi of air and can provide up to three hours of work time. The mask used with the Cascade System is the same as used with the SCBA.

4.2.3 Eye Protection and Safety

Safety glasses, goggles, face shields, and a portable eyewash station are provided by Environmental Management. All employees are advised to wear safety gear to provide proper eye protection.

- Safety Glasses are regular glasses with modified safety features such as side protection. Safety glasses are available in clear or smoke colors (sun protection).
- Goggles are designed to provide more protection than Safety Glasses and also have elastic support to keep them in place. Goggles can typically be worn over other glasses and form a tighter fit around the eye area.
- Face Shields are attached to a helmet to prevent splashes from chemicals. Safety Glasses should be worn under the shield to provide maximum protection.
- Portable Eyewash is a small bottle containing an eyewash solution. This can be used to flush the eye in the event of contamination.

4.2.4 Foot Protection

Environmental Management provides Steel-toe Rubber Boots, Overshoes, Hip Waders, and Chest Waders for employees to use in the completion of their assigned duties.

- Steel-toe Rubber Boots are designed to protect the foot and lower region of the leg from the possibility of contamination.
- Overshoes are for use over street shoes or work boots and serve to protect the foot from contamination while providing the convenience of your own shoe or work boot underneath.
- Hip Waders protect the lower half of the body in the event of a large spill or from contaminants in a lagoon.
- Chest Waders are similar to Hip Waders and extend the protection to the chest area.

4.2.5 Hand Protection

Surgical Gloves (Derma Thin), Natural Latex, Rubber, Nitrile, PVC (Neo-Hyde), and Cotton Gloves are provided for Environmental Management employees who require their use. Employees are advised to review the hazards of the chemical before deciding which type of glove to use.

- Surgical Gloves (Derma Thin) are thin latex gloves that provide a bare minimum of protection.
- Natural Latex Gloves provided added protection over the surgical glove but still only provide average protection.
- Poly-Vinyl Chloride (PVC) coated gloves are used in extremely hazardous spill cases. These are thick gloves that provide a higher level of protection than natural latex.
- Nitrile Gloves offer medium protection with specific resistance to certain chemicals.
- Rubber Gloves are heavy duty gloves with specific resistance - especially for pesticides.
- Cotton Gloves are for use on light duty jobs not involving hazardous chemicals or substances. They can be used as liners under any of the above glove types to increase protection.

4.3 First-Aid and Safety Equipment

A first aid station is located in the Maintenance Building Office area and in the Main Office Building near the Training Room. Both provide items for immediate medical aid when used properly by trained employees. Many Environmental Management employees are registered Emergency Medical Technicians and can provide medical aid if it is required.

4.3.1 Basic Trauma Kits

All response vehicles contain either First-Aid or Trauma Kits that provide at a minimum the following items:

First Aid Kits:

- CPR Masks
- Protective Gloves
- Eyewash
- Cold Pack
- Large Wound Dressing
- Various Bandages
- Band Aids
- Tape
- Gauze pads and rolls
- Antiseptic Cream
- Burn Cream or ointment

Trauma Kits: (in addition to the above items)

- Blood pressure kits
- Splints
- Irrigation water
- Neck Braces
- Leg and Arm Splints
- Trauma Blankets
- Burn Sheets
- Thermometers

4.3.2 Safety Shower Location Maps

The map on the following page shows the location of the various Safety Showers at the Environmental Management facility.

PART FIVE

5.1 Company Responsibilities 37

5.2 Employee Responsibilities 38

5.1 Company Responsibilities

Environmental Management, Inc. (Environmental Management) is firmly committed to the provision of a safe and healthy working environment for each and every employee. It is important that workers are aware of the identity and toxic or hazardous nature of the products with which they deal in the course of their job duties. Therefore, in compliance with regulations and care of the staff, a written Safety and Health Plan has been established.

Environmental Management supervisors ensure that all chemical material containers in their respective areas are properly tagged, labeled or marked with their identity and appropriate hazardous warnings posted. All labels applied shall not conflict with the Department of Transportation (DOT), the Environmental Protection Agency (EPA.), or the Occupational Safety and Health Administration (OSHA) standards and regulations.

Environmental Management employees shall be made aware at all times of the location of Material Safety Data Sheets and Chemical Materials Lists.

5.2 *Employee Responsibilities*

The success of the Contingency Plan depends to a great extent upon the cooperation of every employee. Therefore, employees should be alert to the potential hazards and of all materials located in their work area and should consult the Material Safety Data Sheets for specifics concerning hazardous chemicals and materials.

Employees are to actively participate in the execution of the Contingency Plan. This will aid in the continued reduction of chemical related illnesses and injuries at the Environmental Management facility and/or job sites.

5.2.1 Rules for Working at the Environmental Management Facility

1. Be ready to begin work at 8:00 a.m.
2. Wear safety glasses at all times when working with chemicals or in areas posted requiring the use of protective eyewear.
3. Wear Tyvek apron or coveralls when directly handling waste materials.
4. Wear rubber gloves; derma-thins with cotton gloves is acceptable.
5. Steel-toe rubber boots are recommended foot wear.
6. When handling anything other than empty drums, <u>two people</u> should be present.
7. Eye washes should be full and pressured when areas of work do not have permanent eye wash stations.
8. NO smoking except in the designated area outside the shop office and outside the training room.
9. Wash hands before eating or drinking anything or before smoking and using tobacco products.
10. When pouring or transferring materials do so over a catch basin or use Visqueen (plastic sheeting) as a catch area.
11. All drums and/or containers must be securely covered before leaving the area.
12. No liquid or solid is to be placed into a drum that cannot be sealed.
13. Bulking tanks or other tanks, unless empty, must be covered and closed.
14. All drums containing materials <u>MUST</u> be labeled with the appropriate label and Environmental Management identification.
15. All full drums must be placed in contained (diked) storage areas.
16. All empty drums are to be neatly stacked in drum racks on their side or upside down at all times.
17. Stop work no earlier than 1645 hours to police areas and close up.
18. Before leaving the Environmental Management yard:
    a) Be sure all drums are covered
    b) Be sure all roll-off and mix tanks are covered
    c) Pick up trash
    d) Pick up and clean all tools and work areas
    e) Change out of Tyvek and wash up.
    f) Turn off lights, fans, etc. and lock building (if you are last one out of the building)
    g) Close and LOCK gates

PART SIX

6.1 Summary of OSHA 29 CFR 1910.120 40

6.2 Hazardous Communication Standard 29 CFR 1910.1200 42

6.3 Employee Awareness Training 43

6.1 Summary of OSHA 29 CFR 1910.120

The Occupational Safety and Health Administration (OSHA) issued the OSHA Standard for Hazardous Waste Operations and Emergency Response found in 29 CFR 1910.120. This standard is also referred to as "HAZWOPER". The final rule, as well as an interim final rule issued earlier by OSHA, were promulgated in response to a requirement imposed by Congress in the Superfund Amendments and Reauthorization Act of 1986 (SARA) (as amended). The final rule was promulgated on March 06, 1989, and the deadline for compliance was March 06, 1990.

This rule regulates the safety and health of employees involved in government-mandated cleanup operations at uncontrolled hazardous waste sites; in certain hazardous waste treatment, storage and disposal (TSD) operations conducted under the Resource Conservation and Recovery Act (RCRA) of 1976 as amended (42 U.S.C. 6901 et seq.); and in any emergency response to incidents involving hazardous substances.

Paragraph (q)(6)(i) and (ii) of the standard deal with the training requirements of employees designated as First Responder Awareness Level or First Responder Operations Level in situations requiring emergency response to hazardous substance releases.

Training shall be based on the duties and functions to be performed by each responder. The skill and knowledge levels required for all responders shall be conveyed to them throughout the training before they are permitted to take part in any actual emergency operations.

6.1.1 First Responder Operations Level Training

First responders at the operations level are individuals who respond to releases or potential releases of substances as part of the initial response to the site for the purpose of protecting nearby persons, property or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight (8) hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level and the employer shall so certify:

1. Knowledge of basic hazards and risk management techniques.

2. Know how to select and use proper personal protective equipment provided to the first responder operational level.

3. Understand basic hazardous material terms.

4. Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available.

5. Know how to implement basic decontamination procedures

6. Understand the relevant standard operating procedures and termination procedures.

6.2 *Hazardous Communications Standard 29 CFR 1910.1200*

Under the Hazardous Communication Standard (HCS) employers must establish a training and information program for all employees routinely exposed to hazardous chemicals in their work area. This training must be provided at the time of initial assignment and whenever a new hazard is introduced into their work area. The regulations for training can be found in 29 CFR 1910.1200 (h).

Training serves to explain and reinforce the information presented to employees through labels and Material Safety Data Sheets (MSDS). The use of labels and MSDS will only be successful when workers understand the information presented and are aware of the actions to be taken to avoid or minimize exposure and the occurrence of adverse effects.

Training is critical to maintain constant and effective hazard communications. Hazard information presented during training educates workers to take protective action and thus helps decrease the possibility of occupationally related chemical-source illness and injuries. The Occupational Safety and Health Administration (OSHA) requires a thorough compliance effort in the area of safety training.

The HCS's provisions are performance oriented, listing categories of information to be provided to employees without specifying how to accomplish the goal. Ideally, an employer will tailor his/her facility's education and training program to the particular needs of their employees. If there are employees who have little or no formal education with respect to hazard communication, the training should be directed at an understandable level; and if some are non-English speaking, an interpreter will be required.

The key term is "understanding". Not only must employees be trained but they must understand the training and what to do with the knowledge obtained. The training should include an opportunity for employees to ask questions and ensure they understand the information presented to them.

If it is determined through audits, inspections etc. that the training is inadequate (e.g. inspector detects a trend in employee interview responses that indicate training is not conducted sufficiently), a closer review of the training process and training documentation will be necessary.

6.3 Employee Awareness and Training

6.3.1 Employee Awareness

At the time of an emergency, the Emergency Coordinator (EC) should recognize the type of evacuation necessary and their role in carrying out the Contingency Plan. In cases where the situation is Immediately Dangerous to Life and Health (IDLH) of employees, a total and immediate evacuation of all employees is necessary. In other emergencies, a partial evacuation of non-essential employees from the immediate area with a delayed further evacuation may be necessary. It must be assured through employee training and direction what is expected during an emergency to assure their safety.

Employees should be aware of their responsibilities in the event that they are the first person to discover an emergency situation. The Compliance and Safety Officer has developed procedures for responding to an emergency, depending on what the type of emergency. The following guidelines however apply to all emergencies.

1. All employees should be aware of safe evacuation procedures, and refresher training shall be conducted whenever the employee's responsibilities or designated actions under the plan change, or when the plan itself is changed. In addition, the employer must review with each employee, upon initial assignment, the parts of the plan pertinent for the employee to protect themselves and others in the event of an emergency.

2. Employees should be aware of building floor plans and workplace maps that indicate escape routes to be used in the event of an emergency. Floor plans and maps shall be posted throughout the facility to aid the employee and provide guidance in the event of an emergency.

3. Employees should be aware of safe evacuation methods (i.e. use of stairwells, etc.).

4. No employee shall be permitted authorization to re-enter the area until approved by the EC or their designee.

There are no critical plant systems that would require employees to remain behind during an evacuation. The EC or their designee will conduct head counts once the evacuation has been completed. Each employee should report to his or her immediate supervisor upon reaching the assembly area.

All personnel should be made aware of employees with disabilities that may need extra assistance. Before leaving the area, employees should quickly survey the room to ensure that all employees are aware of the need to evacuate.

6.3.2 Employee Training Policy

Each new employee shall receive the following training:

1. A minimum of 40 hours classroom training pursuant to EPA, Title 40 CFR, Part 264 and 265, and 29 CFR 1910.120. (As required for their specific job assignment)

2. A minimum of 24 hours classroom training in 49 CFR Chapter 1, Subchapter B, Parts 390-399.

3. A minimum of 16 hours classroom training in 49 CFR Subpart C, HM 181 and 126-F.

4. At least 24 hours on-the-job experience/training as per 1910.120 requirements.

5. A minimum of 8 hours classroom training per 29 CFR 1910.1200.

6. A minimum of 1 hour training per 49 CFR 391.119.

7. Any additional specialized training to fit specific job assignments.

Each employee will receive the following annual refresher training:

1. An 8-hour refresher course on 29 CFR 1910.120.

2. Hazardous Communications training per 29 CFR 1910.1200.

3. Biannual updates on HM 181 and 126-F.

All employees training shall be documented and all training records shall be kept on file at the Environmental Management facility.

6.3.3 Emergency Response Personnel Training

Each member of the company response team has extensive training in the handling of most types of hazardous materials including but not limited to: compatibility's, personal dangers, environmental hazards and knowledge in the use of reference materials for obtaining detailed information on a specific material. This training is gained both in the classroom, through formal training, and during day-to-day experience.

The Emergency Coordinator knows the location of necessary equipment and is proficient in its use and limitations. Training in the operations and use of all types of equipment available is provided on a day-to-day basis as on-the-job training. In some instances heavy equipment operators may be subcontracted through local sources. Under these circumstances the EC will provide brief training in the proper use of the equipment prior to its use by an employee.

All response team members constantly receive education in different fields of hazardous materials handling. Those involved in the handling, storage and transportation of hazardous materials receive training that meets or exceeds DOT, EPA, OSHA and RCRA requirements. Several Environmental Management response employees are nationally certified Emergency Medical Technicians (E.M.T.'s). Others have received extensive training concerning immediate first aid and CPR procedures.

All employees who deal with hazardous materials have the potential for exposure. Therefore, they are appropriately informed and trained to these potential hazards. The information offered meets or exceeds the requirements of the Hazardous Communications Standard as follows:

1. Hazardous chemicals present in work areas.
2. The location and availability of a written hazardous communication program.
3. Required listing of hazardous chemicals and Material Safety Data Sheets

The training shall include:

1. Records and observations that may be used to detect the presence or release of a hazardous material in the work area.
2. Physical and health hazards from chemicals in the work area.
3. Measures the employee can take to protect themselves from hazards in the work area including specific procedures the company has implemented to protect employees such as: appropriate work practices, emergency procedures and personal protective equipment usage.

All Environmental Management employees will be trained in the major areas of the Hazardous Communications Program. The most important areas are as follows:

1. Labels - every container labeled as to content/hazards
2. MSDS - technical information provided by the manufacturer
3. Chemical Material List - all potential hazardous materials present at the facility.

PART SEVEN

7.1 Hazard Material Types 47

7.2 Hazard Safety Acknowledgement Form 48

7.1 Stored Materials at the Environmental Management Facility - Hazard Types

The Environmental Management, Inc. (Environmental Management) terminal located in Guthrie, Oklahoma, serves primarily as a staging area for outside activities and as a temporary storage facility for hazardous and non-hazardous materials. Environmental Management will maintain various quantities of chemicals and chemical waste products stored in 55, 30, 15 and 5-gallon drum containers, a bulk wastewater tank, bulk waste oil tanks, and bulk dry storage bags.

The general types of hazardous materials that could be generated at this facility are equipment wash water, corrosives and halogenated/non-halogenated solvents.

F001	Spent halogenated solvents
F002	Spent halogenated solvents
F003	Spent non-halogenated solvents
F005	Spent non-halogenated solvents
D001	Lab pack wastes (flammable)
D001	Equipment wash water, non-halogenated solvents
D002	Lab pack wastes (corrosives)
D001-D011	Contaminated Soils
D001-D011	Contaminated Solids
D004-D011	
D010-D011	Lab pack wastes (toxic)

Environmental Management also manages a wide variety of hazardous waste. The following Environmental Protection Agency listed hazardous waste codes are managed at the Environmental Management facility:

- All wastes from Conditionally Exempt Small Quantity Generators (CESQG); EPA Waste Codes D, F, K, P and U
- Soils and debris contaminated with spilled material of any of the above items
- Soils and debris contaminated with petroleum hydrocarbons from spill remediation
- Used oil transporter (stored on-site <35 days)
- Non-hazardous wastewaters
- Heels from tanker truck cleanouts
- Asbestos (transporter only)
- Wastes from Small Quantity Generators (SQG) and Large Quantity Generators (LQG); EPA Waste Codes D, F, K, P and U (under transporter provisions and stored on-site less than 10 days).

All hazardous materials are stored within containment dikes whenever possible. Chemical inventories are kept to a minimum in an effort to lower the risk factor of an emergency situation and incompatible or potentially reactive materials are stored in separate locations.

7.2 *Hazard Safety Acknowledgement Form*

I, _____ , an active employee of Environmental Management
Printed Name
Inc., am fully aware of the dangers involved in working with and around the various hazardous materials encountered on a daily basis associated with my job.

I realize that I have the right to request at any time, the contents, as well as any technical information available, (i.e. Chemical Inventory Lists and Material Safety Data Sheets), pertaining to materials with which I work.

I agree to exercise and comply with all precautionary measures set forth by O.S.H.A. Regulations and/or Company Mandates. It is my understanding that Environmental Management will provide all necessary safety equipment needed to perform my job duties.

I also understand that I may request additional levels of safety equipment at any time I personally feel they are needed.

I further agree not to perform any task that would require expertise beyond my level of training.

Employee	**Witness**
_____	_____
Signature	Signature
_____	_____
Date	Date

PART EIGHT

8.1 Local Agency Listing and Emergency Numbers 50

8.2 Amendments to the Contingency Plan 52

8.3 Coordination Agreements 53

8.4 Contingency Plan Implementation Acceptance Statement 54

8.5 Distribution of the Contingency Plan Manual 55

8.1 Local Agency Listing of Emergency Numbers

8.1.1 Guthrie Fire Department and Ambulance Service

P.O. Box 908
Guthrie, OK 73044

911 or 282-4433

In the event of an emergency, the Guthrie Fire Department is to be the primary responder notified. When contacted provide the following information:

Name and phone number of person submitting the report
Name and address of the facility (or location of the emergency incident)
Nature of the emergency (class of fire, explosion, etc.)
Call back number

The Guthrie Fire Department will coordinate activities and supply manpower and various pieces of equipment in the event of a fire or other emergency. The fire department will make contact with other information or backup services and will request additional assistance as needed. Should more assistance be required, the Guthrie Fire Department will request mutual aid from Oklahoma City, Edmond, and Midwest City Fire Departments.

8.1.2 Logan County Sheriff

301 East Harrison
Guthrie, OK 73044

911 or 282-4100

The Logan County Sheriff serves as a primary source of contact in the event fire department service is needed. The Sheriff's Department will assist in emergency situations where security and/or evacuation of the local vicinity are required. When requesting their assistance the following information should be provided:

Name and phone number of person submitting the report
Name and address of the facility (or location of the emergency incident)
Nature of the emergency (class of fire, explosion, etc.)
Call back number

8.1.3 Logan County Hospital

Highway 33 and Academy Road
Guthrie, OK 73044

282-6700

In the event an emergency situation is determined to be a threat to the health of the surrounding vicinity, or if an injury of an employee requires Emergency Medical Assistance (ambulance), the Logan County Hospital must be notified and supplied with the following information:

Name and phone number of person submitting the report
Name and address of the facility (or location of the emergency incident)
Nature of the emergency (class of fire, explosion, etc.)
Name and types of materials involved
Assessment of actual or potential hazards to human health and/or the environment
Identification of other agencies already contacted for assistance
Call back number

8.1.4 Logan County OEM

301 East Harrison
Guthrie, OK 73044

282-0494 or Mobile Number 659-2815

In the event an emergency situation is determined to be an actual or potential hazard to the health and safety of the surrounding vicinity, the Logan County OEM is to be notified and supplied with the following information:

Name and phone number of person submitting the report
Name and address of the facility (or location of the emergency incident)
Nature of the emergency (class of fire, explosion, etc.)
Name and types of materials involved
Assessment of actual or potential hazards to human health and/or the environment
Identification of other agencies already contacted for assistance
Call back number

8.2 Amendments to the Contingency Plan

The contingency plan will be reviewed and immediately amended, if necessary, whenever:

1. The plan fails in an emergency;

2. The station changes (in its design, construction, operation, maintenance, or other circumstances) in a way that increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency;

3. The list of authorized Emergency Coordinators changes; or

4. The list of emergency equipment changes.

8.3 Coordination Agreements

The Contingency Plan has been submitted to local authorities that may be involved with Contingency Plan implementation. (See Section 8.5 - page 55; Distribution of the Contingency Plan Manual). Environmental Management, Inc. will conduct orientation tours for all local and state authorities (if they so desire) who should be familiar with the facility operations. Local authorities (e.g. fire departments, hospitals, police, and ambulance service) have been contacted with regards to the Environmental Management facility contingency plan. Agencies provided with a copy of the plan are identified in Section 8.5 page 55 of this document.

Chemical burns, smoke or fume inhalation, heat burns, contusions, fractures, back injuries, and eye injuries are the most probable type of injuries to be noted. The potential locations of incidents include the following:

Maintenance Shop Facility - Building #2

Non-Hazardous Dock - Dock #1

Mix Room and Truck Barn - Building #3

Hazardous Materials Dock - Dock #2

Damaged Freight Dock – Dock # 5

If no evacuation is necessary, the agencies may direct traffic along the highway, which parallels the facility, to ensure that it does not become congested. They may also direct traffic that is entering the facility in response to the emergency. If a major accident occurs, law enforcement officials may block the highway and not permit unauthorized travel. In the event of multiple agency involvement, the Oklahoma Highway Patrol will coordinate the various police and sheriff departments.

In case of minor fires, facility personnel will usually respond to extinguish or contain the fire. If a major fire occurs, local fire departments will be notified. The local fire departments will be responsible for the prevention and spread of the fire outside the facility. If more than one fire department arrives on site, the fire department from Guthrie will be the primary fire authority.

The Logan County Hospital can handle routine injuries (e.g. cuts, minor burns, etc.) however, transfer via Medi-vac units from Oklahoma City or other suitable means will be used if necessary.

All agencies will coordinate through the Environmental Management, Inc. Emergency Coordinator for questions, direction, and to obtain other information relevant to the emergency.

8.4 Contingency Plan Implementation Acceptance Statement

The Environmental Management, Inc. Contingency Plan is designed to assist the company's local emergency agencies in dealing with an emergency situation at the Environmental Management facility. These emergencies deal with all types of situations including but not limited to; fires, explosions, and releases of hazardous materials into the air, soil or surface water. Environmental Management will designate a list of authorized Emergency Coordinator's. It will be the responsibility of the Emergency Coordinator to deal with local agencies regarding the exchange of vital information. Local agencies providing assistance in an emergency should obtain all relevant information from the Emergency Coordinator and direct any questions, concerns etc. to him or her directly.

This Contingency Plan has been designed for Environmental Management, Inc. by Environmental Management, Inc. to be used in case of emergencies.

I hereby receive this copy of the Environmental Management Contingency Plan and will provide the needed services applicable to implement my portion of operations to ensure a successful plan.

Date	Signature of person receiving the plan
	Title
Date	Signature of Environmental Management Representative
	Title

8.5 *Distribution of the Contingency Plan Manual*

1. Environmental Management, Inc. Main File Library
   5200 NE Highway 33
   Guthrie, OK 73044
   (405) 282-8510

2. Guthrie Fire Department

3. Logan County Sheriff's Office

4. Logan County Office of Emergency Management

5. Logan County Hospital

6. Edmond Fire Department

8.4 Contingency Plan Implementation Acceptance Statement

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4/24/13
Date

Signature of person receiving the plan

BATT. CHIEF GUTHRIE FD
Title

4/24/13
Date

Signature of Environmental Management Representative

ER COORDINATOR
Title

8.4 Contingency Plan Implementation Acceptance Statement

The Environmental Management, Inc. Contingency Plan is designed to assist the company's local emergency agencies in dealing with an emergency situation at the Environmental Management facility. These emergencies deal with all types of situations including but not limited to; fires, explosions, and releases of hazardous materials into the air, soil or surface water. Environmental Management will designate a list of authorized Emergency Coordinator's. It will be the responsibility of the Emergency Coordinator to deal with local agencies regarding the exchange of vital information. Local agencies providing assistance in an emergency should obtain all relevant information from the Emergency Coordinator and direct any questions, concerns etc. to him or her directly.

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4/24/13
Date

Cheryl Downs
Signature of person receiving the plan

Admin. Assist. MERCY HOSPITAL
Title

4/24/13
Date

Signature of Environmental Management Representative

ER COORDINATOR
Title

8.4 Contingency Plan Implementation Acceptance Statement

The Environmental Management, Inc. Contingency Plan is designed to assist the company's local emergency agencies in dealing with an emergency situation at the Environmental Management facility. These emergencies deal with all types of situations including but not limited to; fires, explosions, and releases of hazardous materials into the air, soil or surface water. Environmental Management will designate a list of authorized Emergency Coordinator's. It will be the responsibility of the Emergency Coordinator to deal with local agencies regarding the exchange of vital information. Local agencies providing assistance in an emergency should obtain all relevant information from the Emergency Coordinator and direct any questions, concerns etc. to him or her directly.

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I hereby receive this copy of the Environmental Management Contingency Plan and will provide the needed services applicable to implement my portion of operations to ensure a successful plan.

4/24/13
Date

Cynthia Russell
Signature of person receiving the plan

on behalf of David Ball LOGAN COUNTY OEM
Title

4/24/13
Date

Paul P. [illegible]
Signature of Environmental Management Representative

ER COORDINATOR
Title

8.4 Contingency Plan Implementation Acceptance Statement

The Environmental Management, Inc. Contingency Plan is designed to assist the company's local emergency agencies in dealing with an emergency situation at the Environmental Management facility. These emergencies deal with all types of situations including but not limited to; fires, explosions, and releases of hazardous materials into the air, soil or surface water. Environmental Management will designate a list of authorized Emergency Coordinator's. It will be the responsibility of the Emergency Coordinator to deal with local agencies regarding the exchange of vital information. Local agencies providing assistance in an emergency should obtain all relevant information from the Emergency Coordinator and direct any questions, concerns etc. to him or her directly.

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I hereby receive this copy of the Environmental Management Contingency Plan and will provide the needed services applicable to implement my portion of operations to ensure a successful plan.

4/24/13
Date

Signature of person receiving the plan

Dispatch Guthrie PD
Title

4/24/13
Date

Signature of Environmental Management Representative

ER Coordinator
Title

8.4 Contingency Plan Implementation Acceptance Statement

The Environmental Management, Inc. Contingency Plan is designed to assist the company's local emergency agencies in dealing with an emergency situation at the Environmental Management facility. These emergencies deal with all types of situations including but not limited to; fires, explosions, and releases of hazardous materials into the air, soil or surface water. Environmental Management will designate a list of authorized Emergency Coordinator's. It will be the responsibility of the Emergency Coordinator to deal with local agencies regarding the exchange of vital information. Local agencies providing assistance in an emergency should obtain all relevant information from the Emergency Coordinator and direct any questions, concerns etc. to him or her directly.

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I hereby receive this copy of the Environmental Management Contingency Plan and will provide the needed services applicable to implement my portion of operations to ensure a successful plan.

4/24/13
Date

Signature of person receiving the plan 207

Lieutenant Investigations
Title LOGAN COUNTY SHERIFF

4/24/13
Date

Signature of Environmental Management Representative

ER COORDINATOR
Title

8.4 Contingency Plan Implementation Acceptance Statement

The Environmental Management, Inc. Contingency Plan is designed to assist the company's local emergency agencies in dealing with an emergency situation at the Environmental Management facility. These emergencies deal with all types of situations including but not limited to; fires, explosions, and releases of hazardous materials into the air, soil or surface water. Environmental Management will designate a list of authorized Emergency Coordinator's. It will be the responsibility of the Emergency Coordinator to deal with local agencies regarding the exchange of vital information. Local agencies providing assistance in an emergency should obtain all relevant information from the Emergency Coordinator and direct any questions, concerns etc. to him or her directly.

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I hereby receive this copy of the Environmental Management Contingency Plan and will provide the needed services applicable to implement my portion of operations to ensure a successful plan.

4/24/13
Date

Nancy Lazzaro
Signature of person receiving the plan

Admin Assist EDMONDFD
Title

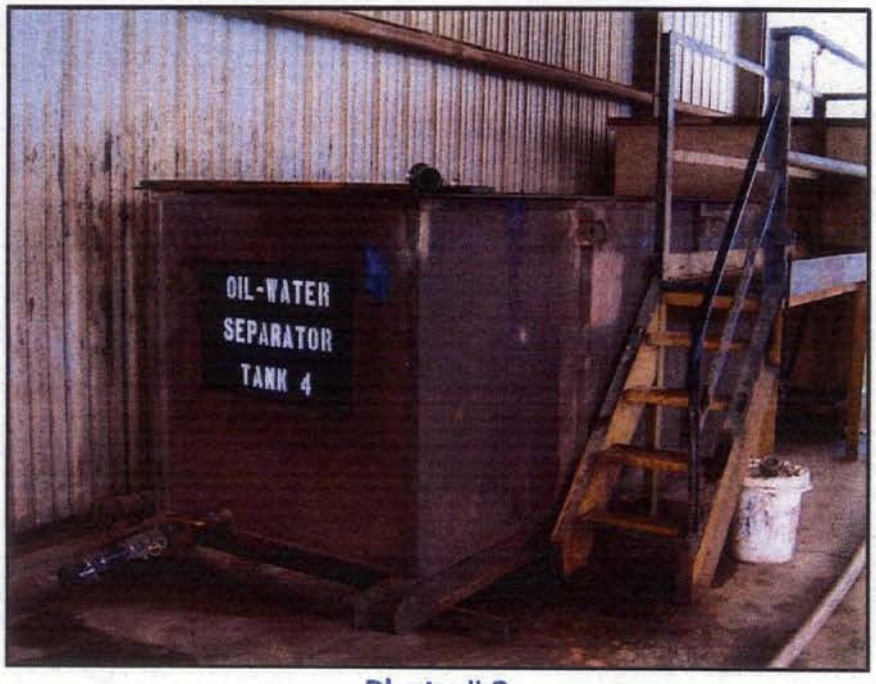
4/24/13
Date

Signature of Environmental Management Representative

ER COORDINATOR
Title

PHOTOGRAPHS

Photo # 1



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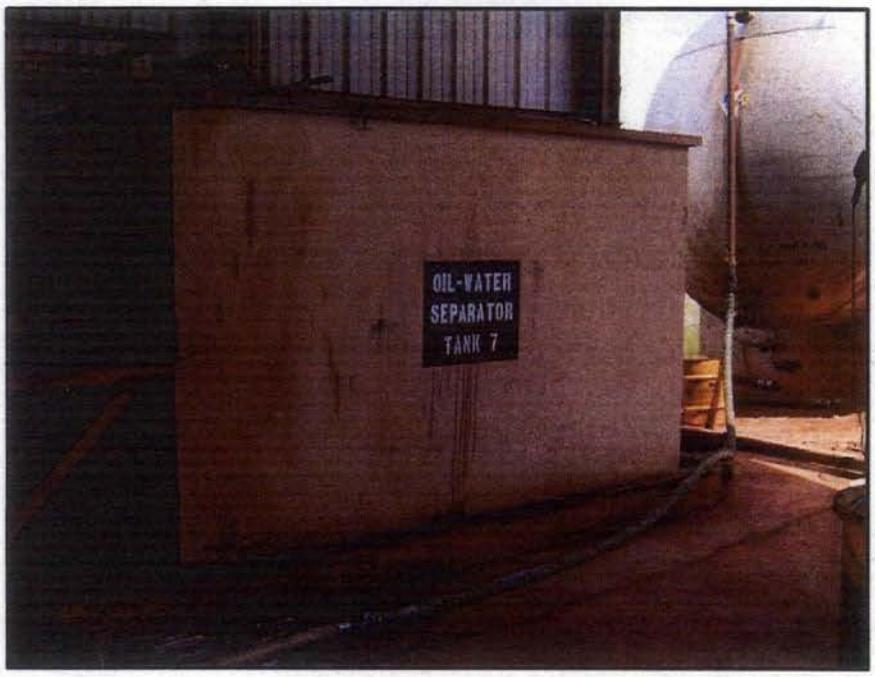
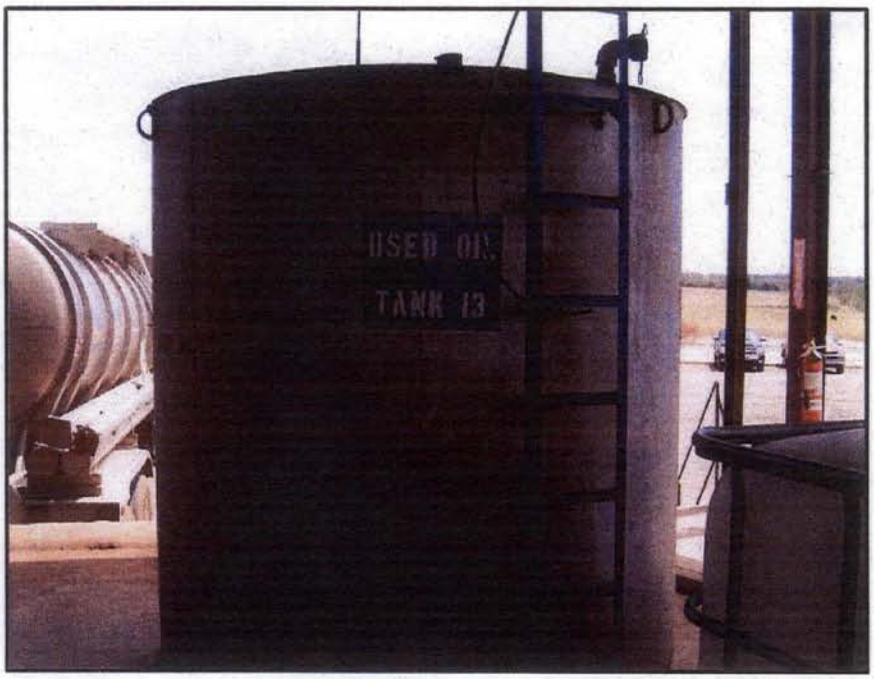


Photo # 3

Photo # 4



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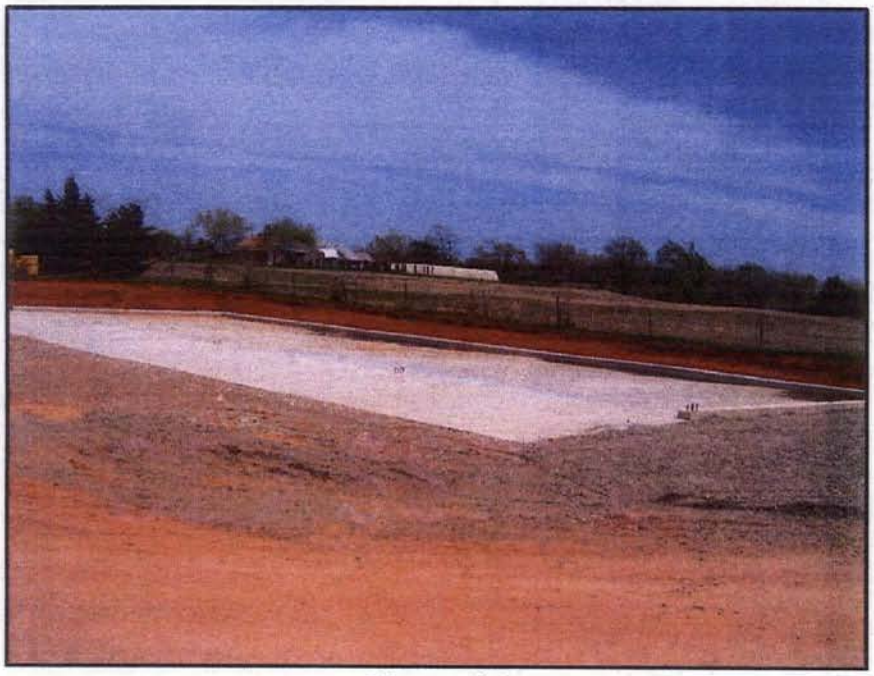

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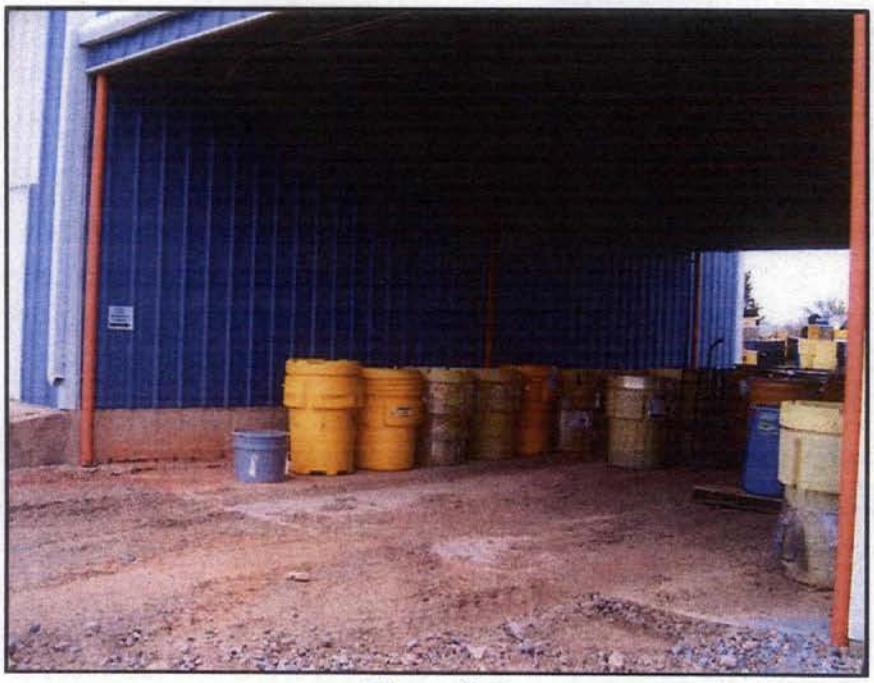

Photo # 7

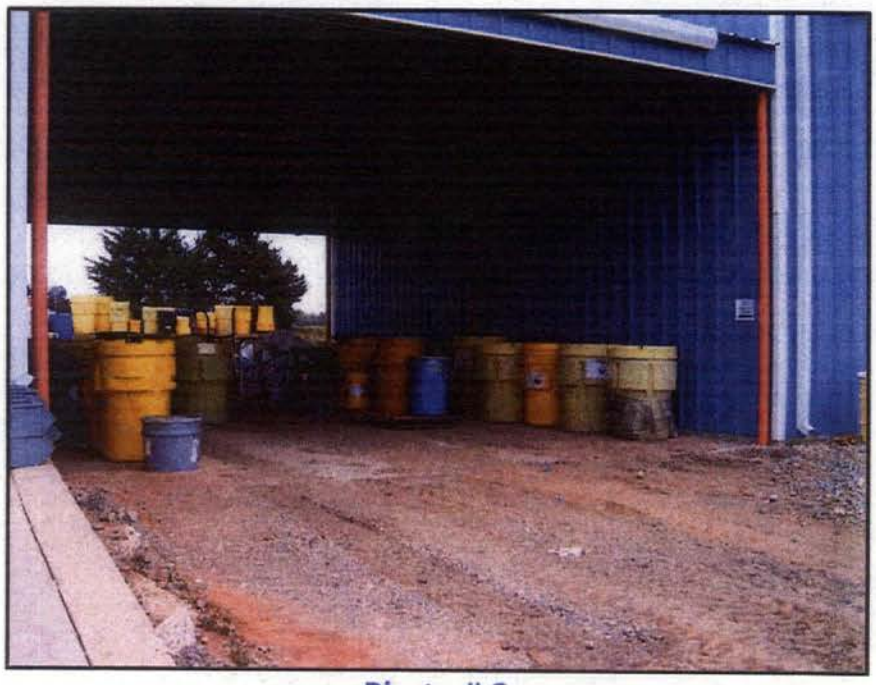

Photo # 8

ATTACHMENT 19

- OKLAHOMA LANDFILL GROUNDWATER DATA

Oklahoma Landfill Groundwater Data

Permit Number	Landfill	County	Depth to Groundwater below waste	GW Flow Rate	Type of Aquifer Material
3501001	Cherokee Nation	Adair	70 - 100 feet	.9 feet/year	shale
3505009	Elk City	Beckham	15 - 50 feet	3.3 feet/year	sandy clay
3505011	Sayre	Beckham	20-30 feet	2.8 feet/year	shale/clay with sand stringers
3509005	CCSWDA	Canadian	5+ feet	114 feet/year	sand
3510007	SORD	Carter	10 + feet	2.65 feet/year	clay/shale
3516015	Lawton	Comanche	120 feet	10-15 feet/year	sandstone
3516018	Ft.Sill	Comanche	10 -15 feet	6 feet/year	sandy shale
3524006	Enid	Garfield	5 feet +	62 feet/year	sand
3525012	Foster Waste Disposal	Garvin	Info. not available	Info. not available	Info. not available
3526013	Southern Plains LF	Grady	5 feet +	5 feet/year	siltstone and clay
3526014	Great Plains Landfill	Grady	8 feet	5 feet/year	shale
3536014	Ponca City-Vashi Four Eyes	Kay	20 -25 feet	9 feet/year	silt
3539004	Wilburton	Latimer	info. Not available	Info. Not available	info. Not available
3541013	AMD City of Prague	Lincoln	5 feet +	2 feet/year	silty shale
3547002	Red Carpet Landfill	Major	5 feet +	6 feet/year	clay and silty shale
3544014	Pinecrest LF	McClain	5 feet +	19 feet/year	sand
3545008	City of Broken Bow	McCurtain	15 - 20 feet	3 -5 feet/year	shale
3552011	Northern Oklahoma Disp.	Noble	5 feet +	6 feet/year	silty shale
3555018	OKC Council Rd. LF	Oklahoma	15 - 10 feet	30.37 feet/year	sand
3555028	SE OKC LF	Oklahoma	15 - 20 feet	2.3 feet/year	shale and sandstone
3555036	East Oak LF	Oklahoma	5 feet +	88 feet/year	sandy alluvial terrace
3556008	Elliot Const. LF	Okmulgeee	5 feet +	12 feet/year	95%spoil - shale and sand
3557021	Shell Creek	Osage	5 feet +	121 feet/year	clayey sand and sand
3557025	Osage LF	Osage	5 feet +	216 feet/year	silty clay
3560010	HEW Waste System	Payne	5 -10 feet	6 feet/year	silty clay
3561012	McAlester City LF	Pittsburg	5 feet +	6 feet/year	grey / blue clay
3561013	Pittsburgh Cty. LF	Pittsburg	5 feet +	4 feet/year	silty clay and shale
3562006	Ada Municipal LF	Pontotoc	5-10 feet	7.44 feet/year	sandy clay

3563005	Absolute Waste Systems	Pottawatomie	5 feet +	17 feet/year	interbedded shale and sand
3563004	Canadian Valley LF	Pottawatomie	5 feet +	20 feet/year	riverbottom silts
3564004	Clinton Lewis LF	Pushmataha	10 - 40 feet	99 feet/year	sand
3567020	Sooner Land Management	Seminole	5 feet +	263 feet/year	sandy clay - sand (water acquifer)
3568008	Sallisaw LF	Sequoyah	5 feet +	14 feet/year	silty shale and hard sand
3572001	North Tulsa LF	Tulsa	10 feet +/-	3.4 - .034 feet/year	sandy clay/clayey sand
3572042	Quarry LF	Tulsa	40 +/- feet	1.88 feet/year	shale
3573021	51B Porter LF	Wagoner	5 - 10 feet	5.3 feet/year	clay and shale
3573016	Broken Arrow LF	Wagoner	10 - 20 feet	5.95 feet/year	mining backfill - shales
3577001	NWOKSDA	Woodward	7 feet +	12 feet/year	silty and sandy clay

ATTACHMENT 20

NO ADVERSE IMPACT LETTERS

- SCENIC RIVERS
- RECREATION/PRESERVATION AREAS
- ENDANGERED & THREATENED SPECIES
- 100-YEAR FLOOD PLAIN
- PUBLIC WATER SUPPLY
- WELLHEAD PROTECTION AREA
- WETLANDS
- GUTHRIE AIRPORT

ED FITE
ADMINISTRATOR

FRANK KEATING
GOVERNOR

STATE OF OKLAHOMA
OKLAHOMA SCENIC RIVERS COMMISSION

February 1, 1996

Larry Dunn
Compliance Officer
Environmental Management, Inc.
P.O. Box 3940
Edmond, OK 73083-3940

Dear Mr. Dunn:

This letter is to certify that the proposed Type VIII Transfer Station Plan for an existing facility located approximately 2 miles east of I-35 on Highway #33, in Logan County, Oklahoma, will have no adverse impact on any of Oklahoma's "Scenic River Areas." Additionally, there are no "Scenic River Areas" within one mile of Logan County, Oklahoma.

In closing, the Oklahoma Scenic Rivers Commission would like to thank you for soliciting our comments on this project. Feel free to contact us if we can further assist you and/or your office.

Sincerely,

Ed Fite, III
Administrator

EHF/rkt

P.O. BOX 292 TAHLEQUAH, OK 74465-0292

recycled paper

JANE JAYROE
CABINET SECRETARY
EXECUTIVE DIRECTOR

OKLAHOMA
NATIVE AMERICA

FRANK KEATING
GOVERNOR

April 26, 2000

Robert A. Rabatine
Environmental Management, Inc.
Post Office Box 700
Guthrie, OK 73044-0700

RE: Transfer Station Facility—Guthrie, Oklahoma

Dear Mr. Rabatine:

We have reviewed the site of the proposed transfer station along Highway 33 and find that there are no state or local recreation areas located within one-half mile of the facility. I have attached a list of the Guthrie federally funded parks of which we have knowledge for your information.

Thank you for the opportunity to review this project. If further information is necessary, feel free to call me at 405-521-6891. I can also be reached via fax at 405-522-5356.

Sincerely,

Kristina S. Marek, Director
Division of Planning and Development
Alternate State Liaison Officer

cc: Mary Porter, Administrative Assistant

TOURISM AND RECREATION DEPARTMENT
15 N. ROBINSON, SUITE 100 OKLAHOMA CITY, OKLAHOMA 73102 405-521-2413

RECYCLED PAPER

WILDLIFE CONSERVATION COMMISSION

DON RITTER, CHAIRMAN
-ARLAND STONECIPHER, VICE CHAIRMAN
MARK PATTON, SECRETARY
ED ABEL, MEMBER
JOHN S. "JACK" ZINK, MEMBER
JOHN D. GROENDYKE, MEMBER
WILLIAM CRAWFORD, MEMBER
VYRL KEETER, MEMBER

OKLAHOMA

FRANK KEATING, GOVERNOR
GREG D. DUFFY, DIRECTOR

DEPARTMENT OF WILDLIFE CONSERVATION

1801 N. Lincoln P.O. Box 53465 Oklahoma City, OK 73152 PH. 521-385

February 2, 1996

Mr. Larry L Dunn
Environmental Management, Inc.
P.O. Box 3940
Edmond, OK 73083-3940

Subject: Permit for Solid Waste Transfer Station

Dear Mr. Dunn:

This responds to your letter of January 29, 1996 requesting information on endangered and threatened wildlife species with regard to the following:

Project: Permit for Solid Waste Transfer Station

Location: NE/4 Section 1, T16N, R2W, Logan County

We have reviewed the information sent to this office regarding the proposed project location and our current records of endangered and threatened species. Based on this review, it does not appear that the project site is likely to provide suitable habitat for any state-listed endangered or threatened wildlife species.

Please understand that due to time and personnel constraints, this Department has not conducted a field survey of the specific project site. Also, this response does not address the potential impact this project may have on wildlife species other than those listed as endangered or threatened by the state of Oklahoma. Depending upon the placement and construction of this facility, there may be water quality impacts to Pin Creek which is located in the same section as the facility.

For additional information on sensitive species, we recommend that you contact the Oklahoma Natural Heritage Inventory, 111 E. Chesapeake Street, Norman, Oklahoma 73019. For information on

An Equal Opportunity Employer

federally listed threatened or endangered species, contact the U.S. Fish and Wildlife Service, Ecological Services, 222 South Houston, Suite A. Tulsa, OK 74127.

We appreciate the opportunity to comment on this project. If we can be of further assistance, please contact our Natural Resources Section at 405/521-4616.

Sincerely,

Mark D. Howery

Mark D. Howery
Natural Resources Biologist

Oklahoma Biological Survey

Oklahoma
Natural Heritage Inventory

OKLAHOMA BIOLOGICAL SURVEY
111 E. Chesapeake Street
Norman, Oklahoma 73019-0575. USA
(405) 325-1985
FAX: (405) 325-7702

February 2, 1996

Larry Dunn
Environmental Management, Inc.
P.O. Box 3940
Edmond, OK 73083-3940

Dear Mr. Dunn:

This letter is in response to your request for information on possible endangered species or other elements of biological significance at the following sites:

T16N-R2W-Section 1
Logan County

The Oklahoma Natural Heritage Inventory maintains a database on the status and location of rare species and significant ecological communities in Oklahoma. We have reviewed the information currently in the Heritage Inventory database and found no record of on site-elements. These are listed on the attached table.

The Heritage Inventory database is the most current comprehensive one available on the rare biota of Oklahoma. However, such a database is only as complete as the information that has been collected. For this reason, we cannot state for certain whether or not a given site harbors rare species or significant communities. We suggest you also contact the Environmental Division of the Oklahoma Department of Wildlife Conservation, as they may have site specific information of which we are unaware.

Thank you for the opportunity to respond to your request.

Sincerely,

Beth A. Stackpole
Research Specialist

F:\WP61\LD\TYPE8.LD

Stella Steele

From: David Ball <loganoem@gmail.com>
Sent: Thursday, March 01, 2018 8:48 AM
To: Stella Steele
Subject: Flood Map

Hi Stella,
As of today February 16th, 2018 according to the FEMA flood map dated September 29th, 2010 EMI located at 5200 NE Hwy 33 is NOT located in the FEMA floodplain.
If you have any other questions please let me know.
Thanks
David Ball

MASON MUNGLE
EXECUTIVE DIRECTOR

BEN POLLARD
ASSISTANT DIRECTOR

STATE OF OKLAHOMA
OKLAHOMA CONSERVATION COMMISSION

February 5, 1996

Larry L. Dunn, Compliance Officer
Environmental Management, Inc.
P.O. Box 3940
Edmond, OK 73083-3940

Dear Mr. Dunn:

Your request for a wetland determination for the Type VIII Transfer Station Plan described in your letter of January 29, 1996, has been reviewed. Based on the federal wetlands determination criteria there are no wetlands in the area described.

If you have any further questions or concerns, please contact me at 405/521-2384.

Sincerely,

DERRIL PUTMAN
Wetlands Program Specialist

DP/di
c: Mason Mungle, Executive Director
Dan Sebert, District Operations Director
U.S. Army Corps of Engineers

F:\WP61\LD\TYPE8.LD
2800 NORTH LINCOLN BOULEVARD, SUITE 160 • OKLAHOMA CITY, OKLAHOMA 73105-4210 • (405) 521-2384 • FAX (405) 521-6886

recycled paper

Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

March 27, 2000

Robert A. Rabatine
Environmental Management Inc.
PO Box 700
Guthrie, OK 73044-0700

Re: E.M.I. application for a Transfer Station Development and Operations Plan for an existing facility.
Legal Description: Part of NE ¼ Section 1 T16N R2W, Logan County, Oklahoma.

Dear Mr. Rabatine:

The above referenced project has been reviewed by the Community Assistance Program staff of this agency to identify potential areas that may contain prehistoric or historic archaeological materials (historic properties). The location of your project has been cross-checked with the state site files containing approximately 14,000 archaeological sites that are currently recorded for the state of Oklahoma. No sites are listed as occurring within your project area, and based on the topographic and hydrologic setting, no archaeological materials are likely to be encountered. Thus an archaeological field inspection is not considered necessary. However, should construction activities expose buried archaeological materials such as chipped stone tools, pottery, bone, historic crockery, glass, metal items or building materials, this agency should be contacted immediately at (405)325-7211. A member of our staff will be sent to evaluate the significance of these remains.

This environmental review and evaluation is performed in order to locate, record, and preserve Oklahoma's prehistoric and historic cultural heritage in cooperation with the State Historic Preservation Office, Oklahoma Historical Society. In addition to our review comments, under 36CFR Part 800.3 you are reminded of your responsibility to consult with the appropriate Native American tribe/groups to identify any concerns they may have pertaining to this undertaking and potential impacts to properties of traditional and/or ceremonial concerns. Thank you.

Sincerely,

Rhonda Fair
Staff Archeologist

Robert L. Brooks
State Archeologist

:lw

cc: SHPO

RECEIVED

MAR 3 0 2000

Per.....

111 E. Chesapeake, Room 102, Norman, Oklahoma 73019-5111 PHONE: (405) 325-7211 FAX: (405) 325-7604
A UNIT OF ARTS AND SCIENCES SERVING THE PEOPLE OF OKLAHOMA

Environmental Management, Inc.

"For an environment we can all live with today & tomorrow."

March 17, 2000

Airport Manager
Guthrie Municipal Airport
520 Airport Road
Guthrie, OK 73044-0700

Environmental Management, Inc. (E.M.I.) is in the process of applying for a Transfer Station Development and Operations Plan for an existing facility from the Oklahoma Department of Environment Quality (ODEQ). As a part of the application E.M.I. is required to determine its proximity to any airport and assess its potential to create a bird hazard to aircraft.

E.M.I. manages containerized industrial wastes at our Guthrie facility that is approximately four miles from the Guthrie Municipal Airport. Our activities do not create a bird hazard, but since we are located within a five-mile radius of any airport runway used by turbojet or piston-type aircraft we must notify the affected airport and the Federal Aviation Administration to be in compliance with ODEQ regulations.

The location of our facility is as follows:

Physical Location 2.5 miles east of I-35 on Highway 33

Legal Description A Part of the Northeast Quarter of Section 1, Township 16 North, Range 2 West described as follows:
Beginning at the Southwest corner of the Northeast quarter of Section 1, thence North 826 feet for place of beginning, thence East 653 feet to the West right-of-way line of S.H. # 33, thence following the West right-of-way line of said Highway in a Northeasterly direction 996.8 feet to a point, thence West 434 feet, thence North 942 feet to the North line of the Northeast Quarter of Section 1, Township 16 North, Range 2 West, thence West 816 feet to the Northwest corner of the Northeast Quarter of Section 1, thence South to place of beginning, containing 30 acres, more or less.

Below is a copy of the Department of Environmental Quality Regulation 252:520-7-2(d) which requires this notification.

> *(d) Airports. Owners or operators of new disposal sites, existing disposal sites, and lateral expansions that are located within 10,000 feet (3,048 meters) of any airport runway used by turbojet aircraft or within 5,000 feet (1,524 meters) of any airport runway used by only piston-type aircraft shall demonstrate that the disposal sites are designed and operated so that the disposal site does not pose a bird hazard to aircraft. No disposal site that has the potential to cause or create bird hazards to aircraft shall be permitted within 5,000 feet (1,524 meters) of any airport runway used only by piston-engine aircraft, or within 10,000 feet (3,048 meters) of any airport runway used by turbojet aircraft, except as may be approved by the U.S. Federal Aviation Administration. Owners or operators proposing to site new disposal sites and lateral expansions located within a five-mile radius of any airport runway used by turbojet or piston-type aircraft must notify the affected airport and the Federal Aviation administration (FAA).*

If you have any questions regarding this matter please call me at (405) 282-8510.

Sincerely

Robert A. Rabatine
Regulatory Affairs
Environmental Management, Inc.

E.M.I. — Post Office Box 700
Guthrie OK 73044-0700
(405) 282-8510

U.S. Department
of Transportation
**Federal Aviation
Administration**

Southwest Region
Arkansas, Louisiana,
New Mexico, Oklahoma,
Texas

Fort Worth, Texas 76193-0000

March 29, 2000

Mr. Robert A. Rabatine
Regulatory Affairs
Environmental Management, Inc.
P.O. Box 700
Guthrie, OK 73044-0700

Dear Mr. Rabatine:

We have reviewed the proposed Transfer Station located about 3.5 miles northeast of the Guthrie Municipal Airport in Guthrie, Oklahoma, as described in your March 17, 2000 letter. We have no objection to the proposal.

This site has been assigned our File No. 20-0040K. Please refer to this number in any future correspondence regarding this site. Thank you for coordinating it with us.

Sincerely,

Joseph G. Washington
Manager, Safety and Standards Branch

RECEIVED
MAR 31 2000
Per.....

ATTACHMENT 21

- EMI LIABILITY INSURANCE CERTIFICATE

ENVIRON-01 MANDERSON

ACORD

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 04/04/2017

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

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

PRODUCER
Laird & Walkingstick Insurance
1010 Manvel Avenue
Chandler, OK 74834

CONTACT NAME: Mary Anderson
PHONE (A/C, No, Ext): (405) 258-4284 FAX (A/C, No): (405) 240-5587
E-MAIL ADDRESS: marya@lw-ins.com

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A : Homeland Insurance Company of New York	34452
INSURER B : Atlantic Specialty Insurance Company	27154
INSURER C : CompSource Mutual Insurance Company	36188
INSURER D : Navigators Specialty Insurance Company	36056
INSURER E :	
INSURER F :	

INSURED
Environmental Management Inc
5200 NW Hwy 33
Guthrie, OK 73044

COVERAGES CERTIFICATE NUMBER: REVISION NUMBER:

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

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	COMMERCIAL GENERAL LIABILITY CLAIMS-MADE [X] OCCUR [X] Owner's & Contractor GEN'L AGGREGATE LIMIT APPLIES PER: POLICY [X] PRO-JECT [ ] LOC OTHER: Various - see OBENVGL 001 01 1			7930044250001	04/01/2017	04/01/2018	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG POLLUTION	$ 1,000,000 $ 50,000 $ 5,000 $ 1,000,000 $ 2,000,000 $ 2,000,000 $ 1,000,000
B	AUTOMOBILE LIABILITY [X] ANY AUTO OWNED AUTOS ONLY / SCHEDULED AUTOS HIRED AUTOS ONLY / NON-OWNED AUTOS ONLY			7930044260001	04/01/2017	04/01/2018	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident) MCS-90 Included	$ 1,000,000 $ $ $ $
A	[X] UMBRELLA LIAB [X] OCCUR EXCESS LIAB CLAIMS-MADE DED RETENTION $			7930044270001	04/01/2017	04/01/2018	EACH OCCURRENCE AGGREGATE MCS-90 Included	$ 5,000,000 $ 5,000,000 $
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) Y/N [ ] If yes, describe under DESCRIPTION OF OPERATIONS below	N/A		03111060171	04/01/2017	04/01/2018	[X] PER STATUTE [ ] OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	$ 1,000,000 $ 1,000,000 $ 1,000,000
D	Equipment Floater			NY17TLM0BA0IT03	04/01/2017	04/01/2018	Leased/Rented	100,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
Full Service Environmental Management
certificate supersedes any prior cert

CERTIFICATE HOLDER

Environmental Management Inc
5200 NE Hwy 33
Guthrie, OK 73044-0700

CANCELLATION

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

AUTHORIZED REPRESENTATIVE
Jill T. Watts

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ATTACHMENT 22

- WASTE EXCLUSION PLAN

Waste Exclusion Plan

For The

Environmental Management, Inc. Transfer Station Facility

Guthrie, Oklahoma

March 14, 2018

Environmental Management, Inc.
P.O. Box 700
5200 Northeast Highway 33
Guthrie, OK 73044
(405) 282-8510

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Revision Log

Revision No.	Effective Date	Prepared By	Description of Revisions	Affected Pages
Rev. 0	3/14/2018	EMI	N/A	N/A

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Attachment 1 – Driver's Checklist

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1.0 INTRODUCTION

EMI began providing waste and materials management services to the business community in 1983. With the construction of the Guthrie, Oklahoma, Transfer Station Facility in 1988, EMI was able to expand its waste management services to include waste transport, in conjunction with consolidating waste from various generators, to ensure compliant management at Federally- and State-permitted off-site waste disposal and recycling facilities. EMI's motto *"Environmental Management, for an environment we can both live with today & tomorrow,"* succinctly describes the corporate mission and the end objective to which its staff works toward on a daily basis. EMI provides a valuable service to the business sector, and in turn to the people of Oklahoma. People who depend on industry to promote economic growth, but with the expectation that it does so in a manner that preserves the quality of the existing natural resources within the State.
EMI provides waste and materials management services to assist the regional commercial/industrial business community in its efforts to operate within the bounds of Federally- and state-mandated regulatory rules and laws. EMI provides its customers with waste management services, including waste profiling, packaging, labeling, as well as transportation of wastes or materials to a permitted waste disposal site or recycling facility. As a permitted Transfer Station Facility, EMI handles RCRA-regulated Hazardous Wastes, Nonhazardous Solid Wastes, Nonhazardous Industrial Wastes (NHIW), Recyclables, Used Oil, Treated Medical Waste, Universal Waste and Asbestos-containing Materials. No wastes or materials are disposed of at the EMI site, rather all materials received at the EMI Transfer Station Facility are temporarily staged and then transported off-site to a permitted waste disposal site or material recycling facility.

Environmental Management, Inc. is a 10-day Transfer Station with a DEQ-approved Development and Operations Plan in accordance with Oklahoma Administrative Code 252:205-15-1. The Transfer Station Facility is physically located 2.5 miles east of I-35 on Hwy 33. EMI has owned and operated the Transfer Station Facility at its current location since 1988.

The company's services include emergency response, site remediation, and accepting hazardous and solid wastes for processing/consolidation, and then compiling data/paperwork necessary to arrange for compliant transport of these wastes to final disposal/recycling facilities. All waste received at the EMI Transfer Station Facility is shipped off-site to an appropriate disposal facility. When handling hazardous wastes from Large and Small Quantity Generators, EMI may store these wastes temporarily (less than 10 days) at its Facility. In addition the company receives Hazardous Wastes from Very Small Quantity Generators for the purposes of consolidation and/or processing, as well as arranging for compliant transport/disposal. EMI is also a multipurpose hazardous material brokerage and service company, which receives various excess chemical products from outside vendors, and gives them a second chance at being utilized for their intended purpose, via the EMI Product Distribution program.

A Map illustrating the location of the EMI Facility is presented as Figure 1

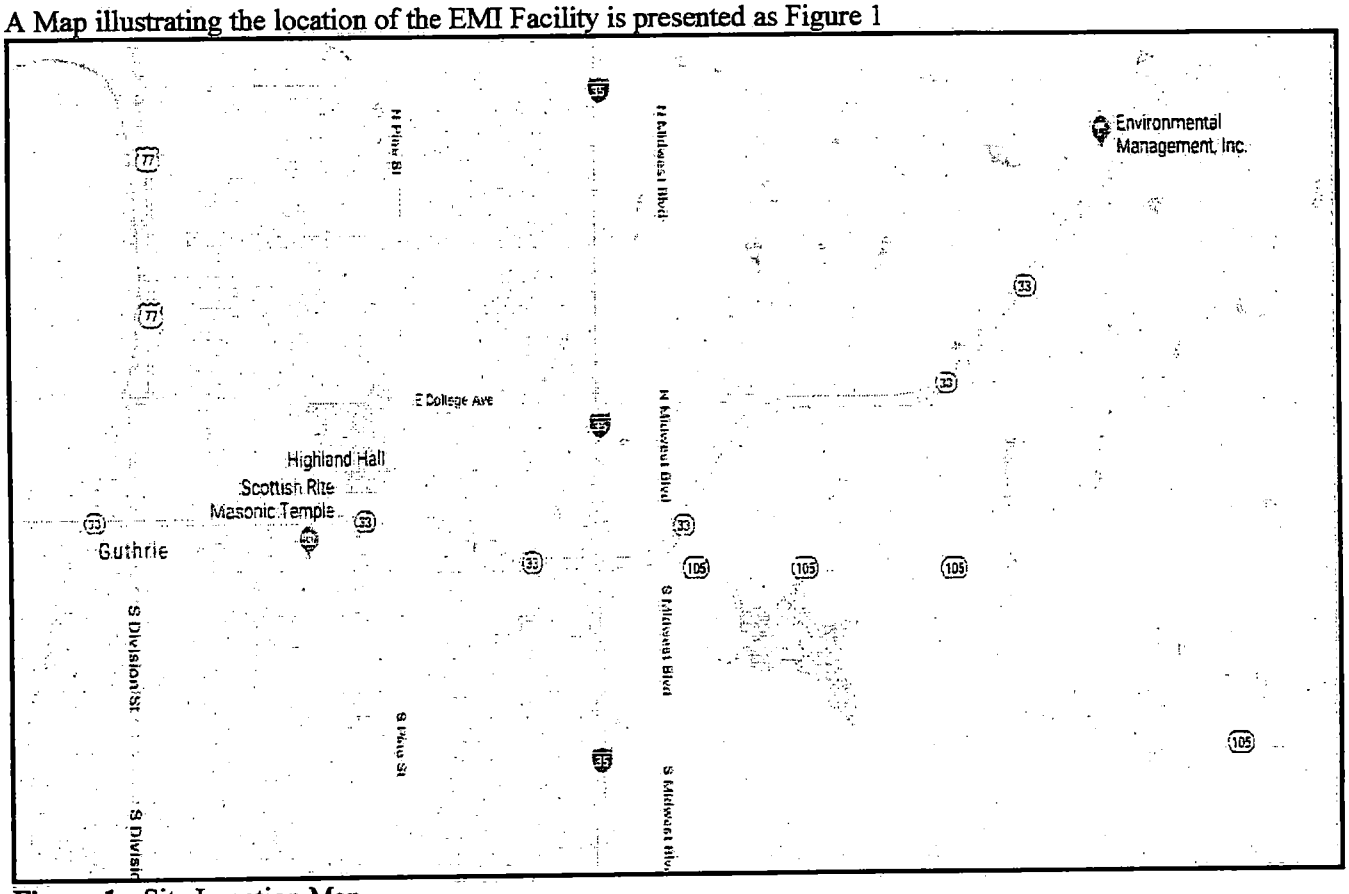

Figure 1: Site Location Map.

2.0 PURPOSE & NEED

The Oklahoma Department of Environmental Quality (ODEQ) previously provided authorization for the operation of EMI's Transfer Station located in Guthrie, Oklahoma, per approval No. 982293334-TS. The purpose of this document is to fulfill the requirement for a Waste Exclusion Plan (WEP) per OAC 252:515-29 Exclusion of Prohibited Wastes. The implementation of the WEP at the EMI Transfer Station Facility is to detect and prevent the processing of excluded materials, per EMI's ODEQ-approved Development and Operations Plan. When conditions of the ODEQ-approved WEP change, an amended WEP will be submitted within 30 days by EMI to ODEQ for approval.
This document will address all WEP requirements, as cited in OAC 252:515-29-3 WEP Requirements.

3.0 EXCLUDED WASTES

The Environmental Management, Inc., transfer station will not process the following materials:

- Radioactive Mixed Hazardous Waste
- Untreated Medical Waste (per OAC 252:515-1-2)
- Explosives
- Used Tires
- Household Garbage (unless incidental to C&D debris)
- DEA Controlled Substances

4.0 TRAINING

All EMI facility operating personnel shall be provided with an initial eight (8) hours of basic orientation training covering the applicable subject matters in the EMI Acceptance Policy and the Development and Operations Plan. The training will be conducted by EMI personnel.

4.1 Training Curriculum

The training curriculum shall include regulatory definitions and requirements for the receipt and handling of materials by EMI staff, as applicable to site-specific operations. During the training all elements of the WEP will be reviewed. At a minimum the training will cover the following:

- Purpose and Need for the Facility WEP
- Review of regulatory definitions and requirements for the receipt of EMI materials / waste
- EMI Facility's Acceptance Policy, including the definitions of excluded waste
- Inspection of materials; and
- Excluded waste identification and notification procedures

The training shall also include:

- Waste Evaluation and Approval Process
- Waste Shipment Notification and Manifest Tracking
- Delivery, Handling and Processing Procedures
- Documentation and Recordkeeping

Participants will complete a short written exam to demonstrate knowledge of the WEP policy and processes.

4.2 Training Documentation

Training records are maintained for each employee meeting the definition of EMI personnel. Each record includes the job title of the employee, a description detailing the required skill, education, other qualifications and duties related to that job title and the amount of both introductory and continuing training that will be given to that employee. The file also contains documentation of the training completed and/or job experience.

Employee training will be documented via the attendee sign-in sheet, as well as the participant training exams. Training records on current personnel will be kept until closure of the facility. Training records on former employees will be kept for at least three years from the date the employee last worked at the facility.

4.3 Refresher Training

Refresher training will be conducted for a minimum of four (4) hours per year. The refresher training will include a summarization of the curriculum stated above in section 4.1, and will include a review of any changes made to the EMI WEP policies during the previous year. Documentation of the refresher training will be conducted and maintained, as specified in Section 4.2. When personnel miss a refresher course (e.g. due to illness, vacation), they may review that topic with their supervisor, the Training Coordinator or other qualified individuals. Such reviews are documented in the individual personnel training records.

5.0 ACCEPTANCE POLICY

EMI is aware of how important it is to properly characterize and manage both solid and hazardous materials. EMI long ago recognized the need to develop a comprehensive materials tracking and management system and has invested a great deal of resources to develop an approach that in many respects rivals the largest full-service TSD operations in the nation. To help insure the EMI staffs' successful management of materials at the EMI facility, an electronic Waste and Materials Information Management System has been developed. This system enables the company to retain complete control over the material and its place in the waste disposal and materials handling process.

EMI is both a waste management company and a transportation company, and in most cases is the primary transporter of waste both from the customer's site to EMI, and from EMI to the final waste disposal site. The Project Coordinators make the initial contact with the customer, working closely with them to ensure the material is properly characterized. The characterization is based on process knowledge, available Safety Data Sheets (SDS), or on analysis of the material. In EMI's experience, customers usually have sufficient knowledge to properly characterize their materials. However, when that is not the case, EMI assists them by offering access to third-party laboratories as part of its service. Packaging and labeling is also provided by EMI upon customer request. As a registered

hazardous waste and hazardous materials transporter, EMI has the knowledge and experience to assist customers in compliance with the Department of Transportation regulations. The bottom line is that EMI is usually involved with the proper profiling, packaging, labeling, and management of a customer's materials prior to it arriving at the EMI Transfer Station Facility. The process by which EMI will handle the materials is determined prior to arrival. No materials are ever processed at the EMI Facility without prior approval.

Once the EMI Project Coordinator has obtained the required characterization information, he initiates the creation of the appropriate shipping documents through the Waste and Materials Information Management System, which maintains detailed records of each client, i.e. names, addresses, EPA identification numbers, disposal plan numbers, wastestream information, etc. The Project Coordinator supplies the determined DOT shipping information along with the specific information about the materials to be picked up/delivered. Upon receipt of the submitted information, the Shipping and Receiving Records Management Department (SRRM) staff will review it for regulatory accuracy and print the required shipping documents and labels. The documentation is then given to the Operations Manager awaiting scheduling.

An important point of clarification is that, EMI does not dispose of any materials at the permitted Transfer Station Facility. All waste materials are shipped off-site to a properly permitted disposal facility.

6.0 INSPECTIONS

6.1 EMI-Transported Materials

Pickups are scheduled by the Operations Manager who ensures the team has all the required information regarding the material, including shipping documentation. All EMI Field Technicians hold commercial driver's licenses (CDL) with hazardous materials endorsements, which is only granted after successful passage of a skills and knowledge test on all aspects of DOT requirements for transporting hazardous materials. As part of their required training, all Field Technicians receive 40-Hour HAZWOPER Training, DOT Hazardous Materials Training, and EMI Orientation Training (which includes a review of the WEP). When they arrive at the customer's site, the Field Technicians verify that all materials are as previously approved by the Project Manager. If there are any variations from the previously-approved materials, the Field Technician contacts the Project Manager to verify the acceptability of the differing materials. The Field Technician verifies the materials are properly packaged (the containers are sealed and appropriately labeled w/ dates), and will complete the amount of material (i.e. container size and the number of containers) on the shipping documents. The driver ensures all appropriate signatures are in place and provides the client with a copy of the shipping document. See Attachment 1 for the Driver's Checklist.

When the materials arrive at the facility, the Field Technician unloads them in the proper storage area. Hazardous materials are directed to the appropriate hazardous storage area and Nonhazardous materials are directed to their approved storage areas.

6.2 Non-EMI Transported Materials

For non-EMI transported containers, drivers are required to stop at the Shipping & Receiving office and present their delivery documentation to the SRRM Supervisor. It is compared to the prepared acceptance paperwork to ensure the information corresponds. The containers are unloaded in an approved storage area and inspected. If there are any variations from the previously-approved materials, the SRRM Supervisor or Field Technician contacts the Project Manager to report the non-conforming information.

6.3 Inspection Records

The acceptance procedure and inspection steps outlined above are sufficient to ensure that incoming loads do not contain materials that cannot be processed at the Environmental Management, Inc., Transfer Station. All records are maintained on-site at the facility for a minimum of 3 years.

7.0 NON-CONFORMING MATERIALS PROTOCOL

7.1 Management

Environmental Management is a full-service environmental management company and is able to handle and arrange for the proper disposal and/or processing of any materials that may be found to not meet the pre-approved specifications.

7.1.1 EMI-Transported Materials

Upon notification by a Field Technician of non-conforming materials at a client's facility, the Project Manager will evaluate the information gathered by the Field Technician and discuss the differing material with the client. If the material is not in violation of the EMI WEP, appropriate arrangements are made to allow the Field Technician to pick up the materials and deliver to the Transfer Station. If the material is such that cannot be processed at the Transfer Station, it will be left at the client's facility until such time that arrangements can be made for the proper transportation and disposal of the material.

7.1.2 Non-EMI Transported Materials

Upon notification by the SRRM Supervisor that the delivery paperwork presented by the driver does not conform to the pre-approved information given, the Project Manager will review the presented information and contact the client to determine the nature of the discrepancy and whether or not the material is acceptable for processing at the Transfer Station. Upon approval from the Project Manager, the containers will be cleared to unload.

After the containers are unloaded in an approved storage area, they will be inspected for contents. Any variations from the previously-approved materials will be relayed to the Project Manager. The Project Manager will work with the client to determine if the materials are acceptable for processing at the Transfer Station or if they need to be sent elsewhere. The Environmental Management Project Managers have the appropriate experience and training to arrange proper transportation, processing, and disposal for non-conforming materials.

7.2 Notification of ODEQ

Since materials are not rejected from the Environmental Management, Inc., Transfer Station, notification is not required to the ODEQ.

7.3 Notification of Emergency Response Personnel

In case of load-related emergencies, facility personnel will assess the hazard posed by the situation and direct the truck to an appropriate staging area, as the situation requires. The impacted truck will be parked in the respective holding area until it is determined that it can exit the facility.

EMI Facility Management will call for emergency assistance if necessary, as per the protocol specified in the EMI Emergency Action – Site Contingency Plan.

8.0 SAFE STORAGE

If non-conforming materials are found to be in the receiving or processing areas of the Facility, the following steps shall be taken:

1. The container(s) shall be moved to a designated 'Safe Storage Area' ensuring all waste compatibility guidelines are met.
2. If it is deemed to be an emergency, the 'Safe Storage Area', shall be cordoned off with brightly colored ribbon bearing with the words "Caution".
3. The Operations Manager and Terminal Manager, or their designee(s), shall be notified;
4. The Project Manager will proceed as outlined in Section 7.0 of the WEP.

9.0 PROPER DISPOSAL

The Environmental Management Project Managers have the appropriate experience and training to arrange proper transportation, processing, and disposal for non-conforming materials.

10.0 VERIFICATION OF DISPOSAL

Verification of proper disposal will be demonstrated by retaining manifests, EMI Shipping Tickets or other shipping and receiving facility paperwork, and maintaining this documentation on file at the EMI Transfer Station Facility for a minimum of three (3) years.

11.0 RECORDKEEPING

All facility records, including material receiving and shipping records are kept for a minimum of three (3) years at the EMI Transfer Station facility.

ATTACHMENT 1

Driver Paperwork Checklist:

- Generator Information
  - Address, city, state, zip
  - Phone
  - Is it at a different pickup location, is that address on the paperwork
- Transporter1
  - Name
  - EPA ID #
  - Phone Number
- Transporter2
  - Is there a second transporter
  - Is all the information there
- Designated Facility (is it the correct destination)
  - Facility Name
  - Address, city state, zip
  - EPA ID# (if applicable)
  - Phone
- DOT Description
  - Proper shipping name
    - Materials match description
  - Number of containers
    - Matches actual number of containers
  - Type of container
    - DF and DM have to be on different lines
  - Total Quantity
    - Two 55-gls that are both half full = 55 G
    - One 30 and two 55 that are all full = 140 G
- Unit Weight/Volume
  - Gallons use "G" (liquids only)
  - Pounds use "P" (preferable in all cases)
  - Other abbreviations found on call list
- Additional Information
  - Is there anything else that might be good to know
    - A) Two 55-gl (50%each) Inside 85-gl
- Job # - you have to have one for the Daily Worksheet, make sure it's on the shipping document somewhere
- Check to make sure all signatures are there before you rip off the back copy, including both transporters if there are 2
- Does Label information match
  - Shipping name
  - Document number
  - Job number
  - Generator name and address
  - Is there a Date on the Yellow Labels
- Did it go out in a Roll-Off Box? Is the RO# *on the shipping document*?

ATTACHMENT 23

- TYPICAL VSQG CHEMICAL LIST

Environmental Management, Inc.

Drum Inventory

Wastestream: Oxidizing Solids

Drum #: 2506

Proper Shipping Name: Lab Pack Waste Oxidizing Solids , 5.1 , UN1479 , P.G. II

Drum Size: 30 gl **Drum Type:** DF

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	% Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	.5	gl	Ammonia Sulphate	S	100				
1	50	lb	Ammonium Nitrate	S	100				
1	1	gl	Ammonium Nitrate Sediment	L	60				
1	12	oz	Caustic	S	50				
1	25	gm	Chromic Acid	S	60				
1	5	lb	Nitrate of Soda	S	100				
1	2	oz	Potassium Dichromate	S	100				
1	1	lb	Potassium Permanganate	S	50				
1	453	gm	Potassium Permanganate	S	75				
4	1	lb	Pottasium Dichromate	S	75				
1	500	ml	Pottasium Permanganate	L	50				
1	40	lb	Sulfate of Ammonia	S	80				

Environmental Management, Inc.

Drum Inventory

Wastestream: Toxic Solids

Drum #: 2581

Proper Shipping Name:

Drum Size: 15gl **Drum Type:** DF

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	% Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	150	gm	(ID=Piperidine Hexahydrate)	S	30				
1	1	qt	(ID=Sodium Metavenedate)	S	30				
1	25	gm	3,4,5 Trimethyloxybenzaldehyde	S	50				
2	100	gm	Benzoquinone	S	25				
1	1	gm	Palladium Chloride	S	10				
1	100	gm	Phenylacetic Acid	S	60				

Environmental Management, Inc.

Drum Inventory

Wastestream: Mercury Compounds

Drum #: 2618

Proper Shipping Name: Labpack Mercury Compounds, liquid, N.O.S. , 6.1 , UN2024 , P.G I

Drum Size: 5gl **Drum Type:** DF

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	% Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	10	lb	Unused Mercury Switches in 5gl DF	S	100				

Environmental Management, Inc.

Drum Inventory

Wastestream: Flammable Solid, Organic

Drum #: 2567

Proper Shipping Name: Flammable Solid, Organic, N.O.S.

Drum Size: 55gl **Drum Type:** DM

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	% Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
3	5	gl	Isobutyronitrile (flammable)	S	100				

Environmental Management, Inc.

Drum Inventory

Wastestream: Chloroacetone

Drum #: 2485

Proper Shipping Name:

Drum Size: 1 gl **Drum Type:** AP

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	X Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	500	gm	Chloroacetone	L	100				

Environmental Management, Inc.

Drum Inventory

Wastestream: Waste Paint Related Material **Drum #:** 2472

Proper Shipping Name: Waste Paint Related Material , 3 , UN1263 , P.G. II **Drum Size:** 55 gl **Drum Type:** DM

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	% Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	5	gl	Aluminum Roofing Tar	L	100				
1	10	oz	DAP	L	100				
1	1	gl	Denatured Alcohol	L	100				
1	5	gl	Drylock waterproofer	L	100				
1	1	gl	Epoxy Resin	L	100				
3	5	gl	Flammable	L	100				
2	5	gl	Flammable Paint	L	100				
2	1	gl	Flammable Paint	L	100	3			
1	1	gl	Lawnmower Oil	L	10				
4	1	gl	Paint	L	100				
2	1	qt	Paint	L	100				
4	5	gl	Paint	L	100				
5	1	gl	Paint	L	100				

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	%	Full DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	7	gl	Paint Related Material	L	50				
1	5	gl	Paint Thinner	L	100				
4	1	qt	Polyurethane Resin	L	100				
1	5	gl	Roof Tar	L	100				
1	5	gl	Roofing Tar	L	100				
5	1	gl	Rustoleum paint	L	100				
1	5	gl	Sealer	L	100				
1	35	gl	Xylene Butanol	L	100				

Environmental Management, Inc.

Drum Inventory

Wastestream: Lab Pack Oxidizing Liquids

Drum #: 1937

Proper Shipping Name: , , ,

Drum Size: 15gl **Drum Type:**

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	% Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	1	lb	Ammonium Chromate	S	100				
1	1/2	pt	barium nitrate	L	100				
1	25	ml	barium nitrate	L	100				
1	500	ml	barium nitrate	L	100				
1	8	oz	cadiminum nitrate	L	100				
1	1	gl	cupric nitrate	L	100				
1	25	ml	cupric nitrate	L	100				
1	1	qt	hydrogen peroxide sol	L	100				
1	1	pt	hydrogen peroxide sol	L	100				
2	40	ml	lead nitrate	L	100				
1	1	lb	potassium dichromate	S	100				
1	1/2	pt	potassium iodate sol	L	100				
1	100	ml	potassium nitrate	L	100				

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	% Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	500	ml	potassium permanaganate	L	100				
3	1/2	pt	sodium chromate	L	100				
1	500	gm	sodium chromate	S	100				
1	1	gl	urea	L	100				

Environmental Management, Inc.

Drum Inventory

Wastestream: Toxic Liquid

Drum #: 1798

Proper Shipping Name: Toxic Liquids N.O.S. , 6.1 , , P.G. III **Drum Size:** 15 gl **Drum Type:**

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	% Full	DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	200	ml	2-Methyl Phenol	L	90		III		
1	100	ml	Acetylcholine Bromide	L	10	3	III	D001	
1	1	L	Bromoform	L	60	3	III	D001	U225
1	4	oz	Bromolauric Acid	L	100	8	III	D002	
1	16	oz	Diazinon Pesticide	L	50	6	III		
2	50	ml	Hematoxin Solution	L	100				
1	100	ml	Hematoxin Solution	L	100				
1	200	ml	Ortho Tolidine	L	40	8	III	D002	
4	200	ml	Phenol Reagent	L	100	8	III	D002	
1	22	ml	Phenol Red	L	100				
1	1	L	Phenylhydrazine	L	60		III		
2	1	lb	Potassium Ferrocyanide	S	50				
1	.25	lb	Potassium Ferrocyanide	S	30				

Monday, June 19, 2000

# of Units	Quantity	Unit of Measure	Description of Materials	L/S	%	Full DOT Hazard Class	Packing Group	RCRA Waste Code	Additional Waste Codes
1	1	lb	sodium bisufite	S	100	4.1	1	D001	
1	8	oz	Sodium Selenine	L	60	6.1	III		

ATTACHMENT 24

- HEALTH & SAFETY PLAN

NOTE:

In the interest of avoiding additional cost and bulk to the 2018 EMI D&O Plan Binder, the attachments to the Health & Safety Plan have not been included in this version. A complete copy of the EMI Health & Safety Plan is available for review at 5200 NE Hwy 33, Guthrie, OK.

Environmental Management
Health & Safety Plan

Environmental
MANAGEMENT

February 2018

for an environment we can all live with today & tomorrow

Post Office Box 700 / Guthrie, Oklahoma 73044-0700 / 405-282-8510 / Web Site: WWW.EMIOK.com

ENVIRONMENTAL MANAGEMENT HEALTH AND SAFETY PLAN

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Volume 1

General Safety/Health Provisions
Safety Plan Introduction

1.1 Purpose

The intent of this program is to ensure that all employees and sub-contractors are provided a safe work environment free of any unsanitary, hazardous or dangerous conditions that could potentially impact the health or safety of those employees.

1.2 Administrative Responsibilities

It shall be the responsibility of Environmental Management to initiate and maintain such programs as may be necessary to ensure the safety of employees on all jobsites and terminal operations.

1.2.1 Frequent inspection of all job sites, facility operations, materials and equipment shall be performed by a competent person as designated by Environmental Management.

1.2.2 Should an inspection identify any unsafe condition, i.e., damaged equipment, improper use of equipment or materials, or any other health or safety consideration, that process or condition shall be identified as unsafe and immediate action taken in the form of; repair, removal, lockout or tagging of controls or other means to ensure worker safety.

1.2.3 Only those employees that are qualified by training or experience shall be allowed to operate equipment and/or machinery or to perform work activities in hazardous locations.

1.3 Training Requirements

1.3.1 Environmental Management shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his or her work environment to control or eliminate any hazards or other exposure to illness or injury.

1.3.2 Employees required to handle or use poisons, acids, caustics, and other harmful substances shall be instructed regarding the safe handling and use, and be made aware of the potential hazards, personal hygiene, and personal protective measures required.

1.3.3 Employees required to handle or use flammable liquids, gases or toxic materials shall be instructed regarding the safe handling and use, and be made aware of the potential hazards, personal hygiene, and personal protective measures required.

1.3.4 On those job-sites where harmful plants or animals are present all affected employees shall be instructed regarding the potential hazards, how to avoid injury, and the first aid procedures to be utilized in the event of injured

Abrasive Blasting 2015

1. Employee exposure

Environmental Management, Inc. (EMI) will not expose employees over the Threshold Limit Values (TLV's). Whenever hazardous substances such as dusts, fumes, mists, vapors, or gases exist or are produced, their concentrations shall not exceed the limits specified in the "Threshold Limit Values of Airborne Contaminants - 1970" of the American Conference of Governmental Industrial Hygienists. Toxic dust can be produced from materials after they have shattered and pulverized during blasting operations. A local exhaust ventilation system will be used to remove any toxic substances from the work area, or employees will wear an abrasive-blasting respirator, if an exhaust system cannot be utilized. While working with toxic chemicals and while performing abrasive blasting work the supplied air will be grade D breathing air.

EMI will use the company's established Respiratory Protection Program.

2. Bonding and Grounding

The blast nozzle will be bonded and grounded so there will not be a build-up of static electric charges while work is being completed in areas where there is a potential for the build-up of flammable vapors.

3. Work-site procedures

Prior to performing work, a Job Safety Analysis will be completed. The JSA will ensure the proper personal protective equipment is being utilized.

4. Personal Protective Equipment (PPE)

PPE will be provided so the employee will have protection provided for employee(s) eyes, face, and body. PPE will be provided to all employees that are working in the vicinity of blasting operations.

5. Blast Nozzles

EMI owned blast cleaning nozzles will be equipped with a "deadman valve".

6. Compressed Air Cleaning

Compressed air that will be used to clean an employee will be reduced to less than 30 p.s.i.

ASBESTOS
PLAN

Environmental
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"Fiber" means a particulate form of asbestos 5 micrometers or longer, with a length-to-diameter ratio of at least 3 to1.

"Friable Asbestos Material" means any material that contains asbestos of 1% or more that can be crumbled, pulverized or reduced to powder by hand pressure.

"Friable Asbestos Material Abatement" means the removal, encapsulation, or enclosure of friable asbestos containing material.

"High Efficiency Particulate Air (HEPA) Filter" means a filter capable of trapping and retaining at least 99.97% of 0.3 micrometer diameter mono-disperse particles.

"PACM" means presumed asbestos containing material.
"Presumed containing asbestos material" means thermal system insulation and surfacing material found in buildings constructed no later than 1980.

"Surfacing ACM" means surfacing material that contains more than 1% asbestos.
"Surfacing Material" means material that is sprayed, trawled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, etc.

"Thermal System Insulation (TSI)" means any ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.

Those designated Environmental Management employees who are required to transport friable asbestos are required to attend a course consisting of no less than four (4) days of instruction which shall include lectures, demonstrations, at least fourteen (14) hours of hands-on training, individual fit testing, course review and examination. The following elements constitute the minimum core curriculum. **Also defined as the worker course.**

A. Physical characteristics of asbestos

B. Potential health effects, dose/response, etc; with an emphasis on the synergistic effects of cigarette smoking and asbestos exposure

C. PPE and Respiratory Protection selection, donning/doffing, cleaning, maintenance, etc.

D. State-of-the-art work practices

E. Personal Hygiene

F. Safety hazards

G. Medical Monitoring

H. Air Monitoring

I. Relevant federal, state, and local regulatory requirements

J. Establishment of a "Respiratory Protection Program"

1.6.2 Contractors and Supervisors

In addition to the four (4) day course, Contractors and Supervisors must also complete one (1) additional day of training and must have training certification in the following areas.

A. CPR/First Aid

B. NIOSH 2 day course in air monitoring

C. OSHA Confined Space

Environmental Management currently employs workers and inspectors licensed with the state of Oklahoma at Environmental Management. All other Environmental Management employees receive awareness level training in reference to the hazards of friable asbestos.

1.6.3 Other Training

A. All Environmental Management employees are trained in the proper use of Air Purifying Respirators (APR'S), Self-Contained Breathing Apparatus (SCBA), and Supplied Air Respirators (SAR'S). Reference the Respiratory Protection Program in Part XXI of this Health & Safety Plan. The appropriate respiratory device shall be worn when air monitoring indicates concentrations above the permissible Exposure Limit.

B. Quantitative Fit Testing is performed using the TSI Portacount Plus as outlined in Appendix A of 29 CFR 1910.134

C. All affected employees are also included in the Environmental Management Medical Surveillance Program. Reference specific program requirements in Part XVII of this Health & Safety Plan.

D. The existing Environmental Management "Personal Protective Equipment Program" will provide information on proper selection and use of protective garments when handling "glovebags" containing friable asbestos.

E. Employees shall adhere to all instructions associated with labels, signs, and placards that communicate the hazards and/or proper handling of friable asbestos.

1.7 Asbestos Awareness

1.7.1 Locations that contain Asbestos

There are no locations at Environmental Management that were constructed using asbestos materials. There are facilities that Environmental Management contracts to that does contain asbestos. Employees are made aware of the locations and are instructed not to disturb and to avoid the area if possible.

1.7.2 Hazard Awareness

Asbestos is an inhalation hazard that causes cancer. Asbestos has been linked to cancers such as lung, esophagus, larynx, oral cavity, stomach, colon and kidney. The likelihood of developing diseases is: **The amount and duration of exposure, Whether or not you smoke, and Age**

BENZENE

Environmental
MANAGEMENT

2016

1.1 Purpose

The purpose of this program is to insure that all employees of Environmental Management are properly protected from the hazards of benzene in the workplace. This program identifies Environmental Management's commitment to employee health and safety by identifying both the physical and health hazards of the chemical, and by establishing policies, procedures and standard operating guidelines in accordance with 29 CFR 1910.1028 for the safe handling of this chemical.

1.2 Scope

This program is applicable to all field technicians who have the potential to be exposed to benzene during field activities, facility activities or an emergency response where the chemical benzene, those compounds containing benzene, or hazardous waste containing benzene is present. All sub-contractors of Environmental Management shall develop a program that contains, at a minimum, the requirements established within this document. If the sub-contractor has no program, they must utilize the program set forth by Environmental Management when performing work under this company.

1.3 Definitions

"Action Levels" means an airborne concentration of benzene of 0.5 ppm calculated as an 8-hour time-weighted average.

"Authorized Person" means any person specifically authorized by the employer whose duties require the person to enter a regulated area.

"Benzene" $C_6 H_6$ CAS Registry # 71-43-2 means liquefied or gaseous benzene. It includes benzene contained in liquid mixtures and the benzene vapors released by these liquids. It does not include trace amounts of unreacted benzene contained in solid materials.

"Emergency" means any occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment, which may or does result in an unexpected significant release of benzene.

"Employee Exposure" means exposure to airborne benzene, which would occur if employee were not using respiratory protective equipment.

"Regulated Area" means any area where airborne concentrations of benzene exceed or can be reasonably expected to exceed the permissible exposure limits, either the 8-hour time weighted average exposure of 1 ppm or the short-term exposure limit {STEL} of 5 ppm for 15 minutes.

1.4 Background

Benzene is the 16th highest volume chemical produced in the U.S. (1995). It is the simplest aromatic hydrocarbon. Its primary use is as a chemical intermediate and as a solvent. Although benzene is not utilized in any process at Environmental Management on a daily basis, there exists the potential to encounter the chemical during lab-packing operations, transportation accidents, container failures or equipment control failures at customer facilities. Therefore, benzene represents a significant health and safety hazard to employees who may be required to respond to an incident involving benzene. To ensure maximum protection against exposure all employees must be aware of the physical properties, unique characteristics and the toxicological capacity of the chemical. It is the responsibility of the site supervisor, safety officer and training personnel to insure that all employees have been properly trained in the hazards associated with benzene.

1.5 Characteristics of Benzene

Benzene is a colorless to light-yellow non-polar liquid. Aromatic odor (benzene like) Boiling Point 80.1 C., Freezing Point 5.5 C., Specific Gravity 0.8790, Wt/gal 7.32 #, Flash Point 12^0 F., Autoignition Temp 1044^0 F., Slightly soluble in water. Vapors burn with a smoky flame. Explosive limits/range: 1.5% to 8.0%. Short term effects of overexposure may include: irritation of eyes, nose and skin, breathlessness, irritability, euphoria, headache, dizziness, or nausea. Long term effects may result in blood disorders such as leukemia and anemia.

1.6 Exposure Control Monitoring

The Permissible Exposure Limit (PEL) established by OSHA is 1.0 ppm as an 8-hour time weighted average. To provide adequate employee safety Environmental Management shall insure that no employee is exposed to an airborne concentration in excess of the PEL without appropriate respiratory protection. All air monitoring shall be performed in accordance with 29 CFR 1910.1028.

Those areas established as "Regulated Locations" are only accessible to authorized employees. The following areas are examples of a "Regulated Location":

* Mixing Room

* Hazardous Materials Dock

* Established Exclusion Zones (Hot Zone)

* Any area determined by air monitoring to contain airborne concentrations exceeding the PEL

Environmental Management has determined that the most protective measures available shall be instituted to insure that the airborne concentrations of benzene are not allowed to exceed the PEL. This shall be accomplished by utilizing engineering controls, and/or work practices except to the extent that they prove to be infeasible. When said controls or practices prove to be insufficient, they shall be utilized to reduce exposures to the lowest achievable levels and supplemented by the use of appropriate respiratory protection. Environmental Management has determined that the only area requiring engineering controls in the form of breathing zone ventilation is the Mixing Room. Worker practices are outlined for activities in this area and those additional locations identified at the Environmental Management facility. Due to the uncertainty and inability to pre-plan an emergency response, specific engineering controls and worker practices established at locations other than the Environmental Management facility shall be identified in the "Site Specific Health & Safety Plan" developed for that incident. The program shall be reviewed as required, or at least annually, and shall be revised based on the most current data related to the product. Benzene liquid is highly flammable and vapors may form explosive mixtures in air. Fire extinguishers must be readily available in areas where benzene is used or stored.

1.7 Respiratory Program

Environmental Management's Respiratory Protection Program currently meets all the requirements of 29 CFR 1910.134. The additional requirements set forth in 29 CFR 1910.1028 shall be incorporated to insure a comprehensive program specific to the handling of benzene.

* All respirators shall be NIOSH approved

* Respirator selection shall be made according to Table 1, 1910.1028(g)(3)(ii)

1.8 Personal Protective Equipment

All employees of Environmental Management shall be provided appropriate Personal Protective Equipment (PPE) at no cost. It is the employee's responsibility to utilize said PPE in a manner that will prevent eye contact and limit dermal exposure to liquid benzene and to properly utilize respiratory protection for protection from exposure to the vapors of benzene. All eye and face protection shall meet the requirements established in 29 CFR 1910.133. All respiratory equipment shall meet the requirements established in 29 CFR 1910.134.

1.9 Medical Monitoring Program

Environmental Management shall develop a Medical Surveillance Program for all employees that are exposed to benzene at or above the "Action Level" (0.5 ppm) for 30 days or more a year and for those employees exposed to benzene at or above the PEL 10 or more days a year.

A licensed physician shall perform all medical examinations. An accredited laboratory shall perform all laboratory tests. All examinations shall be free of cost and at a reasonable time and place. Additional requirements regarding initial examinations, periodic examinations, emergency examinations, referrals and follow-up shall conform to the minimum requirements established in 29 CFR 1910.1028 (i)(1) – (i)(6)(i).

1.10 Hazard Communication

All entrances to regulated areas shall be posted utilizing the following legend:

Danger
Benzene
Cancer Hazard
Flammable- No Smoking
Authorized Personnel Only
Respirator Required

All containers of benzene shall be properly identified with an appropriate label or other form of warning. All labeling shall conform to 29 CFR 1910.1200 (f), and in addition shall include the following legend:

Danger
Contains Benzene
Cancer Hazard

Environmental Management shall provide all employees access to a Safety Data Sheet (SDS) for benzene that complies with 29 CFR 1910.1200.

1.11 Information and Training

Environmental Management shall provide initial training to all employees prior to assignment to a work task where benzene is present. If exposures are above the action level, employees shall be provided with information and training at least annually thereafter. Training shall comply with 29 CFR 1910.1200 (h)(1)(2) and shall also include chemical specific information on benzene. The following elements shall be a part of the employee-training program:

* An explanation of the Benzene standard 29 CFR 1910.1028

* The medical surveillance program

1.12 Recordkeeping

All medical and exposure records shall be compiled and retained in accordance with 29 CFR 1910.1028 (k).

* Exposure records must be retained for 30 years

* Medical records must be retained for the duration of employment plus 30 years

A copy of this program shall be maintained in the office library for employee or agency usage. Copies shall be provided upon request.

Appendix A

29 CFR 1910.1028 Regulations

Appendix B

Benzene Safety Data Sheet

BLOODBORNE PATHOGENS
29 CFR 1910.1030

Environmental
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2015

1.1 Purpose

The purpose of Environmental Management's exposure control plan is to eliminate or minimize employee occupational exposure to blood or other potentially infectious materials (OPIM), identify employees occupationally exposed to blood or OPIM in the performance of their regular job duties, provide information and training to employees exposed to blood and OPIM, and comply with Occupational Safety and Health Administration's Bloodborne Pathogens Standard, "29 CFR 1910.1030.

1.2 Responsibility for Compliance

The Health and Safety Officer has the authority and responsibility to ensure that all elements of the exposure control plan are in place and that all employees have total access to this plan. The exposure control plan can be obtained from the Health and Safety Officer or from an immediate supervisor.

1.3 Exposure Determination

In determining employee exposure, it is necessary to examine the various work related activities that are performed by the organization. Environmental Management provides a full range of services in the area of hazardous materials remediation. In many instances there exists the potential for occupational exposure to blood or other potentially infectious body fluids during these activities. These activities include but are not limited to cleaning up drug labs, working in morgues, cleaning up body fluids in private residences and vehicles, and performing confined space rescue. In addition, all environmental management employees are trained in basic first aid and CPR and therefore have the potential to contact an infectious substance when administering medical aid. Because there is a potential for exposure, all employees are hereby identified as an exposure risk and are fully covered by the program.

1.4 Protective Methodologies

To provide the maximum level of employee protection from bloodborne pathogens and OPIM's, a hierarchy of protective methodologies and procedures has been developed by Environmental Management. These procedures shall be followed by all employees and are described below.

1.4.1 Universal Precautions

Universal precautions shall be utilized by all employees of Environmental Management in order to prevent contact with blood or other potentially infectious materials. **All blood or other potentially infectious material shall be considered infectious regardless of the perceived status of the source or individual.**

1.4.2 Engineering Controls and Work Practices

Engineering controls and work practices shall be utilized to eliminate or minimize employee exposure before personal protective equipment is selected as the first and best protective methodology. Where the potential for exposure remains after the institution of engineering and work practice controls; appropriate personal protective equipment shall also be utilized. Environmental Management has provided the following engineering controls and worker practices to insure employee safety.

A. Sharps Containers

All sharps containers utilized at Environmental Management shall be of an approved design to insure that they are puncture resistant and leak proof. They shall be properly labeled using the prescribed biohazard label. Sharps containers are located in the following areas:

(1) All drug response trailers, RT-40 and RT-16

(2) Emergency response trailer, RT-6

(3) Mix room and maintenance shop

Note: Contaminated needles or other contaminated sharps shall not be bent, recapped, removed, sheared, or purposely broken. Environmental Management has determined that there will never be a need for such action, and all sharps shall be transferred to an appropriate container intact.

B. Exposure Incident Investigation

An exposure incident is defined as contact with blood or other potentially infectious materials on an employee's non-intact skin, eye, mouth, other mucous membrane or by piercing the skin or mucous membrane through such events as needle sticks.

An exposure incident investigation form will be completed each time an exposure incident occurs (See Appendix D).

C. Hand Washing

Employees must was their hands upon removal of gloves and other protective PPE. If an employee suspects exposure, they shall wash the effected area with soap and water or waterless antiseptic as soon as feasibly possible. Environmental Management has provided the following washing facilities to meet the 29 CFR 1910.1030 requirements.

(1) Conventional rest room locations within the office complex

(2) Eye-wash and emergency shower stations in handling areas

(3) Waterless anti-bacterial products in vehicles

D. Housekeeping

Employees who have received bloodborne pathogen training and who have been included in the exposure control plan are the only ones authorized to clean up biohazard spills. Contaminated areas must be cleaned as soon as possible with disposable absorptive materials to soak up the fluids. Clean the area with chemical germicides or a 1:10 liquid bleach solution. Place absorptive towels, pads, and other material used to mop up spills in plastic bags or designated, labeled containers and treat as biohazard waste.

All equipment that has been contaminated with blood or other potentially infectious substances shall be decontaminated prior to re-use, unless the decontamination of such equipment is not feasible. Those items that are not capable of being adequately decontaminated shall be disposed of in an appropriate manner.

Laundry or clothing contaminated with blood or other potentially infectious substances shall be handled as little as possible. Such laundry/clothing shall be placed in appropriately labeled bags at the contaminated location. No rinsing or sorting of garments shall be done in area of use. Individual circumstances will dictate how garments are to be handled. (Laundry or take home.)

E. Waste Disposal

Regulated waste other than sharps, i.e., bandages, gauze, feminine products, etc shall be discarded in appropriate containers utilizing a plastic liner with the biohazard label (Red Bags).

Note: No sharps are to be disposed of in these biohazard bags or containers!!!

F. Work Area Restrictions

Those areas that are designated as chemical handling areas by appropriate signage shall also be designated as potentially infectious areas due to the products that may be stored there. All current restrictions in these work areas are equally applicable under this program. Employees working in these areas are prohibited from:

(1) Eating

(2) Drinking

(3) Applying cosmetics or lip balm

(4) Smoking, dipping, chewing

(5) Handling contact lens

1.4.3 Personal Protective Equipment

All personal protective equipment (PPE) utilized at Environmental Management shall be provided without cost to the employee. PPE shall be selected based on the anticipated exposure to blood or other potentially infectious substances. The PPE shall be considered appropriate only if it does not allow blood or other potentially infectious substances to permeate to employee's clothing, skin, eyes, mouth or other mucous membranes under normal conditions of use and for the duration of time which the PPE shall be used. The following examples constitute PPE provided by Environmental Management.

A. Gloves

As a minimum, absorption resistant gloves shall be worn where it is reasonably anticipated that the employees could come in contact with blood or other potentially infectious substances. All gloves are disposable and are not to be washed or decontaminated for re-use. Gloves should be replaced as soon as feasible if torn, punctured, or when their ability as a barrier has been compromised. Environmental Management provides the following gloves for its employees:

(1) Disposable Gloves (Latex, Nitrile, Neoprene)

(2) Puncture Resistant (Gortex)

B. Eye Protection

Eye and face protection are required to be worn when there exists the potential for splashing, sprays, splattering, or droplets of blood or other potentially infectious substances being generated that could contaminate the eyes, nose or mouth. Environmental Management provides the following eye and face protection for its employees:

(1) Safety Glasses

(2) Chemical Goggles

(3) Face Shields

C. Splash Protection

Splash protection is required to be worn when the potential for splashing, sprays, splattering, or droplets of blood or other potentially infectious substances exists and could contaminate the feet or body. It is the employee's responsibility to immediately remove any garment that has been compromised and to dispose of garment in an approved fashion. Environmental Management provides the following splash protection for its employees:

(1) Tyvek Coveralls

(2) Saranex Coveralls

(2) Tyvek Boot Covers

D. Respirators

Respirators are required if there is a risk of exposure due to airborne contaminates entering the employees respiratory system. Environmental Management provides its employees with Scott AV-2000 full face respirators which can be used in an assortment of applications such as:

(1) Air Purifying Respirators (APR)

(2) Self Contained Breathing Apparatus (SCBA)

(3) Supplied Air Respirators (SAR)

E. Resuscitation Devices

Resuscitation devices shall be used to minimize contact with blood or OPIM when performing first aid or cardiopulmonary resuscitation (CPR). Environmental Management provides the following resuscitation devices for its employees:

(1) Bag-Valve Masks

(2) Pocket Masks

1.5 Hepatitis B Vaccination Program

All Environmental Management employees who have been identified as having a potential occupational exposure to blood or other potentially infectious substances will be offered the Hepatitis B vaccine at no cost. Program requirements can be found in Appendix A. The vaccine will be offered within 10 working days of their initial assignment to work involving the potential for occupational exposure to blood or other potentially infectious substances, unless the employee has previously had the vaccination, or who wishes to submit to antibody testing which shows the employee to have sufficient immunity. Any employee has the right to refuse the hepatitis B vaccination. Employees who decline to accept the vaccine will be required to sign the declination statement found in Appendix .

Note: Employees who initially decline the vaccination but who later wish to have the vaccine will be vaccinated at no cost

1.6 Exposure/Post Exposure

Any employee who incurs an exposure shall immediately report the exposure to their immediate supervisor. It is the supervisor's responsibility to confirm exposure, document route of exposure, and insure proper follow-up and documentation.

All employees shall be offered post-exposure evaluation and follow-up in accordance with 29 CFR 1910.1030.

1.6.1. The follow-up shall include the following elements.

A. Immediate reporting to the Oklahoma Department of Health.

B. If possible, the identification of source or source individual and, if possible, source status. The blood of a source individual will be tested for HIV/HBV infectivity. **Consent must be obtained from source.**

C. Test results of the source individual will be made available to the exposed employee and applicable laws and regulations concerning disclosure of the identity and infectivity of the source individual will be disclosed.

D. The employee will be offered the option of having their blood collected and tested for the HIV/HBV serological status. The blood sample will be preserved for 90 days to allow the employee to decide if the blood should be tested for HIV serological status. However, if the employee decides prior to that time that testing will or will not be conducted then the appropriate action can be taken and the blood sample discarded.

E. The employee will be offered post exposure prophylaxis in accordance with the current recommendations of the U.S. Public Health Services. See Appendix B.

F. The employee will be give appropriate counseling concerning precautions to take during the period after the exposure incident. The employee will also be given information on what potential illnesses to be alert for and to report any related experiences to appropriate personnel.

The Health and Safety Officer has been designated to assure that the policy outlined here is effectively accomplished and documented.

1.7 Interaction with Health Care Professional

1.7.1 A written opinion shall be obtained from the HCP who evaluates employees of Environmental Management. Opinions shall be obtained under the following circumstances:

A. When the Hepatitis B Vaccine is initially administered

B. Whenever an employee is examined by the HCP following an exposure

1.7.2 Health Care Professionals shall be instructed to limit their opinions to:

A. Whether the hepatitis vaccine is indicated and if the employee has received the vaccine, or for evaluation following an exposure

B. That the employee has been informed of the results of the evaluation

C. That the employee has been told about any medical conditions resulting from the exposure to blood or other potentially infectious substances

Note: The written opinion to the employer must not reference any personal medical information

1.8 Employee Training

Training of employees shall be conducted prior to assignment of tasks where an occupational exposure may occur, and annually thereafter. Training shall be conducted through the direction of Environmental Management's Training Officer.

1.8.1 Employee training shall consist of the following elements.

A. 29 CFR 1910.1030, Standard for Bloodborne Pathogens

B. The epidemiology and symptomatology of Bloodborne diseases

C. Modes of transmission

D. The Exposure Control Plan

E. Procedures that might cause an exposure to blood or other potentially infectious substances

F. Control methodologies, which shall be used to control exposure

G. PPE selection and use

H. Post exposure evaluation and follow-up treatment

I. Proper use of signs and labels (See Appendix C)

J. Hepatitis B vaccination program protocols

1.9 Recordkeeping

1.9.1 All exposure and medical records required by the OSHA Standard shall be maintained in accordance with OSHA 29 CFR 1910.1020 and Environmental Management's existing Medical Monitoring Program. Exposure records shall be maintained for 30 years and medical records for 30 years plus duration of employment.

1.9.2 All training records are maintained in accordance with OSHA and Environmental Management's existing employee record keeping system.

1.9.3 Initial training and annual refresher training records shall be included in employee's personnel files. All training records become a part of the employee's permanent file. It shall contain the date and content of training, employee name and title and shall be maintained for 3 years from date of training.

1.9.4 Copies of training curriculum are maintained by the training department and located in the training center. A copy of this program is maintained in the office library and is available to all employees. Copies shall be available upon request.

1.9.5 The Records Administrator is responsible for the maintenance, accuracy, and confidentially of all exposure and medical records associated with the Bloodborne Pathogens Program. All aforementioned records shall be made available upon request by the affected employee for examination and copying. In addition, exposure, medical and training records shall be made available for examination and copying by the Assistant Secretary or Director of OSHA. Release of medical records requires employee consent. Transfer of records must be performed in accordance with 29 CFR 1910.1020 (h).

Appendix A
Hepatitis B Vaccination Program

Appendix B
Post Exposure Procedures/Testing

Appendix C
Labels and Signs

Appendix D
29 CFR 1910.1030

CADMIUM PROGRAM

Environmental
MANAGEMENT

2004

1.1 Purpose

Environmental Management personnel may, from time to time, be involved with an incident that presents a cadmium hazard. Because of the work Environmental Management does for its clients, and the locations where the work occurs, a comprehensive program of engineering controls to minimize worker exposure is not always practical. Environmental Management will rely in many cases on Personal Protective Equipment as outlined in the Site Safety and Health Plan, and onsite monitoring to provide personnel with adequate protection from cadmium exposure as measured at each incident. The plan shall be effective whenever air monitoring determines concentrations of 2.5 micrograms per cubic meter of air calculated as an 8-hour time weighted average (PEL).
This written program shall be made available to all employees for examination and copying upon request. In addition, employee representatives as well as the Assistant Secretary and the director shall have access.
This program shall be evaluated at least annually, or in response to problems or inadequacies identified by exercise or implementation of the Cadmium Awareness Program.

1.2 Site Safety and Health Plan and Cadmium

The Site Safety and Health Plan is part of the Environmental Management Health and Safety Plan and is in the possession of all Environmental Management Supervisors. A copy of the plan is also available from the Safety Officer, or may be obtained from the Health and Safety Database. When cadmium is suspected or identified during work activities, it will be included as one of the site hazards in the Site Safety Health Plan. In addition, a copy of the MSDS or other appropriate chemical information shall be attached to the Site Safety Health Plan. All site personnel will be briefed on the site hazards prior to work commencing at any site. As a minimum the plan shall address the following elements.

- The point source or location where cadmium is being omitted
- A description that defines the type and extent of engineering controls needed
- Appropriate data to sustain the effectiveness of selected control methods
- The air monitoring plan and the data obtained during monitoring
- A schedule that clearly delineates implementation of protective methodologies
- Worker practice and administrative control plan
- An emergency response plan

- Other relevant information pertinent and site specific

1.3 Cadmium Respiratory Protection

Respiratory protection for cadmium exposure will be determined based on air monitoring performed at the job location prior to any employee performing activities where a cadmium exposure is possible. Appropriate respiratory protection shall include the use of either NIOSH/DHHS approved Air Purifying Respiratory protection with P 100 filters (for known concentrations of cadmium between the PEL and the IDLH) or NIOSH/DHHS approved Atmosphere Supplying Respirators (Airline or SCBA) for unknown concentrations or concentrations above the IDLH. The minimum respiratory protection requirements are outlined in the Environmental Management Health and Safety Plan, prepared in accordance with 29 CFR 1910.134.

1.4 Cadmium PPE

Personal Protective Equipment for identified cadmium exposures shall be identified in the Site Safety Health Plan and will be consistent with the Environmental Management Health and Safety Plan, prepared in accordance with the provisions of 29 CFR 1910.127. All required chemical PPE will be provided by Environmental Management.

1.5 Cadmium Training

Employees of Environmental Management have the potential to encounter a wide variety of chemicals while performing work activities at the Guthrie facility, during field operations at client locations, and while responding to hazardous materials emergencies. Environmental Management has developed numerous training classes to address the physical and chemical properties, toxicology, and personal protective equipment requirements of many chemicals including cadmium. The following OSHA standards are utilized to design, develop, and deliver adequate training programs in the area of chemical handling and exposure control.

- 29 CFR 1910.120
- 29 CFR 1910.1200
- 29CFR 1910.134
- 29 CFR 1910. 1027

While this list is by no means comprehensive, it does address the significant regulations associated with the safe handling of chemicals in the workplace.

Training of all employees shall occur prior to assignment and on an annual basis thereafter. In the case of cadmium, employees shall be provided chemical specific

training prior to being assigned to activities that could potentially expose workers to levels above the Permissible Exposure Limit (PEL). A training certificate that includes employee identity, date of training, name of trainer, and employee signature shall be prepared and retained for a minimum of one (1) year from training date.

1.6 Maintenance Procedures

Should any employee of Environment Management be involved in the maintenance of a ventilation system or the changing of filters of said system, procedures shall be established to minimize potential employee exposure. Because of the inability to predict the type or configuration of a system, all procedures must be developed based on the hazards presented on a particular application and site-specific measures taken.

1.7 Emergency Situations

Prior to any work being performed in an area where the potential exists to expose workers to substantial releases of airborne cadmium a written plan for dealing with the emergency shall be developed. The plan shall include provisions for the use of appropriate respirators and personal protective equipment (PPE). In addition, non-essential employees shall be prohibited from entering the area of contamination and normal work operations must be halted until the emergency is abated.
Respirator use shall be in accordance with the provisions of 29 CFR 1910.134 and the Environmental Management Health and Safety Plan. PPE selection and use shall be in accordance with the Environmental Management personal protective equipment health and safety plan and related OSHA requirements.

1.8 Medical Surveillance

All employees are covered under the Environmental Management Medical Surveillance Program which is located within this Health and Safety Plan. Many of the requirements set forth in 29 CFR 1910.1027 (l) are currently being addressed in the existing Medical Surveillance Program. The following constitutes additional elements that must be addressed to comply with the cadmium exposure requirements.

- The attending physician shall be supplied with 29 CFR 1910.1027, Appendix A, D & F
- Blood work shall be performed in accordance with Appendix F
- Urine specific sampling for Cadmium shall be performed
- All other requirements as defined in 29 CFR 1910.1027 (l)(1)- (l)(16)

1.9 Summary

It is the intent of Environmental Management to provide a safe and healthy work environmental, free of any workplace hazards. While cadmium is not a substance that is present during most job activities there does exist the possibility for an employee to perform tasks that could include airborne cadmium in concentrations that exceed the PEL. This program has been developed to address those occurrences. If you have additional information that will improve this program please contact you're immediate supervisor or the Health and Safety Officer. If you have questions or require additional information, do not hesitate to verbalize your concerns. Safety is always the primary consideration and the driving force to develop better programs.

Appendix A

29 CFR 1910.1027

Contractor Safety

- Their staff members are trained in appropriate safety procedures, including chemical-specific training as required. Individual safety files are maintained in Personnel for all associates.

- They notify the Health & Safety Officer, and complete the necessary forms if an accident or work-related health problem occurs in their department.

- Equipment and property within their area of responsibility is maintained in a safe, hazard-free condition.

All employees have a responsibility to themselves and to the company for their safety and the safety of their coworkers. In addition, all management personnel are obligated to insure employee safety by embracing a formal safety philosophy that is administered based on a commitment to safety. Appropriate training, workplace inspections, and equitable enforcement all constitute management involvement. All employees of Environmental Management are required to:

- Comply with all federal, state, and local rules and regulations relevant to their work.

- Observe all company rules and regulations related to the efficient and safe performance of their work.

- Integrate safety into each job function and live by this philosophy in the performance of job duties.

- Report or correct unsafe equipment and practices.

- Report any accidents that occur while on the job.

1.5 Disciplinary Policy

All established safety rules, procedures, and plans developed within the Health & Safety Plan are required to be followed. Upon violation of any company safety rule, the violating employee will be penalized. The list of possible disciplinary actions includes:

1.5.1 1st Offense - Verbal reprimand

An informal discussion of the incorrect behavior that should take place as soon as possible after the supervisor has knowledge of the safety misconduct. Verbal warning will be documented regarding issue and corrective measures. Documentation will be placed in the employee's personnel file. A duplicate or similar violation within a three (3) month period will result in a 2nd offense.

1.5.2 2nd Offense - Written reprimand

Employee will be counseled by his/her supervisor regarding the offense. Written warning with corrective measures will be acknowledged by the employee and will be placed in the employee's personnel file. A copy of documentation will be given to Environmental Management's President. A duplicate or similar violation within a three

(3) month period will result in a 3rd offense.

1.5.3 3rd Offense – Final Written Warning

Employee will be counseled by his/her supervisor regarding the offense. Final written warning will be acknowledged by the employee and will be placed in the employee's personnel file. A copy of documentation will be given to Environmental Management's President. Employee will lose paid days off benefit for a three (3) month period. Any violation by the employee during his/her duration of employment will result in immediate termination.

1.5.4 Immediate Termination

The following are examples of grounds for immediate termination:

A. Any violation of policy following a Final Written Warning

B. Breach of confidentiality regarding a client or personnel

C. Theft or deliberate destruction of Environmental Management property

D. Fighting on terminal property or an Environmental Management job-site

E. Carelessness which results in the severe injury to or death of an individual

F. Flagrant violation of Federal, State, or Local environmental policies

1.5.5 Violation of Company Safety Rules

Upon violation of any company safety rule, the violating employee will be penalized. The severity of the penalty will be in direct correlation to the severity of the safety violation. The following constitutes examples of safety related violations that would warrant various levels of disciplinary action. Under no circumstances should this list be considered as comprehensive. There will always be those infractions that must be considered on an individual basis.

A. Failure to adhere to established safety & health rules/regulations and policies

B. Failure to utilize assigned personal protective equipment

C. Horseplay in the work area

D. Failure to attend required training sessions

E. Fragrant violations of Federal, State or Local laws/regulations

F. Any other actions that might compromise the employee's safety or the safety of a co-worker

1.1 Purpose

In order to establish and organize good safety policies and procedures, this General Safety Policies and Procedures Plan summarizes information regarding safety policies and procedures at Environmental Management. The Health & Safety Officer is responsible for implementing and updating this plan. The plan is kept in the health & safety database.

1.2 Environmental Management Safety Philosophy Statement

Environmental Management's safety philosophy has been developed to reflect and communicate the proactive safety attitude maintained within the company.

The company will comply with appropriate safety and security laws and regulations such as those established by:

* The Occupational Safety and Health Act (OSHA)

* The EPA (Environmental Protection Agency)

* The DOT (Department of Transportation)

* All other applicable federal, state, and local safety and health regulations

In addition, our corporate safety philosophy includes the following vision statements:

We believe that the safety of employees is of utmost importance, along with quality, environmental services, and cost-control. Maintenance of safe operating procedures at all times is of both monetary and human value, with the human value being far greater to the employer, the employee, and the community. The following principles support this philosophy:

- All injuries and accidents are preventable through establishment and compliance with safe work procedures.

- The prevention of bodily injury and safeguarding of health are the first considerations in all workplace actions and are the responsibility of every employee at every level.

- Written safety plans describing the safe work practices and procedures to be practiced in all workplace actions are an essential element of the overall workplace safety program. All employees at every level are responsible for knowing and following the safety practices described in the written safety plans.

- Off the job, all employees should be similarly safe and demonstrate awareness of potential hazards.

1.3 Environmental Management Written Safety Plans

Because we care about our employees and strive to provide a safe work place, we have put into place a number of written safety plans. These written plans provide guidance and direction for the safety issues they cover. The topics covered in written safety plans at this company include the following:

Asbestos
Benzene
Bloodborne Pathogens
Confined Space
Electrical Safety
Emergency Response Plan
Fall Protection
Fire Protection
First/Aid CPR
Forklift Operations
Hydrogen Sulfide
Hazardous Materials Communications
HAZWOPER (Emergency Response)
HAZWOPER (RCRA)
Heavy Metals (Lead, Cadmium, Mercury, etc)
Lockout/Tagout
Noise (Hearing Conservation)
Personal Protective Equipment
Respiratory Protection Program
SPCC Plan
Trenching/Shoring/Excavation
Welding, Cutting, Hot Work

1.4 Employer/Employee Responsibilities

This section lists responsibilities of employers and employees. These responsibilities are to be taken seriously at all times.

It is the policy of this company to provide a place of employment reasonably free from hazards, which may cause illness, injury, or death to employees. It is also this company's policy to establish an effective and continuous safety program incorporating educational and monitoring procedures maintained to teach safety, correct deficiencies, and provide a safe, clean working environment. All company supervisors, managers, directors, and officers are responsible for the enforcement of safety policies and practices. They must ensure that:

- Their staff members are trained in appropriate safety procedures, including chemical-specific training as required. Individual safety files are maintained in Personnel for all associates.

- They notify the Health & Safety Officer, and complete the necessary forms if an accident or work-related health problem occurs in their department.

Volume 2

DISCIPLINARY POLICIES/PROCEDURES PLAN

Environmental
MANAGEMENT

2013

1.1 Purpose

In order to establish and organize good safety policies and procedures, this General Safety Policies and Procedures Plan summarizes information regarding safety policies and procedures at Environmental Management. The Health & Safety Officer is responsible for implementing and updating this plan. The plan is kept in the health & safety database.

1.2 Environmental Management Safety Philosophy Statement

Environmental Management's safety philosophy has been developed to reflect and communicate the proactive safety attitude maintained within the company.

The company will comply with appropriate safety and security laws and regulations such as those established by:

* The Occupational Safety and Health Act (OSHA)

* The EPA (Environmental Protection Agency)

* The DOT (Department of Transportation)

* All other applicable federal, state, and local safety and health regulations

In addition, our corporate safety philosophy includes the following vision statements:

We believe that the safety of employees is of utmost importance, along with quality, environmental services, and cost-control. Maintenance of safe operating procedures at all times is of both monetary and human value, with the human value being far greater to the employer, the employee, and the community. The following principles support this philosophy:

- All injuries and accidents are preventable through establishment and compliance with safe work procedures.

- The prevention of bodily injury and safeguarding of health are the first considerations in all workplace actions and are the responsibility of every employee at every level.

- Written safety plans describing the safe work practices and procedures to be practiced in all workplace actions are an essential element of the overall workplace safety program. All employees at every level are responsible for knowing and following the safety practices described in the written safety plans.

- Off the job, all employees should be similarly safe and demonstrate awareness of potential hazards.

1.3 Environmental Management Written Safety Plans

Because we care about our employees and strive to provide a safe work place, we have put into place a number of written safety plans. These written plans provide guidance and direction for the safety issues they cover. The topics covered in written safety plans at this company include the following:

Asbestos	Benzene
Bloodborne Pathogens	Cadium Awareness
Confined Space	Electrical Safety
Emergency Response Plan	Fall Protection
Fire Protection	First/Aid CPR
Forklift Operations	General Waste Management
Grounding Conductor	Hand and Power Tool Safety
Hydrogen Sulfide	Hazardous Materials Communications
HAZWOPER	Ladder Safety
Lead Awareness	Lifting/Mobile Equipment
Lockout/Tagout	Noise (Hearing Conservation)
Personal Protective Equipment	Respiratory Protection Program
Sandblasting	Scaffolds (user only)
Short-Service Employee Program	Spill Prevention
Trenching/Shoring/Excavation	Welding/Cutting/ Hot work

1.4 Employer/Employee Responsibilities

This section lists responsibilities of employers and employees. These responsibilities are to be taken seriously at all times.

It is the policy of this company to provide a place of employment reasonably free from hazards, which may cause illness, injury, or death to employees. It is also this company's policy to establish an effective and continuous safety program incorporating educational and monitoring procedures maintained to teach safety, correct deficiencies, and provide a safe, clean working environment. All company supervisors, managers, directors, and officers are responsible for the enforcement of safety policies and practices. They must ensure that:

- Their staff members are trained in appropriate safety procedures, including chemical-specific training as required. Individual safety files are maintained in Personnel for all associates.

- They notify the Health & Safety Officer, and complete the necessary forms if an accident or work-related health problem occurs in their department.

- Equipment and property within their area of responsibility is maintained in a safe, hazard-free condition.

- The Health and Safety Officer conducts workplace safety inspections at the terminal.

All employees have a responsibility to themselves and to the company for their safety and the safety of their coworkers. In addition, all management personnel are obligated to insure employee safety by embracing a formal safety philosophy that is administered based on a commitment to safety. Appropriate training, workplace inspections, and equitable enforcement all constitute management involvement. All employees of Environmental Management are required to:

- Comply with all federal, state, and local rules and regulations relevant to their work.

- Observe all company rules and regulations related to the efficient and safe performance of their work.

- Integrate safety into each job function and live by this philosophy in the performance of job duties.

- Report or correct unsafe equipment and practices.

- Report any accidents that occur while on the job.

1.5 Violation of Company Safety Rules

Upon violation of any company safety rule, the violating employee will be penalized. The severity of the penalty will be in direct correlation to the severity of the safety violation. The following constitutes examples of safety related violations that would warrant various levels of disciplinary action. Under no circumstances should this list be considered as comprehensive. There will always be those infractions that must be considered on an individual basis.

A. Failure to adhere to established safety & health rules/regulations and

policies

B. Failure to utilize assigned personal protective equipment

C. Horseplay in the work area

D. Failure to attend required training sessions

E. Fragrant violations of Federal, State or Local laws/regulations

F. Any other actions that might compromise the employee's safety or the

safety of a co-worker

1.6 Discipline Policy

Environmental Management (E.M.I.) has adopted a progressive discipline policy to identify and address employee and employment related problems. This policy applies to any and all employee conduct that the company determines must be addressed by discipline. No discipline policy can be expected to address each and every situation requiring corrective action that may arise in the workplace; therefore, the company takes a comprehensive approach regarding discipline and will attempt to consider all relevant factors before making decisions regarding discipline. Ultimately, the company management team will be responsible for determining the need for any disciplinary action and for administering any corrective actions.

Environmental Management will strive to adhere to the following progressive disciplinary process:

1st Offense – Verbal Warning

- The employee will be verbally warned of the violation by a member of the management team, Manger or Coordinator or Supervisor Personnel
- A Disciplinary Action form will be filled out to document the offense and any corrective measures taken
- The corrective action can result in the assignment of additional duties related to the infraction
- The Disciplinary Action form will be placed in employee's personnel file
- A duplicate or similar violation within a twelve (12) month period will result in a 2nd Offense
- Based on the severity of the incident a more Harsh Action may be taken by the Management Team

2nd Offense – Written Warning

- The employee will be counseled by a member of the management team regarding the second offense
- A Disciplinary Action form will be filled out and acknowledged by the employee to document the offense and any corrective measures taken
- The corrective action can result in up to three days unpaid suspension and assignment of additional duties related to the infraction
- The Disciplinary Action form will be placed in employee's personnel file and a copy will also be given to the employee
- A duplicate or similar violation within a twelve (12) month period dated from the start of the 2nd violation will result in a 3rd Offense
- Based on the severity of the incident a more Harsh Action may be taken by the Management Team

3rd Offense – Final Written Warning

- The employee will be counseled by a member of the management team regarding the third offense
- A Disciplinary Action form will be filled out and acknowledged by the employee to document the offense and any corrective measures taken
- The corrective action can result in up to five days unpaid suspension and assignment of additional duties related to the infraction
- The Disciplinary Action form will be placed in employee's personnel file and a copy will also be given to the employee
- A duplicate or similar violation within a twelve (12) month period dated from the start of the 3rd violation will result in *immediate termination*
- Any duplicate or similar violation occurrence by the employee during his/her duration of employment will result in immediate escalation to the 3rd offense level

Immediate Termination – The following are examples of grounds for immediate termination:

- Any violation of policy following a Final Written Warning for a 12 month period
- Any violation of the company drug and alcohol policy
- Breach of confidentiality regarding a client or personnel
- Carelessness which results in the severe injury to or death of an individual
- Fighting on terminal property or on a E.M.I. job-site
- Flagrant violation of Federal, State or Local Environment Policies
- Theft or deliberate destruction of E.M.I. property

Again, while Environmental Management will generally take disciplinary action in a progressive manner, it reserves the right, in its sole discretion, to decide whether and what disciplinary action will be taken in a given situation.

Approved 2/1/00

Revised 2/2/12

ELECTRICAL PROTECTION PROGRAM

Environmental
MANAGEMENT

2016

1.1 General Company Policy

The purpose of this program is to inform all interested persons, including employees, that Environmental Management is complying with the OSHA Electrical Safety Standard, Title 29 Code of Federal Regulations 1910.333 by determining that this workplace needs written procedures for preventing electric shock or other injuries resulting from direct/indirect electrical contacts to employees working on or near energized or de-energized parts. This program applies to all work operations at Environmental Management where employees may be exposed to live circuits and/or those circuits that have been de-energized.

The Health & Safety Officer has overall responsibility for coordinating health and safety programs in this company. The Health & Safety Officer is the person having overall responsibility for the Electrical Safety Program. The Health & Safety Officer will review and update the program, as necessary. Copies of the written program may be obtained from a supervisor, the Safety Officer, the main office library or the electronic version in the Health & Safety Database. Under this program, our employees receive instructions in the purpose and use of energy control procedures, as well as the other required elements of the Control of Hazardous Energy standard (Lock-Out Tag-Out 29 CFR 1910.147). This instruction includes the de-energizing of equipment, applying locks and tags, verifying de-energization, and equipment re-energizing.

If, after reading this program, you find that improvements can be made, please contact your immediate supervisor or the Health & Safety Officer. We encourage all suggestions because we are committed to creating a safe workplace for all our employees and a successful electrical safety program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

1.2 Hazard Analysis Report

To determine the locations that shall be addressed by the Electrical Safety Program the Health and Safety Officer has conducted a hazard analysis of the workplace. The hazard analysis can be located in Appendix A of this document. The hazard analysis has provided valuable information that identifies those locations that have equipment using electricity, various types of wiring installations, and the types of employee functions that must be covered by the Electrical Safety Program. The following locations have been identified as having electrically operated equipment and/or wiring installations that must be de-energized before maintenance is performed. Due to the design, location (i.e., no confined space locations) and engineered protection on the following equipment there are no clearance/protective distance requirements or minimum illumination levels necessary to provide adequate safety for unqualified employees.

* South Gate

* Shop air compressor

* Roll-off Compactor

* Fuel Pumps

Employees of our company who are qualified to work on, near, or with energized electric circuits and equipment are the Terminal Manager and the Maintenance Manager.

Employees working on, near, or with energized electric circuits and equipment who have limited knowledge of electrical circuitry are all other employees.

1.3 Training Program

Every employee at Environmental Management who faces the risk of electric shock from working on or near energized or de-energized electrical sources receives training in electrical related safety work practices pertaining to the individual's job assignment.

The goal of our electrical safety-training program is to ensure that all employees understand the hazards associated with electrical energy and that they are capable of performing the necessary steps to protect themselves and their co-workers. All exposed de-energized electrical parts will be treated as live.

Our electrical training program covers these basic elements:

* Lock-Out and tagging of conductors and electrical equipment

* Safe procedures for de-energizing circuits and equipment

* Application of locks and tags

* Verification that the equipment has been de-energized

* Procedures for re-energizing the circuits or equipment

* Working near overhead or underground electrical lines

* Personal Protective Equipment selection and use

* Apparel prohibitions (e.g., watches, rings, necklaces and other conductive items)

* Other electrically related information which is necessary for employee safety

In our facility, all the persons working on or near energized or de-energized electric sources are considered "qualified" to work safely with electrical energy and have received the appropriate training and certification to do so. In addition to the basic training elements, our "qualified" employees are trained in the skills and techniques necessary to identify exposed live parts, determine nominal voltages, and clearance distances and corresponding voltages. This group of employees has also received additional training that includes The Control of Hazardous Energy (Lock-out Tag-out) 29 CFR 1910.147.

The format we follow for our training program is communication of this plan and training in accordance with The Control of Hazardous Energy (Lock-out Tag-out) 29 CFR 1910.147.

The procedures we follow when training new employees who will be working on or near electrical equipment or circuitry are awareness training utilizing a facility orientation and the formal program as previously outlined. When changes involving electrical elements occur employees are provided additional training to ensure the safety of all affected workers.

The Training Officer has overall responsibility to conduct the electrical safety training for all employees. Every employee who participates in the Electrical Safety Program receives a certificate which they sign verifying that they have completed the course, that they understand the information presented, and that they will follow all company policies and procedures regarding electrical safety. These signed certificates of training as well as all training materials and documentation are kept by the Technical Support Analyst and maintained in the employee's training file.

In many cases it is necessary to identify and evaluate potential hazards in the field. When these hazards are identified they shall be communicated to all effected employees on the "Site Specific Health and Safety Plan." The following hazards shall be addressed as prescribed and training provided before any work is performed.

1.3.1 Overhead Lines

When work is performed near overhead energized lines the lines shall be de-energized , grounded, isolated, guarded or insulated as determined by a qualified person. Unqualified employees of Environmental Management are prohibited from performing this type of work. Spotters shall be utilized when any equipment is operated near overhead lines.

1.3.2 Unqualified Employee Safety Distances

All work performed by unqualified personnel on elevated locations near overhead lines shall maintain appropriate distances from live circuits. The following distances shall be observed at all times.

50kV or less.....10 feet *Note: This distance applies to workers on the ground also.*

Over 50 kV.....10 feet plus 4" for every 10kV over 50kV

1.3.3 Qualified Employee Distances

Qualified persons must adhere to all approach distances in 29 CFR 1910.333 (c)(3) (ii)-Table-5. Please see table below

Voltage range (phase to phase)	Minimum approach distance
300V and less	Avoid Contact
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm).

Over 750V, not over 2kV .....| 1 ft. 6 in. (46 cm).

Over 2kV, not over 15kV .....| 2 ft. 0 in. (61 cm).

Over 15kV, not over 37kV .....| 3 ft. 0 in. (91 cm).

Over 37kV, not over 87.5kV .....| 3 ft. 6 in. (107 cm).

Over 87.5kV, not over 121kV .....| 4 ft. 0 in. (122 cm).

Over 121kV, not over 140kV .....| 4 ft. 6 in. (137 cm).

1.3.4 Vehicles and Other Equipment

All vehicles and equipment with elevation capability shall adhere to the safe distances as stated above. When elevated structures are lowered and a spotter is used, the distance may be reduced to 4 feet. For additional information refer to 29 CFR 1910.333(c)(3)(iii)(A).

1.4 Lock-Out and Tagging Program

It is Environmental Management policy that circuits and equipment must be disconnected from all electric energy sources before work on them begins. We use lock-out and tagging devices to prevent the accidental re-energization of this equipment. These lock-out and tagging procedures are the main component of our electrical safety program. The safety procedures that make up our lock-out and tagging program can be located in the Lock-Out/Tag-Out Health and Safety Plan.

De-energizing circuits and equipment. We disconnect the circuits and equipment to be worked on from all electric energy sources and we release stored energy that could accidentally re-energize equipment. Environmental Management will also provide protective shields, protective barriers or insulating materials as necessary. They shall be used when working in confined or enclosed work spaces where electrical hazards may exist.

1.4.1 Application of locks and tags

Only authorized employees are allowed to place a lock and tag on equipment required to be de-energized before work begins. Our locks prevent unauthorized persons from re-energizing the equipment or circuits and the tags prohibit unauthorized operation of the disconnecting device.

1.4.2. Verification of de-energized condition of circuits and equipment

Prior to work on the equipment, we require that a "qualified" employee verify that the equipment is de-energized and cannot be restarted. Although, when working on or near exposed deenergized parts they are treated as live.

1.4.3 Re-energizing circuits and equipment

Before circuits or equipment are reenergized, the following steps must be performed:

A. A "qualified" employee conducts tests and verifies that all tools and devices have been removed.

B. All exposed employees are warned to stay clear of circuits and equipment.

C. Authorized employees remove their own locks and tags.

D. We do a visual inspection of the area to be sure all employees are clear of the circuits and equipment.

The Terminal Manager and Maintenance Supervisor are the persons trained and authorized to de-energize, verify, and re-energize electric circuits and equipment in our company.

1.5 Enforcement

Constant awareness of and respect for electrical hazards, and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety and Personnel Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.

A copy of the OSHA Standard 29 CFR 1910.332-333 and 1910.147 are included in this document and can be found in Appendix B.

Appendix A

Hazard Analysis

Those hazardous locations at the Environmental Management facility that require lock-out/tag-out procedures have been previously identified and specific safety applications outlined. In addition, 29 CFR 1910.333 requires that the following hazards be addressed when there is the possibility of employee contact.

1. All electrical installations at the facility are underground. Work around overhead lines during client responses shall be addressed in the Site Specific Safety and Health Plan for that particular project.

2. There are no energized electrical sources that require minimum approach distances at the Environmental Management facility. Such application at a client facility shall be addressed in the Site Specific Health and Safety Plan for that project.

3. Clearance distances for vehicles and other equipment shall be maintained from energized electrical sources at the Environmental Management facility utilizing existing transportation routes. Adherence to client policy and procedures regarding vehicular clearance distance shall be observed and communicated in the Site Specific Safety and Health Plan.

4. All energized electrical sources at the Environmental Management Facility are located in areas with adequate illumination. Off-site projects shall be evaluated and proper illumination levels shall be maintained and communicated on the Site Specific Safety and Health Plan for each project.

5. When entering a Permit Required Confined Space all affected employees shall follow the procedures outlined in the Environmental Management Safety and Health Plan and in accordance with 29 CFR 1910.146 (Permit Required Confined Space Standard) and 29 CFR 1910.147 Lock-out/ (Tag-out Standard).

6. When working in and around energized circuits near conductive objects such as pipes, ducts, and structural members appropriate precautions shall be observed and all procedures outlined in the Safety and Health Plan shall be utilized. Non-conductive ladders and accessories shall be used when in close proximity to live circuits.

7. All jewelry except for wedding bands shall not be worn in an environment where an electric shock might occur. Additional requirements for proper apparel must be addressed in the Site Specific Safety and Health Plan or customer/client policies.

South Gate

The south gate contains energized electrical systems and moving parts. The electrical system must be de-energized before maintenance is performed, utilizing the requirements of the Lock-Out/Tag-Out procedures established by Environmental Management and in accordance with 29 CFR 1910.147.

Shop Air Compressor

The shop air compressor includes a hard wired system that must be de-energized before maintenance is performed. All Environmental Management Lock-Out/Tag-Out procedures must be adhered to during the maintenance of the compressor.

Roll Off Compactor

The roll off compactor includes a hard wired system that must be de-energized before maintenance is performed. All Environmental Management Lock-Out/Tag-Out procedures must be adhered to during the maintenance of the compressor.

Fuel Pumps

The fuel pumps include a hard wired system that must be de-energized at the breaker panel adjacent to the pumps.

Appendix B

29 CFR 1910.332-333 And 1910.147

FALL PROTECTION

Environmental
MANAGEMENT

2016

1.1 Purpose

Written fall protection procedures establish guidelines to be followed whenever an employee of Environmental Management works on ladders, tanks, raised platforms and scaffolds at heights six feet (6') or greater, or whenever fall protection equipment is required. This rule has been established to provide both authorized and affected employees the necessary guidelines needed to work safely in those areas requiring fall protection. The intent of the plan is to:

* Provide a safe working environment

* Establish minimum requirements related to fall protection policies and procedures

* Identify PPE and equipment requirements

The effectiveness of the written fall protection program depends upon the active support and involvement of all employees who work in those areas requiring fall protection awareness. This written plan is intended to be used in implementing procedures to ensure that work with fall protection is carried out safely to minimize the possibility of injury or harm to our employees.

These written fall protection procedures establish uniform requirements designed to ensure that fall protection training, operation, and practices are communicated to and understood by both authorized and the affected employee. These requirements are also designed to ensure that procedures are in place to safeguard the health and safety of all employees.

It is the policy of Environmental Management to permit only employees trained in fall protection procedures to work in areas where fall hazards could occur. These safeguards reduce the likelihood of fall accidents and help to ensure a safe workplace.

1.2 Administrative Duties

The Environmental Management Safety Officer is responsible for developing and maintaining this written Fall Protection Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan. The Environmental Management Safety Officer is also qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer and oversee our fall protection plan and conduct the required evaluations of plan effectiveness.

If, after reading this plan, you find that improvements can be made, please contact your immediate supervisor or the Safety Officer. We encourage all suggestions because we are committed to creating a safe workplace for all our employees and a safe and effective fall protection program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

1.3 List of Affected Areas

The following table lists all areas with fall hazards, the type of fall hazard in the area, and the employees who are affected by the fall hazard:

Area/Department	Type of Fall Hazard (ladders, stairs, etc.)	Employees Affected (by name or by position)
Shop & Maintenance Area	Ladders, stairs, platforms, oil change pit	Vehicle maintenance, field technicians, office and support personnel
Non-Hazardous Dock	Ladders, stairs, raised platforms & tanks	All employees authorized to work on dock
Hazardous	Ladders, raised platforms	All employees authorized to work on dock
Damaged Freight Dock	Ladders, raised platforms	All employees authorized to work on dock
Storage tanks	Ladders, raised platforms, walkways	All employees authorized to work on or near storage tanks

1.4 Pre-Work Safety Inspection

Prior to beginning work in any area or on any structure where fall hazards exist, a Pre-Work Safety Inspection must be completed that includes the following items:

1.4.1 Stairs

A. All required covers or guardrails must be in place

B. All handrails or guardrails are in place on stairways

C. All treads and risers on stairs are in good repair

D. Non-slip surfaces are in place on stairs

E. All stairs meet OSHA and ANSI specifications for design and safety

1.4.2 Ladders

A. Gripping safety feet in place and secure on ladders

B. All parts and fittings on ladders are secure

C. Non-slip surfaces are in place on ladder rungs

D. When setting ladder up, footing of ladder is secure on a firm, level, and non-skid surface and top of ladder is placed against a solid, stationary object

E. All ladders meet OSHA specifications for design and safety

1.4.3 Loading Dock Areas

A. Dock blocks are up and in place when dock is not in immediate use

B. Only trained individuals shall perform loading and unloading duties on docks

C. Chock blocks shall be used on all freight containers

1.4.4 Platforms

A. Guardrails are in place and securely attached

B. Toeboards are in place and secure

C. All platforms meet OSHA specifications for design and safety

D. Anchor points have been established when fall protection devices are required

1.4.5 Floor & Wall Openings

A. All floor and wall openings are safely covered or blocked from access

B. If not safely covered and blocked from access, the opening has someone assigned for constant attendance to it

C. Tank entries and confined space activities shall be performed in accordance with 29 CFR 1910.146

1.4.6 Equipment/PPE selection

All fall protection equipment e.g., Harnesses, lanyards, snaphooks, connectors arrest devices, and other components shall meet the minimum criteria established by OSHA, ANSI and NIOSH.

1.5 Work Procedures

If any one of the conditions described in Pre-Work Safety Inspection is not met for the area or piece of equipment posing a potential fall hazard, then employees may not perform that work until the condition is met. If the condition cannot be remedied immediately, a supervisor must be notified of the problem. In accordance with 29 CFR 1926.502 (h) a competent person (Safety Officer or Attendant), acting as a safety monitor shall be utilized in those areas where conventional fall protection would be infeasible or pose a greater hazard to employees. The designated person shall comply with the following requirements:

* Be competent to recognize fall hazards.

* Be capable of warning the employee when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner.

* Remain on the same walking or working surface and maintain visual surveillance on the employee(s) being monitored.

* Maintain a distance that would allow oral communication between the monitor and the employee and perform no distracting functions that would impede effectiveness.

If the situation calls for use of fall protection devices such as harnesses, lanyards and other fall arrest devices in those areas where the fall hazard cannot be reduced to a safe level, then the employee must don such protective equipment before beginning the work and use it as intended throughout the duration of the work.

The following procedures in our company require the use of such protective equipment:

* All unguarded platforms 4' or higher

* All entries into vertical tank spaces greater than 5' deep

* All other activities that are 6' or greater in height and require fall arrest devices

* Excavations 5'or deeper

This plan addresses and is applicable not only to those locations that have been currently identified at the Environmental Management Facility, but also to all locations encountered in field activities or on client facilities. Environmental Management shall incorporate all elements of the Fall Protection Plan with the client's existing plans.

Due to the inability to characterize all off-site applications, there exists the possibility of encountering various locations where conventional fall protection methodologies are inadequate. When these locations are identified and conventional fall protection methods cannot be used the location must be classified as a "controlled access zone". Due to the complexity and variety of applications that would require the establishment of a "controlled access zone" the OSHA standard must be utilized to determine appropriate actions based on job function. The following OSHA citations shall be used to assist the competent person in making those determinations. 29 CFR 1926.501 (b) (9), 29 CFR 1926.502 (g), 29 CFR 1926.502 (k)

To prevent slipping, tripping, and falling, all places of employment, passageways, storerooms, and service rooms must be kept clean and orderly and in a sanitary condition. The floor of every workroom will be maintained in a clean and, so far as possible, dry condition. Where wet processes are used, drainage will be maintained and false floors, platforms, mats, or other dry standing places are provided where practical.

To facilitate cleaning, every floor, working place and passageway will be kept free from protruding nails, splinters, holes, or loose boards.

The Environmental Management training program includes those individuals who have the potential to be exposed to fall hazards. The program shall enable each employee to recognize the hazards of falling and training in procedures shall be accomplished to reduce or eliminate these

hazards.

The following employees at our company are trained and authorized to perform such work:

Employee Name/Position	Department	Fall Protection Device
All field technicians, spill coordinators	Terminal Facility Field activities	Engineering controls, fall arrest devices e.g., lanyards, harnesses, ropes, etc.

1.6 Training Program

1.6.1 Under no circumstances will an employee work in areas of high fall hazards, perform work requiring fall protection devices, or use fall protection devices until he/she has successfully completed this company's fall protection program. This includes all new employees, regardless of claimed previous experience.

1.6.2 All employees shall receive training as necessary by a competent person consisting of the following topics:

A. The nature of fall hazards in the workplace

B. The correct procedures for erecting, maintaining, disassembling and inspecting fall protection systems and equipment

C. The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and any other protection deemed necessary

D. The employee's role within the fall protection program

E. The Fall Protection Standards 29 CFR 1926. 500-503, and 29 CFR 1910.23

1.6.3 Retraining of employees shall be accomplished when there is reason to believe that an employee who has already been trained has not retained the understanding and skills previously taught. The following circumstances require retaining of these employees:

A. Changes in workplace conditions or job functions

B. Changes in types of fall protection systems, equipment or devices

C. An employee has not retained requisite understanding or skills regardless of the reason

The Training Officer will identify all new employees in the Employee Orientation Program and make arrangements with department management to schedule the classroom instruction for those employees previously identified in this procedure.

1.7 Recordkeeping

1.7.1 All employee-training records are retained in the employee's personnel file and in the training database. The following elements are included in the record

A. The identity of the trainee

B. The date the training was provided

C. The specific subject matter that was presented

D. Signature of the person conducting the training

E. A certification signed by the employee receiving the training

1.8 Rescue Considerations

As required by 29 CFR 1926.502 (d) (20) all personnel who are required to perform job functions requiring fall arrest protection shall be afforded the necessary training, equipment and administrative controls to assure that all "Rescue Considerations" have been addressed. Environmental management will provide all necessary equipment i.e., ladders, tripods, descent/ ascent devices, etc to assist in both self-rescue and assisted rescue. In addition, all hazards shall be addressed on the site-safety and health plan, and all activities shall be performed utilizing a buddy-team" and /or "back-up team" concept.

1.9 Disciplinary Procedures

Constant awareness of and respect for fall protection procedures and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety and Personnel Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.

2.0 Program Evaluation

Although we may not be able to eliminate all problems, we try to eliminate as many as possible to improve employee protection and encourage employee safe practices. Therefore, the Environmental Management Safety Officer is responsible for evaluating and updating this written plan. The evaluation will include a review of reported accidents, as well as near misses, to identify areas where additional safety measures need to be taken.

The Environmental Management Safety Officer will also conduct a periodic review to determine the effectiveness of the program. This review may include:

* A walk-through of the facility, and

* Interviews with employees to determine whether they are familiar with the requirements of this program and if safety measures are being practiced

In the event of an employee fall or some other related serious incident including a near miss, an accident investigation into the circumstances surrounding the event shall be initiated to

determine if the fall protection plan requires revision (e.g. new practices, procedures, or training).

We have attached the following appendices to ensure better understanding of this written plan:

Appendix A OSHA Fall Protection Standard 29 CFR 1926.500,501.502 Appendix a-e

Appendix B OSHA Walking Working Surfaces 29 CFR 1910.23

Appendix C Annual Inspection Checklists

Appendix A

OSHA Fall Protection Standard 29 CFR 1926.500,501.502 (a-e)

Appendix B

OSHA Walking Working Surfaces 29 CFR 1910.23

Appendix C

Annual Inspection Checklists

FIRE PREVENTION PLAN

Environmental
MANAGEMENT

2004

1.1 Purpose

OSHA's Fire Prevention Plan, 29 CFR 1910.38(b), requires Environmental Management to have a written fire prevention plan (FPP). This plan applies to all operations in our company where employees may encounter a fire.

This Fire Prevention Plan (FPP) is in place to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire. This plan addresses the following issues:

* Major workplace fire hazards and their proper handling and storage procedures

* Potential ignition sources for fires and their control procedures

* The type of fire protection equipment or systems which can control or suppress a fire

* Regular job titles of personnel responsible for maintenance of equipment and systems installed to prevent or control ignition of fires and for control of fuel source hazards

Under this plan, our employees shall be informed of the plan's purpose, preferred means of reporting fires and other emergencies, types of evacuations to be used in various emergency situations, and the alarm system. The plan is closely tied to our Emergency Action Plan where procedures are described for emergency escape procedures and route assignments, procedures to account for all employees after emergency evacuation has been completed, and rescue and medical duties for those employees who perform them. Please see the Emergency Action Plan for this information.

The Health & Safety Officer is the Plan Coordinator, acting as the representative of the Terminal Manager, who has overall responsibility for the plan. The written plan is kept in the Health & Safety database and shall be reviewed and updated as necessary. Copies of this plan may be obtained from an immediate supervisor or the Health & Safety database

The FPP communicates to employees the policies and procedures to follow when fires erupt. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.

If after reading this plan, you find that improvements can be made, please contact the Plan Coordinator. We encourage all suggestions because we are committed to the success of our Fire Prevention Plan. We strive for clear understanding, safe behavior, and involvement in the plan from every level of the company.

1.2 Plan Coordinator Responsibilities

The Environmental Management Plan Coordinator is responsible for managing the following activities.

* Develop a written Fire Prevention Plan for regular and after-hours work conditions.

* Immediately notify the Guthrie fire or police departments, in the event of a fire affecting facility.

* Integrate the FPP with the existing general emergency plan covering all facility locations.

* Distribute procedures for reporting a fire, the location of fire exits, and evacuation routes of each employee.

* Conduct drills to acquaint the employees with fire procedures, and to judge their effectiveness.

* Satisfy all local fire codes and regulations as specified.

* Train designated employees in the use of fire extinguishers and the application of medical first-aid techniques.

* Keep key management personnel home telephone numbers in a safe place in the facility for immediate use in the event of a fire. Distribute a copy of the list to key persons to be retained in their homes for use in communicating a fire occurring during non-work hours.

* Decide to have employees and non-employees remain in or evacuate the facility in the event of a fire.

* If evacuation is deemed necessary, the Plan Coordinator ensures that:

A. All employees are notified and evacuated and a head count is taken to confirm total evacuation of all employees

B. All notification/alarm systems are functioning properly

C. When practical, equipment is placed and locked in storage rooms or desks for protection

D. All employees understand their roles and/or responsibilities during an evacuation

E. Review and update the fire prevention plan

1.3 Management Responsibilities

* Ensure all fire prevention programs are established and enforced

* Ensure that all detection/notification/alarm systems are installed, inspected and maintained

* Ensure that all fire suppression systems (fire extinguishers) are installed, inspected and maintained

1.4 Supervisor Responsibilities

* Closely monitor the use of all flammable or combustible materials

* Provide training to employees in the safe storage, use, and handling of flammable or combustible materials

1.5 Employee Responsibilities

* Use, store and transfer flammable and combustible materials in accordance with company protocol and training

* Immediately report any variations or violations to immediate supervisor

1.6 Fire Hazards

Fire can be represented by a simple equation: Fire = Ignition Source + Fuel + Oxygen. Without any one of these three elements, a fire cannot start. Likewise, during a fire, if you take away any one of these three elements, you can successfully extinguish a fire. Prevention is a practical approach to reduce or eliminate the potential for fire in the workplace based on these simple fire physics.

Fire prevention measures must be developed for all fire hazards. Once employees are made aware of the hazards in their work areas they must be trained in the fire prevention measures developed, and adhere to those procedures during work activities. Large accumulations of flammable or combustible materials can contribute to large fires, and dense smoke that contains numerous toxic by-products of combustion. Some materials are also capable of spontaneous combustion. Matches, improper use of smoking materials, sparks from welding or cutting operations and other low-level ignition sources must be managed. The following procedures are to be utilized to reduce or eliminate the potential for fire in the workplace:

Keep all flammable or combustibles substances away from ignition sources.

Develop good housekeeping practices to insure separation of trash and debris from ignition sources.

Maintain proper segregation between reactive or incompatible chemicals.

1.6.1 Potential Ignition Sources

All nonessential ignition sources must be eliminated where flammable liquids, gases and solids are used or stored. Substances that pose a potential fire hazard should be properly stored a safe distance away from ignition sources in approved containers and in approved cabinets. The following is a list of the most common ignition sources found in the workplace:

A. Open flames, such as cutting and welding torches, furnaces or heaters, matches/lighters

B. Non approved electrical sources, i.e. motors, switches, circuit breakers, etc.

C. Mechanical sparks produced by tools and friction

D. Static energy, (sparks, arcs)

The following procedures are to be utilized to reduce or eliminate potential ignition sources.

A. Only approved electrical equipment shall be installed in areas that contain flammable gases or vapors. All components shall be inspected on a routine basis.

B. All open flames are prohibited in areas containing flammable gases or vapors

C. Hot permits must be used for welding, cutting and grinding operations

D. Non-sparking tools shall be used in areas containing flammable gases or vapors

E. Bonding and grounding shall be performed when transferring all flammable liquids

1.6.2 Removal of Incompatibles

Materials that can contribute to a flammable liquid fire should not be stored with flammable liquids. Examples are oxidizers and organic peroxides, which, upon decomposition, can generate large amounts of oxygen.

1.6.3 Flammable Gases

Flammable gases generally pose the same type of fire hazards as flammable liquids and their vapors. Many of the safeguards for flammable liquids shall also apply to flammable gases, however, other properties such as toxicity, reactivity, and corrosivity must also be taken into account. In addition, a gas that is flammable could be capable of producing toxic combustion products.

1.6.4 Fuel Hazards

Fuel is used throughout the Environmental Management facility as an energy source for various systems or equipment. This fuel can be a significant fire hazard and must be monitored and controlled. The Operations Manager shall be responsible for the control of fuel hazards.

1.7 Fire Protection Equipment (Extinguishers)

A fire extinguisher is very effective when used while the fire is in the incipient stages. The use of a fire extinguisher that matches the class of fire, by a person who is well trained in its use, can save both lives and property. The successful performance of a fire extinguisher in an emergency situation largely depends on its proper selection, inspection, maintenance and distribution.

1.7.1 Classification of Fires

Classifications of fires are divided into four categories depending on the type of materials or fuel involved. The type of fire shall determine the type of extinguisher that should be used to extinguish it. Extinguishers should be selected according to the potential fire hazard, the construction and occupancy of facilities, hazards to be protected, and other factors pertinent to the situation. The following examples outline the types of fires and the types of extinguishers that should be used.

A. Class A – Fires involving materials such as wood, paper, and cloth which produce glowing embers or char.

B. Class B – Fires involving flammable gases, liquids, and greases (including gasoline and most hydrocarbon liquids) which must be vaporized for combustion

to occur.

C. Class C – Fires involving live electrical equipment or materials near electrically powered equipment.

D. Class D – Fires involving combustible metals, such as magnesium, zirconium, potassium, and sodium.

1.7.2 Locations and Marking of Extinguishers

A. Extinguishers shall be conspicuously located and readily accessible for immediate use in the event of a fire. They will be located along normal paths of travel and egress. Wall recesses and flush mounted cabinets will be used as extinguisher locations wherever possible.

B. Extinguishers will be clearly visible. In locations where visual obstruction cannot be completely avoided, directional arrows will be provided to indicate the location of the extinguisher. Portable fire extinguishers shall be installed at various locations within the facility regardless of other fire fighting measures.

1.7.3. Mounting and Distribution of Extinguishers

A. Extinguishers shall be installed on hangars, brackets or in cabinets or on shelves. Extinguishers having a gross weight not exceeding 40 pounds will be installed so that the top of the extinguisher is not more than 3 ½ feet above the floor.

B. Extinguishers mounted in cabinets or wall recesses, or set on shelves, will be placed so that the extinguisher operating instructions face outward. The location of such extinguishers will be made conspicuous by marking the cabinet or wall recess in a contrasting color that will distinguish it from the normal door.

C. Extinguishers shall be distributed in such a way that the amount of time needed to travel to their location and back to the fire does not allow the fire to get out of control. OSHA requires that the travel distance for Class A and Class D extinguishers not exceed 75 feet. The maximum travel distance for Class B extinguishers is 50 feet. There is no maximum travel distance specified for Class C extinguishers, but they must be distributed on the basis of appropriate patterns for Class A and Class B hazards.

1.7.4 Inspection and Maintenance

Once hazards have been evaluated and the equipment is installed to control those hazards, that equipment must be monitored on a regular basis to ensure it continues to function properly. It shall be the responsibility of the Environmental Management Safety Officer to oversee the inspection, maintenance, and testing of fire extinguishers to ensure that they are in proper working condition and have not been tampered with or physically damaged.

Extinguishers shall be visually inspected on a monthly basis in accordance with 29 CFR 1910.157 (e),(2).

Extinguishers shall be inspected on an annual basis in accordance with 29 CFR 1910.157 (e),(3).

1.7.5 Fire Safety Inspections/Housekeeping

Supervisors and Site Safety personnel are responsible for conducting work site surveys that include observations of compliance with the Fire Safety Program. These surveys should include observations of work site safety and housekeeping issues and should specifically address proper storage of chemicals and supplies, unobstructed access to fire extinguishers, and emergency evacuation routes. It should also be determined if an emergency evacuation plan is present in work areas and that personnel are familiar with the plan.

1.8 Emergency Exits

Each emergency exit will be clearly visible, or the route to it conspicuously identified in such a manner that every occupant of the building will readily know the direction of escape from any point. At no time will emergency exits be blocked.

Any doorway or passageway which is not an exit or access to an exit but which may be mistaken for an exit, will be identified by a sign reading "NOT AN EXIT", a sign indicating its actual use (i.e. storeroom), or other sign indicating the route of exit to be taken. A readily visible sign will mark exits and accesses to exits. Each exit sign (other than internally illuminated signs) will be illuminated by a reliable light source providing not less than 5 foot candles on the illuminated surface.

1.8.1 Emergency Plan for Persons with Disabilities

Supervisors are assigned the responsibility to assist persons with disabilities (PWD) under their direct supervision. The supervisor or designee will assist with the evacuation or assure that the PWD is removed from danger. In addition, the following guidelines shall be followed:

A. Supervisors, alternates and the person with the disability will be trained on available escape routes and methods.

B. A list of persons with disabilities employed at Environmental Management shall be kept in the personnel office.

C. Visitors who have disabilities will be assisted in a manner similar to that of company employees. The host of the visiting person will assist with their evacuation.

1.9 Placarding

Environmental Management shall post signs based on the National Fire Protection Association's (NFPA) standard system for identifying the fire hazards of chemicals based on NFPA Standard 704-1985 on each building where a significant amount of hazardous chemicals as defined in OS 380:45-5 are located. Environmental Management shall not need to comply with the sign posting requirements of 380:45-5-3(a)(2) if the building, structure, or location within the building or structure does not contain a significant amount of hazardous chemicals. It is

recommended that the local fire departments be advised on the types and amounts of hazardous chemicals as well as any unusual hazards that may be encountered by emergency personnel.

1.9.1 Size

The signs shall be at least seven and one-half (7 ½) inches on each side. The sign shall have four spaces, each at least three and three-fourths (3 ¾) inches on a single side. Numbers and symbols within each of the four spaces shall be at least three (3) inches high.

1.9.2 Location

If a building or structure has floor space of five thousand (5,000) square feet or less, Environmental Management shall post signs on the outside of the building or structure identifying the type of each hazardous chemical contained in the building or structure. If the building has more than five thousand (5,000) square feet, in addition to the signs posted outside, Environmental Management shall post a sign at the place within the building where each hazardous chemical is permanently stored to identify the type of hazardous chemical. If the hazardous chemical is moved within the building, Environmental Management shall also move the sign or post an additional sign at the location(s) where the hazardous chemical is moved. This subsection only applies to significant amounts of a hazardous chemical as defined in 380:45-5(d).

1.9.3 Categories

Signs shall identify the hazards of a chemical in terms of three principle categories: "Health", "Flammability", and "Reactivity" (instability), and indicate the order of severity numerically by fire divisions ranging from four (4), indicating a severe hazard, to zero (0), indicating no special hazard. This information shall be presented by a spatial system of diagrams with "health" always being on the left, "flammability" at the top, and "reactivity" (instability) on the right. Supplementing the spacing arrangement, color backgrounds or numbers are used for three categories, with blue representing "health", red representing "flammability", and yellow representing "reactivity". The fourth space, at the bottom, is used to indicate unusual reactivity or other special hazard warnings in black and white colors.

1.9.4 Highest Hazard Posting

In instances where the number of signs exceeds five, and where posting of a sign for each hazardous chemical would be ambiguous, repetitive, or where space is limited by the physical characteristics of the structure, Environmental Management may enter into a written agreement with the fire chief of the local fire department which provides for the posting of signs for most hazardous chemical in each principle category set in 380:45-5-5(d)(2). The agreement is subject to the approval of the Commissioner of Labor pursuant to the procedure for a variance as specified in 380:45-5-5(b). If the variance is approved, the employer shall post in the same location as the required posted signs, a sign stating "Signs not posted for all hazardous chemicals." These signs shall be in block letters at least three (3) inches in height.

1.9.5 Significant Amounts

A chemical meeting any of the following criteria shall be considered a "significant amount" of a

hazardous chemical:

A. Any amount of a hazardous chemical which is classified according to the U.S. Department of Transportation (USDOT) as:

(1) Explosive 1.1, 1.2, 1.3

(2) Inhalation Hazard 2.3

(3) Dangerous When Wet 4.3

(4) Type B Organic Peroxide 5.2

(5) Inhalation Hazard 6.1

(6) Radioactive material requiring a special license from the Nuclear Regulatory Agency

B. The aggregate amount of hazardous chemical(s) stored, placed or used at the workplace is greater than or equal to fifty-five (55) gallons of liquid or five hundred (500) pounds of non-liquid or eight hundred (800) cubic feet of pressurized gas where the numerical rating of the hazardous chemical based on the NFPA 704-1985 results in:

(1) Health ratings greater than or equal to Two (2) or

(2) Flammability ratings greater than or equal to Two (2) or

(3) Reactivity ratings of greater than or equal to One (1)

C. If the hazardous chemical is a combination of the liquid and non-liquid states, the aggregate amount measurement shall be made considering the combined poundage

1.10 Training

At the time of a fire, employees should know what type of evacuation is necessary and what their role is in carrying out the Fire Prevention Plan. In cases where the fire is large, total and immediate evacuation of all personnel is necessary. In the event of a smaller fire, a partial evacuation of non-essential personnel with a delayed evacuation of others may be necessary for continued operation. Environmental Management shall assure that employees know what is expected of them during a fire to assure their safety. In order to provide for employee safety, Environmental Management has chosen to train employees through classroom presentations followed by periodic emergency drills. Training for fire prevention/evacuation and fire extinguisher safety may be combined as one course. Training shall be conducted on an annual basis and cover the following categories:

1.10.1 Initial Training

Environmental Management shall conduct initial training for employees, which covers the following items:

A. What to do if an employee discovers a fire

B. Location and activation of fire alarms

C. Demonstrations of alarms (if more than one exists)

D. How to recognize fire exits

E. Evacuation routes

F. Assisting employees with disabilities

G. Measures to contain fires

H. Head count procedures

I. Return to building and operations after the "all clear" signal

The Training Officer shall certify in writing that the employee has received the appropriate fire prevention plan training. Because failure to comply with company policy concerning fire prevention can result in OSHA citations and fines, as well as employee injury, any employee who does not comply with this policy shall face disciplinary action up to dismissal.

1.10.2 Fire Prevention Equipment

The Training Officer shall provide training for each employee who is required to use fire prevention equipment. Employees shall not use fire prevention equipment without appropriate training. This training shall include:

A. Types of fires

B. Types of fire prevention equipment

C. Location of fire prevention equipment

D. How to use fire prevention equipment

E. Limitations of fire prevention equipment

F. Proper care and maintenance of assigned fire prevention equipment

Employees must demonstrate an understanding of the training and the ability to use the equipment properly before they are allowed to perform work requiring the use of fire prevention equipment. If the Safety/Compliance Officer, the Training Officer, or an employee's Supervisor has reason to believe an employee does not have the understanding or skill required, the employee must be re-trained.

Appendix A

29 CFR 1910.38(b)

Appendix B

29 CFR 1910.155

Appendix C

29 CFR 1910.157

FORKLIFT SAFETY

Environmental
MANAGEMENT

2017

1.1 Forklift Operation Plan

It's hard to imagine any tool more important to materials handling than the powered industrial truck - the forklift. Like many companies, Environmental Management relies on these versatile vehicles to load, unload, and move stock and other materials.

This written Forklift Operation Program establishes guidelines to be followed whenever any of our employees work with powered industrial trucks at this company. The rules established are to be followed in order to:

* Provide a safe working environment

* Govern operator use of powered industrial trucks, and

* Ensure proper care and maintenance of powered industrial trucks

The procedures here establish uniform requirements designed to ensure that powered industrial truck safety training, operation, and maintenance practices are communicated to, and understood by, the affected employees. These requirements are also designed to ensure that procedures are in place to safeguard the health and safety of all employees.

It is our intent to comply with the requirements of OSHA's 29 CFR 1910.176 and 1910.178. These regulations have detailed requirements for powered industrial truck operator training and powered industrial truck operations.

1.1.1 Administrative Duties

The Health & Safety Officer acts as Forklift Operation Program Coordinator, acting as the representative of Environmental Management. Copies of this written program may be obtained from the Health & Safety Officer or the Health & Safety database.

1.1.2 Powered Industrial Trucks at Our Workplace

Environmental Management uses the following powered industrial trucks:

Make and model:	Class and designation:	Quantity:	Purpose and location:
Large Lift	6000 capacity – Service Weight 10,700 – Rated Loads on Forks: Drive Wheels – 3787; Steer Wheels – 775; No Load on Forks: Drive Wheels - 1344; Steer Wheels - 266	1	Material, drum movement

Small Lift	Truck Weight – 10,734; Maximum Capacity - 5300	1	Material, drum movement
Bobcat 773	Pallet Fork Rating – 1230: With Weight Kit – 1305: Operating Capacity – 1850		
Bobcat 873	Pallet Fork Rating – 1480: With Weight Kit – 1520: Operating Capacity - 2400	2	Material & Drum movement

1.2 Training

Topics:

- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate.
- Differences between the truck and the automobile.
- Truck controls and instrumentation: where they are located, what they do, and how they work.
- Engine or motor operation.
- Steering and maneuvering.
- Visibility (including restrictions due to loading).
- Fork and attachment adaptation, operation, and use limitations.
- Vehicle capacity.
- Vehicle stability.
- Any vehicle inspection and maintenance that the operator will be required to perform.
- Refueling and/or charging and recharging of batteries.
- Operating limitations.

The Training Officer will identify all new employees in the employee orientation program and make arrangements with department management to schedule training. All trainers must be qualified and have the knowledge and ability to teach and evaluate operators.

Before we begin training a new employee, our Forklift Operation Program Administrator, determines if the potential powered industrial truck operator is capable of performing the duties necessary to be a competent and safe driver. This is based upon his/her physical and mental abilities to perform job functions that are essential to the operation of the vehicle.

These capabilities include the level at which the operator must:

* See and hear within reasonably acceptable limits (this includes the ability to see at a distance and peripherally, and in certain instances, it is also necessary for the driver to

discern different colors, primarily red, yellow, and green)

* Endure the physical demands of the job

* Endure the environmental extremes of the job, such as the ability of the person to work in areas of excessive cold or heat. An operator must be able to climb onto and off of a truck, to sit in the vehicle for extended periods of time, and to turn his/her body to look in the direction of travel when driving in reverse

Once our Administrator determines that a potential operator is capable of performing powered industrial truck duties, the training department shall conduct initial training and evaluation The assigned instructor(s) shall have the necessary knowledge, training, and experience to train new powered industrial truck operators. All instructors have received train-the-trainer certification and have demonstrated competency in the subject matter.

1.2.1 Initial Training

The new operator's initial training will include both classroom instruction and practical training. The classroom instruction includes the following formats: Lecture, discussion, videos, and the written evaluation.

The practical training includes vehicle inspection/maintenance and the road test. All powered industrial truck operators are trained and tested on the equipment they will be driving before they begin their job. The practical training is conducted utilizing vehicles and operations commensurate with the job function.

Each type of powered industrial truck has a different "feel" to it and that makes operating it slightly different from operating other industrial trucks. The work areas where these trucks are being used also present particular hazards. For these reasons, it is impractical to develop a single "generic" training program that fits all of our powered industrial trucks. Accordingly, during training, Environmental Management covers the operational hazards of our powered industrial trucks, including:

* General hazards that apply to the operation of all or most powered industrial trucks

* Hazards associated with the particular make and model of the truck

* Hazards of the workplace in general

* Hazards of the particular workplace where the vehicle is operated

If any potential operator has received training in any of the elements of our training program, and is evaluated to be competent, they need not be retrained in those elements before initial assignment in our workplace. The training must be specific for the types of trucks that employee will be authorized to operate, and for the type of workplace in which the trucks will be operated.

1.2.2 Training Certification

After an employee has completed the training program, the instructor will determine whether the potential driver can safely perform the job. At this point, the trainee will take a performance test

or practical exercise through which the instructor(s) will decide if the training has been adequate. All powered industrial truck trainees are tested on the equipment they will be driving.

The training department is responsible for keeping records certifying that each employee has successfully completed operator training and testing. Each certificate includes the name of the driver, the date(s) of the training, and the name of the person who did the training and evaluation.

See Appendix A for a current copy of the training material, the course outline, and sample training certificate.

1.2.3 Performance Evaluation

Each certified powered industrial truck operator is evaluated at least once every 3 years to verify that the operator has retained and uses the knowledge and skills needed to drive safely. The training department shall perform this evaluation. If the evaluation shows the operator is lacking the appropriate skills and knowledge, the operator is to be retrained before allowed to operate said powered truck.

1.2.4 Refresher Training

Refresher training is triggered by any of the following situations:

* If the operator is involved in an accident or a near-miss incident

* If the operator has been observed driving the vehicle in an unsafe manner

* When the operator is assigned to a different type of truck

* If it has been determined during an evaluation that the operator needs additional training

* When there are changes in the workplace that could affect safe operation of the truck. This could include a different type of paving, reconfiguration of the storage racks, new construction leading to narrower aisles, or restricted visibility

1.3 Inspections

1.3.1 Pre-Operational Inspection Procedures

The company requires operators to perform pre-operational equipment checks on powered industrial trucks prior to the beginning of each shift in which those trucks will be utilized to ensure the safe operating condition of the vehicle. The pre-operational check is performed by completing a daily truck inspection checklist.

See Appendix B for a sample inspection form. A supply of these forms is located in the terminal office.

No blank spaces are allowed on the form. If an item does not apply, use the code N/A. It is also an operator requirement to fill out the comment section thoroughly and accurately if there are any operational or visual defects. This ensures the Maintenance Department can pinpoint and repair the problem before the truck becomes unsafe to operate.

The Terminal Manager is responsible for retaining all daily truck inspection checklist forms for each vehicle for 6 months.

1.3.2 Periodic Inspection Procedures

Periodic inspections are in conjunction with the particular powered industrial truck's maintenance or service schedule. Maintenance schedules are normally expressed in days and operating or running hours. Phil Varner perform(s) inspection and maintenance as per manufacturers' recommendations. Most manufacturers' operator instruction manuals contain the recommended maintenance schedule. Inspections and maintenance or repair beyond the recommended service schedules are done by authorized workshops and/or service technicians.

The Terminal Manager is responsible for retaining all periodic truck inspection checklist forms for each vehicle.

1.3.3 Job Site Inspections

Operator must verify trailer chocks, supports, and dock plates prior to loading/unloading.

1.4 Operating Procedures

Powered industrial trucks can create certain hazards that can only be avoided by safe operation of the vehicle. Based on this fact, certain operational procedures have been established to ensure operator safety. Our operating procedures are as follows.

1.4.1 Driving

Driving a powered industrial truck is fundamentally different than driving a car or other trucks. In fact, powered industrial trucks:

* Are usually steered by the rear wheels
* Steer more easily loaded than empty
* Are driven in reverse as often as forward
* Are often steered with one hand
* Have a center of gravity toward the rear, shifting to the front as forks are raised

Unlike cars, some powered industrial trucks have a greater chance of tipping over when suddenly turned. Because of the design of powered industrial trucks, they have a very short rear wheel swing. This means that, at high speeds, sudden turns can tip them and could result in serious injury and damage. Speed can cause the center of gravity to shift dramatically. Similarly, speeding over rough surfaces can cause tipping.

Although structurally different than cars, powered industrial trucks, like cars, can collide with property and people. Therefore it is our policy for all operators to follow these driving procedures:

1.4.2 Load Lifting and Carrying

Powered industrial trucks can lift only so much. Each truck has its own load capacity, which is indicated on the rating plate. Powered industrial trucks also have three-point suspension that forms an imaginary triangle from the left front wheel to the right front wheel to the point between the two back wheels. The center of gravity for a powered industrial truck must lie somewhere within this triangle or else the truck will tip over. The load and its position on the forks, as well as traveling speed and slopes, all affect the center of gravity.

1.4.3 Fuel Handling and Storage

Some of our powered industrial trucks operate with highly flammable and combustible fuels.

The storage and handling of liquid fuels, including gasoline and diesel fuel are done in accordance with NFPA Flammable and Combustible Liquids Code (NFPA 30-1969).

All employees who handle or use flammable liquids have received instruction in their safe handling and use and are aware of the specific OSHA requirements pertaining to those liquids.

1.4.4 Carbon Monoxide Awareness

Powered industrial trucks with internal combustion engines produce carbon monoxide (CO), an odorless, colorless, and deadly gas produced by the incomplete burning of any material that contains carbon. These materials include gasoline, natural gas, propane, coal, and wood. The most common source of CO is the internal combustion engine. Trucks, cars, forklifts, floor polishers, pressure washers, or any other machine powered by fossil fuels generates CO.

If inhaled, CO restricts the ability of your blood system to carry oxygen to the body tissues that need it. Overexposure combined with less oxygen results in carbon monoxide poisoning. Mild poisoning can result in headaches, tightness in the chest, dizziness, drowsiness, inattention, fatigue, flushed face, or nausea. If you continue exposure, lack of coordination, confusion, weakness, or loss of consciousness may result. A heart condition, smoking, taking drugs or alcohol, and pregnancy can aggravate CO poisoning. Physical activity can also make a situation worse. That's because your body needs more oxygen during exertion. Severe poisoning can kill you within minutes, sometimes without warning symptoms. The more CO there is in the air and the longer the exposure, the greater the danger.

All employees are trained to recognize the hazards associated with carbon monoxide.

1.4.5 Personal Protective Equipment (PPE)

Due to the nature of operations it is sometimes necessary to utilize various forms of personal protective equipment. Examples would include respirators, splash garments, gloves, boots, hard hats, safety glasses, etc.

All operators required to wear this equipment are trained in the following areas.

* When PPE is necessary

* What PPE is necessary

* How to properly don, doff, adjust, and wear PPE

* Limitations of the PPE

* Proper care, maintenance, useful life, and disposal of PPE

See the written Personal Protective Equipment Program for more details.

1.4.6 Pedestrians

Because powered industrial trucks are typically used near pedestrians, we require both pedestrians and powered industrial truck operators to watch out for each other.

All powered industrial truck operators must:

* Yield to pedestrians

* Warn pedestrians of their presence

* Alter driving habits when pedestrian conditions require

All pedestrians must:

* Remain alert for power industrial truck traffic

1.5 Maintenance

Investing time and effort into the proper upkeep of our equipment results in day-to-day reliability. Keeping up with the manufacturer's recommended maintenance, lubrication schedules, and completing the proper records will also increase our trucks' longevity and enhance its resale value.

The maintenance supervisor completes a receiving or delivery inspection whenever our company purchases powered industrial trucks, and he performs the recommended "breaking in" inspections and maintenance.

The maintenance supervisor also follows the manufacturer's operator instruction manual for daily or weekly maintenance.

Periodic maintenance (those completed monthly, every 6 months, or annually) is done by a factory-trained expert or a dealer. Environmental Management's Maintenance Manager retains all maintenance records.

Appendix A

Training Outline/Lesson Plan/Sample Training Certificate

Appendix B

Daily Inspection Forms

Appendix C

29 CFR 1910.178

Volume 3

General Waste Management

2015

Assessment 1.1

Prior to initiating a project the, Emergency Response Coordinator will assess the waste and scrap materials to determine the correct and necessary containers to complete the job. Environmental Management, Inc. can provide any container necessary for proper disposal and processing. This includes, but is not limited to, roll-offs of various size with roll back tarps, tankers of various size, totes, end dumps, bob tails, drums of various size, storage tankers of various size. The Project Manager will attempt to recover and utilize or caused to be utilized any and all materials that are still usable, plus recover any scrap items of value.

Storage and Organization 1.2

All material will be stored and secured in its proper DOT shipping container which can include all-packs, drums, roll-off containers, tankers, storage tanks and/or totes. If a roll-off container is used, at the end of each workday the tarp will be secured. All containers shall be visually inspected on a routine basis.

Employees 1.3

Employees of Environmental Management, Inc. will have, at a minimum, 40 hour HAZWOPER training before they will be assigned any task that requires handling hazardous waste. The hazards and the proper processing methods will be communicated with all affected employees to minimize the potential for any injuries, or environmental impact.

Segregation 1.4

Environmental Management, Inc. has developed a Product Distribution Program. This program places usable products back into commerce. The materials that are indeed "damaged freight" (i.e. usable products) are available to the public at no cost. If the material is unusable, it is identified as a waste and will be consolidated and shipped to the proper disposal facility. Dismantling projects are reviewed for the potential of metal reclamation.

GROUNDING CONDUCTOR PROGRAM

Environmental
MANAGEMENT

2017

1.1 Purpose

The purpose of this "Grounding Conductor Program" is to ensure that all Environmental Management employees are afforded the maximum levels of safety when utilizing electrical equipment and/or tools during field projects and routine activities at the Guthrie facility. The emphasis shall be directed to those cord sets and receptacles, which are not a permanent installation of any building or structure that have adequate protection incorporated into their design.

1.2 Scope

Any Environmental Management employee who performs a job function requiring the use of energized electrical equipment, tools, cords or components shall adhere to the elements of this program.

1.3 Application

Ground fault circuit interrupters shall be provided on all 120 volt, single phase 15 & 20 amp receptacle outlets on all sites where needed. In addition, receptacles on a 2-wire single phase portable or vehicle-mounted generator rated for not more than 5 kW shall be supplied with the same GFI circuits. This written program and any accompanying documents such as, SOPs, protocols, and practices shall be made available at the work-site for inspection and copying by any affected employee or the Assistant Secretary of OSHA.

1.4 Competent Person

Job-site safety assurance shall be the responsibility of a competent person as defined by OSHA in 29 CFR 1926 .32 (f). A competent person is that individual who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them. The on-site Environmental Management supervisor in conjunction with a qualified electrician shall determine appropriate conductor grounding procedures to be established on a case-by-case basis.

1.5 Inspection Procedures

Daily visual inspections shall be performed on all cord sets, attachment cap, plugs and receptacle of cord sets and connected equipment before use. Any equipment determined to be damaged or defective shall be "tagged" and removed from service. The following test procedures shall be performed to identify any external defects or damage.

1.5.1 All grounding conductors shall be tested for continuity and shall be electrically continuous.

1.5.2 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.

1.5.3 Tests shall be performed before first use.

1.5.4 Before equipment is returned to service after repair.

1.5.5 Before equipment is used after any incident, which can be reasonably suspected to have caused damage, e.g., cord set run over by equipment or vehicle.

1.5.6 At intervals not to exceed 3 months, except that cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months.

No employee of Environmental Management shall use any equipment that does not meet the requirements set forth in this program.

1.6 Recordkeeping

All required tests shall be properly recorded and retained. The test record shall identify each receptacle, cord set, and cord-and-plug-connected equipment that passed the test and shall indicate the last test date it was tested or the interval for which it was tested. This record shall be kept by means of logs, color coding, or other effective means and shall be maintained until replaced by a more current record. All records shall be made available on the jobsite, for inspection by the Assistant Secretary and any affected employee.

1.7 Summary

The primary objective of this program is to provide employees the necessary guidance to identify potential problems that could occur when using energized electrical components associated with cord sets, receptacles, gang-boxes and the connected equipment to these items. If you have a specific concern or need additional information consult your immediate supervisor. If you have ideas to improve the process please voice your opinions to the Health and Safety Officer or a member of management.

Hand & Power Tool Safety

Section 10 B

1.1 Purpose

The purpose of this program is to ensure that all employees of Environmental Management are informed of the hazards associated with the use of hand and power tools in the workplace. It is the intent of Environmental Management to provide a workplace free of hazards through the use of engineering controls, administrative controls, personal protective equipment and adequate training of employees.

1.2 Scope

This program encompasses all field employees during both facility and contract activities and includes all sub contractors working on Environmental Management projects.

1.3 Tool Maintenance

All hand and power tools and similar equipment shall be maintained in a safe condition whether company provided or employee owned.

1.3.1 The use of any machinery, tool, material or equipment which is not in compliance with 29 CFR 1926 .20 is prohibited. Such machine, tool, material or equipment shall either be identified as unsafe by tagging or locking out the controls to render them inoperable or shall be physically removed from its place of operation.

1.4 Guarding

1.3.1 When any power tool is designed to accommodate a guard the guard shall not be removed or modified or in any way altered during use.

1.3.2 Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains or other reciprocating, rotating or moving parts of equipment shall be guarded if such parts are exposed to contact by employees or otherwise create a hazard. Guarding shall meet the requirements as set forth by the American National standards Institute, !5-1-1953.

1.5 Personal Protective Equipment

Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors or gases shall be provided with the particular PPE necessary to protect them from the hazard. All personal protective equipment shall meet the requirements and be maintained according to the company's PPE program.

HAZARDOUS COMMUNICATIONS PLAN

Environmental
MANAGEMENT

2017

1.1 Purpose

The purpose of this program is to inform interested persons, including employees, that Environmental Management is complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200. The elements of the program include a comprehensive list of hazardous materials in the workplace, safety data sheets (SDSs), container labeling requirements, chemical specific information, training, and appropriate personal protective equipment

This program applies to all work operations in our company where employees may be exposed to hazardous substances under normal working conditions or during an emergency response situation.

The Health & Safety Officer, is the program coordinator, acting as the representative of Environmental Management, he has overall responsibility for the program. He will review and update the program, as necessary. Copies of the written program may be obtained from the Health & Safety Database.

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDSs, and chemical information lists from the Health & Safety Officer or from the Database. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. Our employees will also be informed of the hazards associated with non-routine tasks, such as the cleaning of tanks and vessels, and the hazards associated with chemicals in unlabeled containers, pipes and transportation vehicles.

If after reading this program, you find that improvements can be made, please contact the Health & Safety Officer. We encourage all suggestions because we are committed to the success of our written hazard communication program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

1.2 Hazard Evaluation Procedures

Our chemical inventory is a list of hazardous chemicals known to be present in the workplace. Anyone who comes into contact with the hazardous chemicals on the list needs to know the chemical and physical properties of those chemicals, location, and how to protect themselves and co-workers from potential exposure. It is extremely important that hazardous chemicals are identified, whether they are found in a container or generated in a work process (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Identification of all chemicals on-site can be found in the SDS book or on the comprehensive chemical inventory list. Stated list can be found in Appendix C of this document.

The Health & Safety Officer is responsible for insuring the chemical list and all SDS's are current and accurate. The Chemical Inventory List is located on the Health & Safety Database

thereby, affording all employees access during normal work hours.

1.3 Definitions

For the purpose of this program, the terms defined hereunder shall have the following meanings respectively ascribed to them. Where terms are not defined, the ordinarily accepted meanings within the proper context shall apply.

"Aggregate amount" means any combination of hazardous material(s) as defined by this section.

"Announced inspection" means any inspection for the purpose of determining compliance with 40 O.S. 403 (E) conducted on the first working day of any calendar quarter or any inspection for which 48 hours notice is given to the employers. Announced inspections will be conducted only for the purpose of determining compliance with 40 O.S. 403 (E)

"Asbestos containing material" means material that has been determined by a competent laboratory facility to contain more than one percent (1%) asbestos by weight.

"CAS number" means a unique identification number assigned by the Chemical Abstract Service to chemicals.

"Chemical" means any element, chemical compound, or mixture of elements and/or compounds.

"Chemical Name" means the scientific designation of a substance in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstract Service (CAS) rules of nomenclature or an alternate name found in the National Institute of Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS) or a prescription generic drug name.

"Combustible liquid" means any liquid having a flash point at or above 100 F (37.8 C) but below 200 F (93.3 C), except any mixture having components with flash points of 200 F (93.3 C) or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.

"Common name" means any designation or identification, such as trade name or number, code name or number, brand name, or generic name used to identify a substance other than by its chemical name.

"Compressed gas" means any compound that exhibits:

* A gas or mixture of gases having, in a container, an absolute pressure exceeding 40 psi at 70 F.

* A gas or mixture of gases having, in a container ,an absolute pressure exceeding 104 psi at 130 F regardless of the pressure at 70 F

* A liquid having a vapor pressure exceeding 40 psi at 100 F

"Container" means any barrel, bottle, box, can, cylinder, drum, storage tank, reaction vessel, or the like that contains a hazardous material. For the purposes of this section, pipes or piping systems, engines, fuel tanks or other operating systems in a vehicle are not considered to be containers.

"Designated or Employee Representative" means any individual or organization to whom an employee gives written authorization to exercise such employee's rights under this section. A recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

"Distributor" means business, other than a chemical manufacturer or importer, which supplies hazardous substances to the employer.

"Employee" means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

"Employer" means a person or persons engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.

"Explosive" means a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure or high temperature.

"Exposure or exposed" means an employee is subjected, in the course of employment, to a chemical that is a physical or health hazard.

"Facility" means all grounds, property, buildings or other stationary items under common ownership or control.

"Fire department" means any duly constituted department operating under the authority of Title 11 article XXIX fire departments or Title 19 Chapter 21 fire protection districts or Title 18 corporations. Industrial fire brigades are excluded from this definition.

"Flammable" means a chemical that falls into one of the following categories

* An aerosol that yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back into the valve) at any degree of the valve opening

* A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less; or a gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit;

* Any liquid having a flash point below 100 F, except any mixture having components with flash points of 100 F or higher, the total of which make up 99 percent or more of the total volume of the mixture.

* A solid, other than a blasting agent or explosive as defined in 1910.109 (a), that is liable to cause a fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and

when ignited burns so vigorously and persistently as to create a serious hazard. A chemical shall be considered to be a flammable solid if it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

"Flash point" means the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite.

"Hazardous chemical" (substance) means any chemical which is a physical or health hazard

"Hazard warning" means any words, pictures, symbols, or combination appearing on a label or other appropriate form of warning which convey the specific physical and health hazard(s), including target organ effects of the chemical(s) in the container(s). (See definitions of physical hazard and health hazard to determine which must be covered.)

"Health hazard" means any chemical or biological substance or agent which is listed in the U.S. Occupational Safety and Health Administration's list of Toxic and Hazardous Substances, 29 CFR Part 2910, Subpart Z; any other substance including but not limited to chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, or hepatopoietic systemics; agents which damage the lungs, skin, eyes or mucous membranes; any substance for which a Safety Data Sheet has been provided by the manufacturer as a hazardous material; or such substances deemed by the Commissioner, based on documented scientific evidence, that pose a threat to the health and safety of employees.

"Identity" means any chemical or common name which is indicated on the safety data sheet for the chemical. The identity used shall permit cross-reference to be made among the required list of hazardous chemicals, the label and SDS.

"Immediate use" means the hazardous chemical will be under the control and used only by the person(s) who transfer it from a labeled container and only within the work shift in which it was transferred.

"Label" means any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

"Manufacturer" means a person or establishment where hazardous substances are produced, synthesized, extracted, imported, or otherwise made for use or distribution.

"Safety Data Sheet (SDS)" means written or printed material concerning a hazardous chemical which is prepared in accordance with OSHA standard 1910.1200.

"Mixture" means any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

"Oxidizer" means a chemical other than a blasting agent or explosive as defined in 1910.109(a), that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.

"Physical hazard" means any chemical which is a compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable (reactive) or water-reactive, or which is contained in the U.S. Occupational Safety and Health Administration's list of Hazardous

Materials, 29 CFR Part 1910 subpart H; any substance for which a safety data sheet has been provided by the manufacturer as a hazardous material; or such substances deemed by the Commissioner, based on documented scientific evidence, that pose a threat to the health and safety of an employee.

"Proprietor" means owner, manager, or other person or organization which has control over any location where hazardous substances are present, and which is subject to the jurisdiction of employers subject to the provisions of this section.

"Pyrophoric" means a chemical that will ignite spontaneously in air at a temperature of 130 F. or below.

"Research laboratory" means a specially designated area used primarily for research, development, and testing activity and not primarily involved in the production of goods in which substances are used.

"Safety class" means instruction in safety and/or health and includes but is not limited to: videos, audio tapes, books, brochures, handouts, slides, classroom instruction or lectures including in-service training or "tailgate sessions"

"Safety/Compliance Officer" means an employee who has been designated by an employer to coordinate all safety programs of the employer.

"Safety programs" means those employer activities that:

* Implement management commitment to worker health and safety generally

* Implement procedures for identifying and controlling workplace hazards

* Develop and communicate safety plans, rules or work procedures

* Conduct or provide training for supervisors and employees in safe and healthful work practices.

"Service Contractor" means any person, company, or corporation that provides a service to the employer with or without a written agreement.

"Significant amount" means any amount of hazardous material(s) meeting the criteria in Oklahoma 380:45-5-5-(d)

"Specific chemical identity" means the chemical name, Chemical Abstract Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

"Trade Secret" means any formula, plan, pattern, process, production data, information or compilation of information, which is not patented, which is known only to a manufacturer and certain other individuals, and which is used in the fabrication and production of an article of trade or service, and which gives the manufacturer possessing it a competitive advantage over businesses who do not possess it, or the secrecy of which is certified by an appropriate official of the federal government as necessary for national defense purposes. The chemical name and

Chemical Abstract Service number of a substance shall be considered a trade secret only if the manufacturer can establish that the substance is unknown to competitors. In determining whether a trade secret is valid pursuant to these regulations, the Commissioner shall consider material provided by the manufacturer concerning the following:

* The extent to which the information for which the trade secret claim is made known outside the manufacturer's business

* The extent to which the information is known by others involved in the manufacturer's business

* The extent of measures taken by the manufacturer to guard the secrecy of the information

* The value of the information to the manufacturer or the manufacturer's competition

* The amount of effort or money expended by the manufacturer in developing the information

* The ease or difficulty with which the information could be disclosed by analytical techniques, laboratory procedures, or other means.

"Type or Class of employee" means the occupation, activity, standard industry designation or other characteristic of employees that has a bearing on the nature or extent of workplace hazards to which they are exposed.

"Unstable (reactive)" means a chemical which in pure state, or as produced or transported, will vigorously polymerize, decompose, condense, or will become self-reactive under conditions of shocks, pressure or temperature.

"Use" means to package, handle, react, emit, extract, generate as a by-product, or transfer.

"Water reactive" means a chemical that reacts with water to release a gas that is either flammable or presents a health hazard.

"Wet floor" means a floor that is used on an occasional to routine basis to collect, contain, maintain or transmit standing liquids.

"Work area" means any room or defined space, whether within or outside of a building or structure, where hazardous substances are present, produced, used or where exposure could occur.

"Workplace" means any location away from home, permanent or temporary, where any employee performs any work related activity or function in the course of his/her employment.

1.4 Safety Data Sheets (SDSs)

The SDS's we use are fact sheets for chemicals that pose a physical or health hazard in the workplace. SDS's provide our employees with specific information on the chemicals they use or have the potential to be exposed to during response operations.

The Health & Safety Officer is responsible for obtaining/maintaining the SDSs at our facility. He will contact the chemical manufacturer or vendor if additional research is necessary.

The safety data sheets are kept at the following location(s) in our facility:

* Main office building

* Maintenance building

* Mixing room

* Response locations as provided by customer

Safety Data Sheets are made available upon request by any employee, their designated representative the Assistant Secretary or Director of OSHA in accordance with 29 CFR 1910.1020 (e).

Environmental Management does not manufacture any chemicals and, therefore, does not make any hazard determinations or develop any Safety Data Sheets.

After the chemical inventory is compiled, it serves as a list of every chemical for which an SDS must be maintained.

1.5 Labels and Other Forms of Warning

Labels list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. The chemical identity is found on the label, the SDS, and the chemical inventory. Therefore, the chemical identity links these three sources of information. The chemical identity used by the supplier may be a common, trade name, or a chemical name. The hazard warning is a brief statement of the hazardous effects of the chemical (i.e., "flammable," or "causes lung damage"). Labels frequently contain other information, such as precautionary measures (i.e., "do not use near open flame"), but this information is provided voluntarily by our company and is not required by the rule. Our labels are legible and prominently displayed; though their sizes and colors can vary. In addition, a DOT warning label is required to remain affixed to all containers until empty. Labels shall not removed or defaced on incoming containers of hazardous materials unless the container is immediately marked with the required information.

Examples of labels utilized are included in Appendix B.

* The Health & Safety Officer is responsible for ensuring that all hazardous chemicals and facility containers are properly labeled and updated, as necessary. He also ensures that newly purchased materials are checked for labels prior to use.

* The terminal Supervisor is responsible for ensuring the proper labeling of any shipped containers.

* The Health & Safety Officer or an immediate supervisor will refer to the corresponding SDS to assist employees in verifying label information.

* Posters are displayed to inform employees about the hazard communication standard. They are located in the main office building, maintenance shop office, and mixing room break area.

* If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container.

- No alternatives to labeling are used in this workplace.
- At this time all Environmental Management employees are capable of speaking and reading English. All placards, signage, Safety Data Sheets, etc. are in English. Should the cultural makeup of the organization change in the future, all hazard communications shall be disseminated in that employee's native language through placards, labels, signage, etc. An interpreter shall be used to communicate training and other important information regarding health and safety issues.

1.6 Training

Everyone who works with, or is potentially "exposed" to hazardous chemicals, will receive initial training and any necessary retraining on the Hazard Communication Standard and the safe use of those hazardous chemicals. "Exposure" means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, absorption or injection). Whenever a new hazard is introduced or an existing hazard changes, additional training is mandated.

Information and training is a critical part of the hazard communication program. We train our employees to read and understand the information on labels and SDSs, to determine how the information can be obtained and utilized, and to understand the risks of exposure when in contact with chemicals in the workplace or during an emergency response.

Our goal is to ensure employee comprehension and understanding of the potential hazards of exposure when dealing with hazardous chemicals, knowing how to read and use labels and SDSs, and appropriately following the protective measures that have been established. We encourage employees to ask questions and use good judgement in evaluating chemical exposure risks. As part of the assessment of the training program, the training coordinator asks for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

All employees receive training for hazard communication in accordance with 29 CFR 1910.1200. The training plan emphasizes these elements:

* Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used, and access to SDS information and what it means.

* Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals.

* Physical hazards of chemicals (e.g., potential for fire, explosion, etc.)

* Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical

* Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies)

Certificates are issued to employees upon completion of their training and are kept by the Technical Support Analyst.

1.6.1. Job Specific Training

Employees will receive on the job training from their immediate supervisor. This training will cover the proper use, inspection, and storage of necessary personal protective equipment and chemical safety training for the specific chemicals they will be using or working around.

1.6.2. Annual Refresher Training

Annual hazard communication refresher training will be conducted as a part of Environmental Management's continuing safety training program.

1.6.3. Immediate on the Spot Training

This training shall be conducted by supervisors for any employee that requests additional information or exhibits a lack of understanding of the safety requirements.

1.6.4. Contractor Training

All outside contractors working inside the Environmental Management facilities are required to follow the requirements of this program. Environmental Management will provide contractors information on the following as applicable:

A. Location and availability of SDS

B. Precautions to be taken to protect contractor employees

C. Potential exposure to hazardous substances

D. Chemicals used in or stored in areas where contractors will be working

E. Recommended Personal Protective Equipment

F. Labeling system for chemicals

1.7 Hazards of Non-Routine Tasks

When employees are required to perform any of the following hazardous non-routine tasks including confined space entries, tank clean-outs, or response to incidents involving multiple

chemicals and have the potential for exposure to hazardous chemicals, employees are informed of the hazards by providing chemical and container specific information as soon as practical utilizing other informational sources.

1.8 Hazards of Unlabeled Pipes

No unlabeled pipes are present at the Environmental Management facility. Identification of chemicals in non-labeled piping at customer locations shall be performed and recorded on the site-specific Health & Safety plan before any work activities commence.

Appendix A

29 CFR 1910.1200

Appendix B

Label Examples

Appendix C

Environmental Management Hazardous Chemical Listing

HAZWOPER
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE PLAN

Environmental
MANAGEMENT

2004

1.1 Administrative Duties

The Health & Safety Officer is responsible for developing and maintaining our facility's HAZWOPER plan. The plan is available for review and is located in the Health & Safety database.

1.2 General

HAZWOPER is a complicated regulation, with many different elements. Due to the complexity of the standard, Environmental Management has developed many safety plans that are utilized in conjunction with 29 CFR 1910.120 (HAZWOPER) to ensure compliance.

Because we have employees who are responsible for responding to chemical spills, our facility has developed a detailed Emergency Response Plan. The facility emergency response plan is a comprehensive plan covering those emergencies that might be anticipated during all workplace activities on-site. The following elements are included as defined in 29 CFR 1910.120 (q) (2)

1.2.1 Pre-emergency planning & coordination with local response agencies and potentially affected parties

1.2.2 Personnel responsibilities, chain of authority, and communication hierarchy

1.2.3 Emergency recognition, identification, containment and confinement actions

1.2.4 Safe distances, areas of refuge and evacuation procedures and routes

1.2.5 Decontamination procedures

1.2.6 Emergency first aid protocols

1.2.7 Emergency alerting and response procedures

1.2.8 Response and cleanup activity critiques

1.2.9 Personal protective equipment/emergency response equipment

1.2.10 Incorporate response plan with local and state plans

A site-specific health and safety plan is utilized on all field responses. See the attached plan in Appendix A of this document.

Because of the exposures and potential exposures that workers can have at our facility, we maintain a Medical Surveillance Program, under HAZWOPER. Because employees of Environmental Management use various types of PPE and/or respiratory equipment, in their day-to-day operations, or in the event of a chemical spill, extensive plan development in the area of PPE and Respiratory Protection has been established. These plans may be viewed in the Environmental Management Health and Safety Program.

Part of our general compliance is to involve local response authorities, when appropriate. In accordance with SARA Title III reporting requirements we have provided detailed information in the form of a Business Plan, planning documents and MSDS's to the Logan County LEPC and the Guthrie Fire Department.

The decontamination procedures used at our facility have been established in accordance with 29 CFR 1910.120 (k). Permanent eyewash and emergency shower stations are located throughout the facility. Portable decontamination systems are utilized in all field responses. The size and type of system is a job specific determination.

The site control measures established by Environmental Management have been established in accordance with 29 CFR 1910.120 (d). A site control program shall be developed during the planning stages of all hazardous waste cleanup activities and all emergency response operations. The following constitutes the minimum elements of the program:

* Site map development

* Establish work zones

* Use of the "Buddy System"

* Appropriate communications

* Standard Operating Procedures (SOP's)

* Identification of the nearest medical facility

1.3 HAZWOPER Training Program

As part of the HAZWOPER program, this facility has developed and implemented a program to inform workers (including contractors and subcontractors) performing hazardous waste or emergency response operations of the level and degree of exposure they are likely to encounter.

Environmental Management has also implemented procedures for introducing effective new technologies that provide improved worker protection in hazardous waste operations and spill/leak cleanup. Examples include PPE, foams, absorbents, adsorbents, neutralizers, etc.

Training informs workers of the potential hazards they may encounter and provides the necessary knowledge and skills to perform job functions with minimal risk to their health and safety. Environmental Management has developed a training program for all employees exposed to health and safety hazards.

The OSHA standard has established five (5) levels of training that identify the knowledge and response capabilities of employees required to respond to a hazardous materials incident. All field technicians, spill coordinators, and support staff having responsibility in the areas of response, remediation, documentation, etc have been trained to the "technician level". In addition all management, supervisory and field technicians have received "Incident Commander" training. Several employees have had extensive training in a particular area and have been certified as a "Hazardous Materials Specialist" employee. Because each training level builds on the next level, (i.e., an employee must be trained to the awareness level before the operations level), all

employees have received training in accordance with the standard, based on their response requirements. The following definitions of the 5 levels of training identify response capabilities and limitations.

1.3.1 Hazardous Materials Awareness Level Responder: 29 CFR 1910.120 (q) (6) (i)

Those individuals who have the potential to witness or discover a hazardous materials release and have been trained to recognize the problem. Identify the material using the DOT Emergency Response Guidebook when possible. Make notifications to the proper authorities and evacuate the area without becoming involved. *(This is a defensive role).* All office staff have been trained to respond at the awareness level only.

1.3.2 Hazardous Materials Operations Level Responder: 29 CFR 1910.120 (q) (6) (i i)

Those individuals who have been trained to the awareness level and who have an additional eight hours (8) of training. These employees are trained to respond in a defensive fashion without attempting to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and protect exposures. No Environmental Management employees respond at this level.

1.3.3 Hazardous Materials Technician Level Responder: 29 CFR 1910.120 (q) (6) (iii)

As previous stated all employees who are required to respond to a hazardous materials incident in an offensive fashion are trained at the technician level. These individuals are on-scene for the specific purpose of stopping the leak. They assume an aggressive posture by plugging, patching, damming, diking, etc. They have received at least twenty-four hours (24) of training equal to the operations level and have additional skills to respond in an offensive fashion.

1.3.4 Hazardous Materials Specialist Level Responder: 29 CFR 1910.120 (q) (6) (iv)

The hazardous materials specialist responds in conjunction with the technician level team to provide additional support. While their duties parallel that of the technician they also possess specialized skills or knowledge. They have received at least twenty-four hours (24) of training at the technician level and additional competencies in advanced techniques and procedures. There are only several employees that are certified at this level. They are utilized on hazardous materials responses that are complex, unusual, i.e., extremely hazardous materials, special containers, special techniques or procedures. In accordance with 29 CFR 1910 (q) (10) all PPE and equipment used by the specialist employee shall meet the requirements of 29 CFR 1910 (g) (3)-(5), which addresses PPE, SCBA and Totally Encapsulated ensembles.

1.3.5 Hazardous Materials On-Scene Incident Commander: 29 CFR 1910.120 (q) (6) (v)

All employees have been trained to use the Incident Command System. Response managers, spill coordinators and technicians have been trained as "Incident Commanders" in accordance with the standard. All are trained at the technician level and have received additional training in incident management practices and principles.

Both supervisors and workers must be trained to:

* Recognize hazards and strive to prevent them

* Select, care for, and use respirators properly as well as other types of personal protective equipment

* Understand engineering controls and their use

* Use proper decontamination procedures

* Understand the Emergency Response Plan, medical surveillance requirements, confined space entry procedures, spill containment program, and any appropriate work practices

Workers also must know the names of personnel and their alternatives responsible for site health and safety. The amount of instruction differs with the nature of the work operations. Employees must not perform any hazardous waste or emergency response operation unless they have been trained to the level required by their job function and responsibility and have been certified by their instructor as having completed the necessary training. All emergency responders must receive refresher training sufficient to maintain or demonstrate competency annually. Employee training requirements are further defined by the nature of the work (e.g., temporary emergency response personnel, firefighters, safety officers, HAZMAT personnel, incident commanders, etc.)

The training coordinator and training staff has the formal education, experience, and train-the-trainer credentials to design, develop, and deliver all Hazardous Materials related training. They meet or exceed all required prerequisites established for trainers in 29 CFR 1910.120 (q) (7).

The current Training Coordinator has been in the position for twelve (12) years. He holds a Masters degree, with numerous undergraduate degrees in safety and fire science. He also teaches as an adjunct professor at the college level, and is an instructor for the National Fire Academy. Professional certifications include:

Certified Hazardous Materials Manager

Registered Environmental Manager

Certified Environmental Trainer

Associate Safety Professional

All field personnel are trained both in hazardous materials waste-site cleanup activities and to the technician level in accordance with 29 CFR 1910.120 parts (a-q). All employees understand their responsibilities while working with an incident management system as defined by 29 CFR 1910.120 (q) (3). Those individuals who are required to act as an on-site incident commander have been trained and so certified in accordance with part (q) (6) (v).

All office staff and support personnel are trained to the awareness level in accordance with 29 CFR 1910.120 (q) (6) (i). All personnel are trained to a higher level in accordance with other regulatory agencies.

The operations level of training is not a function of Environmental Management employees.

Various individuals within the organization have specific expertise in areas such as chemistry, container design/type, etc to be considered specialist employees as defined in part (q) (6) (iv), and have been so certified.

As a HAZWOPER component all field employees are provided with 40 hours of training consisting of lecture, hands-on and video based activities. In addition to the initial 40 hours of training, approximately 64 additional hours are conducted in other areas of health and safety during the first 90 days of employment. All employees are also required to have 24 hours of field training under a qualified supervisor before becoming certified. Annual refresher training is also conducted as required.

The procedure to train new employees at the time of their initial assignment include, HAZWOPER, Hazardous Communications, Personal Protective Equipment and Department of Transportation training. Retraining shall be accomplished on an annual basis or in accordance with a specific standard. Remedial training may be warranted when an employee is deemed to have insufficient knowledge to perform their job function safely.

Certificates signed by the Training Officer are issued upon completion of training.

Employees at all hazardous waste sites have been trained to the level required by their job function and responsibility prior to performing any hazardous waste operation activity.

All emergency responders have received refresher training sufficient to maintain or demonstrate competency annually.

We provide for pre-entry briefing to be held prior to initiating any site activity, and at such other times as necessary to ensure that employees are apprised of the site health and safety plan elements.

1.4 Organizational Structure

The Terminal Manager, On-Site Coordinator or Incident Commander is the general supervisor who has the responsibility and authority to direct all hazardous waste operations or emergency responses.

The individual who has job-site authority is responsible to assign a safety officer who has the skills and knowledge necessary to develop and implement the site health and safety plan and verify compliance.

Other personnel who are needed for hazardous waste site operations and emergency response are identified in accordance with 29 CFR 1910.120 and specific job requirements. Their general functions and responsibilities are defined in the "Site Specific Health and Safety Plan".

The lines of authority, responsibility, and communication are as follows:

* President

* Terminal Manager

* Terminal Supervisor

See Company call sheet for additional employee contact information. Document located in Appendix B.

Our organizational structure is reviewed and updated as necessary to reflect the current employee status and job responsibilities.

1.5 Site-Specific Health and Safety Plan

Our Site-Specific Health and Safety Plan is a program that aids in eliminating or effectively controlling anticipated health and safety hazards. The Site-Specific Health and Safety Plan identifies the hazards of each phase of the specific site operation and is kept on the work site. The Site-Specific Health and Safety Plan addresses the health and safety hazards of each phase of site operation and includes the requirements and procedures for employee protection.

We have a health and safety risk or hazard analysis for each site task and operation identified in the workplan.

Personal protective equipment is used by employees for some of the site tasks and operations being conducted.

Our facility performs air monitoring as follows: A site specific health and safety plan is a complementary program element that aids in eliminating or effectively controlling anticipated health and safety hazards. The site-specific plan must include all of the basic requirements of the overall health and safety program, but with attention to those characteristics unique to the particular site. For example, the site-specific plan may outline procedures for confined space entry, air and personal monitoring and environmental sampling, and a spill containment program to address the particular hazards present at the site.

The site health and safety plan must identify the hazards of each phase of the specific site operation and must be kept on the work site.

In an effort to provide additional security and to address the potential treat of terrorism, all internal and external criminal and terrorist threats have been included in the Environmental Management security plan. Trespassing, unauthorized entry, theft, burglary, vandalism, bomb threats, suspicious packages, or terrorism are sources of external threats. Theft, substance abuse, sabotage, disgruntled employee or contractor actions, and workplace violence, are sources of internal threats. Additional measures of site security have been incorporated to minimize crime and to protect company assets. Criminally caused releases and the security of transportation of listed toxic and flammable substances are real concerns.

Pre-entry briefings must be conducted prior to site entry and at other times as necessary to ensure that employees are aware of the site health and safety plan and its implementation. The employer must also ensure that periodic health and safety inspections are made of the site and that all

known deficiencies are corrected prior to work at the site.

The site health and safety plan, which must be kept on site, addresses the health and safety hazards of each phase of site operation and includes the requirements and procedures for employee protection.

The site specific health and safety plan shall provide for pre-entry briefing to be held prior to initiating any site activity, and at such other times as necessary to ensure that employees are apprised of the site health and safety plan and that this plan is being followed. The information and data obtained from site characterization and analysis work shall be used to prepare and update the site health and safety plan.

Inspections shall be conducted by the site health and safety supervisor or, in the absence of that individual, another individual who is knowledgeable in occupational health and safety, acting on behalf of the employer as necessary to determine the effectiveness of the site health and safety plan. Any deficiencies in the effectiveness of the site health and safety plan shall be corrected as soon as practical to assure continued employee safety.

We have confined space situations in our facility. Therefore, we have established confined space entry procedures. The Confined Space Entry Program and our spill containment program can be located in the Environmental Management Health and Safety Plan.

All Health and Safety Plans are kept in the Health and Safety Database. We conduct inspections to detect deficiencies in the site health and safety plan on an annual basis or as required due to changes in the work environment.

1.6 Contractor Safety

Contractors working at our facility need to be protected from hazards that may be on our premises.

Because we use contractors or subcontractor's services for work in hazardous waste operations, we have informed them of the site emergency response procedures and any potential fire, explosion, health, safety, or other hazards of the operation.

We routinely make the written health and safety program available to any contractor who will be involved with hazardous waste operations or emergency response.

1.7 Post Emergency Response Cleanup

As a qualified cleanup contractor Environmental Management is in most cases on-site to perform those functions. When sub-contractors are utilized it is the responsibility of the primary contractor to ensure that all hazardous substances, health hazards and any contaminated materials such as soil or water is remediated or removed in an appropriate manner to provide complete decontamination of site.

Appendix A

Site Specific Health and Safety Plan

Appendix B

Environmental Management Call Sheet

Appendix C

29 CFR 1910.120

HEARING CONSERVATION PROGRAM

Environmental
MANAGEMENT

2004

1.1 Purpose

The following plan constitutes Environmental Management's Hearing Conservation Program. The document details the policies and procedures utilized to provide those affected employees the highest level of safety in regard to noise in the workplace. There are no areas or workstations at the Environmental Management facility that require a complete hearing conservation program. While there is no regulatory requirement to provide a formal program there are administrative controls, engineering controls and personal protective equipment (hearing protection) available at specified locations and certain job functions, e.g., metal cutting/ grinding, woodworking, etc. The following protective methodologies have been introduced to protect workers from harmful noise:

* Utilizing mufflers on equipment when possible
* Selecting tools and equipment with the lowest A-weighted decibel scale {dbA} exposure when applicable
* Enclosing high noise operations
* Limiting access to high noise areas to unauthorized personnel
* Use of ear plugs or muffs
* Provide awareness training to all effected employees

As an environmental contractor much of the work performed by Environmental Management is for clients at other facilities. In many cases we must meet the hearing conservation requirements of our customers. This often entails additional elements that would be included in a formal program. The following constitute those elements:

1.1.1 Monitoring

When information indicates or when a particular job function or operation has the potential to produce noise levels of 85 decibels or more over an 8 hour time weighted average noise monitoring shall be performed to identify those effected employees to insure maximal employee safety.

1.1.2 Audiometric Testing Program

Should a monitoring program identify noise levels of 85 decibels or greater over an 8 hour time weighted average Environmental Management shall establish, maintain and make available, an audiometric testing program to all effected employees. The program shall be provided at no cost to the employee, and testing shall be performed by a qualified person as stipulated in 29 CFR 1910.95 (g) (3).

1.1.3 Baseline Audiograms

Within six (6) months from an employee's exposure to noise levels above the action level Environmental Management shall provide baseline audiograms against which future audiograms can be compared.

Prior to testing employees there shall have been 14 hours without workplace noise or hearing protection of an adequate design to achieve the objective.

To insure early detection of any standard threshold shift a new audiogram shall be conducted on an annual basis to those employees exposed to workplace noise levels of 85 decibels or greater over an 8-hour time weighted average. This audiogram being compared to the baseline to determine if a standard threshold shift has occurred. If a standard threshold shift has occurred the employee shall be notified in writing within 21 days of determination.

1.1.4 Hearing Protection

If a standard threshold shift has occurred and proves to be work related effected employees who have not been required to wear hearing protection shall be fitted and trained in the proper use, and care of hearing protectors and shall be required to use them.

Those employees who were currently utilizing hearing protection shall be refitted and retrained in their use and provided with protectors offering greater attenuation if necessary.

The Health and Safety Officer has overall responsibility for coordinating Health and Safety programs within the organization. He is also the person having overall responsibility for the Hearing Conservation Program and is responsible for the review and updating of the program, as necessary.

Copies of the written program may be obtained from the Health & Safety Database.

1.2 Monitoring

The monitoring program is in place to provide an ongoing means of determining employee exposure to noise and protect employees based on excessive exposure.

Note: Monitoring is performed on certain job-sites to determine whether additional program elements must be initiated.

When information indicates that any employee's exposure may equal or exceed an 8-hour time-weighted average of 85 decibels, it is necessary to develop and implement an appropriate monitoring program to identify all employees for inclusion in the hearing conservation program and to select proper hearing protection.

Although noise monitoring is not required at the facility, testing is sometimes performed using a sound meter or dosimeter to determine sound levels at field locations to determine unknown

values.

Monitoring is repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that either additional employees may be exposed at or above the action level, or the attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements of noise reduction.

1.3 Audiometric Testing Program

Audiometric testing as defined in 29 CFR 1910.95 is not a required element at the Environmental Management Facility.

1.4 Hearing Protection

The company makes hearing protectors available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to the employees, according to the following method:

The Health and Safety Officer has the responsibility to insure that hearing protection is made available to all affected employees at no cost, and he must ensure strict compliance for usage. Additionally he must ensure understanding and proper use of equipment regarding care and fitting. Training must be repeated on an annual basis.

Environmental Management ensures that employees have a variety of suitable protectors that attenuate (lower) employee exposure at least to an 8-hour time-weighted average of 90 decibels, or 85 decibels or lower for employees who have experienced a standard threshold shift in their hearing, according to the following method

The company has the following varieties of suitable hearing protection for employees to choose from:

* Ear plugs (several varieties)

* Ear Muffs

The company ensures evaluation for adequacy of the hearing protection attenuation for the specific noise environments in which the protector will be used.

The company re-evaluates attenuation whenever employee noise exposures increase to the extent that current hearing protectors no longer provide adequate attenuation, and then provides more effective hearing protection.

1.5 Training and Information

Environmental Management has a hearing protection training program for all employees exposed to noise at or above an 8-hour time-weighted average of 85 decibels. All affected employees participate in the hearing protection training program according to their job function.

A copy of the noise standard is available to affected employees or their representatives and is

located on the Health and Safety database. Noise protection procedures are posted at areas where noise may exceed 85db.

All affected employees receive initial training on the hazards of working in a high noise environment. Additional training is provided and information is updated to be consistent with changes in the protective equipment and work processes encountered.

The following elements constitute the hearing protection training program.

* 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 test procedures

The company makes informational materials pertaining to the Occupational Noise Exposure standard that are supplied to it by OSHA available to affected employees or their representatives when any changes occur.

1.6 Recordkeeping

Recordkeeping is an essential element of the hearing conservation program, since it is the means by which hearing levels are tracked and assessed over a period of years. The company has in place a series of measures to maintain comprehensive and up-to-date records.

The company maintains accurate records of all employee exposure measurements required by the monitoring program of this regulation in the employee medical file. Medical records required by both OSHA and the DOT also require annual hearing tests be performed. (Reference 29 CFR 1910.120 and 134. DOT Part 391.41-49)

The company maintains accurate records of all employee audiometric test records obtained pursuant to paragraph (g) of 1910.95.

The company retains noise exposure measurement records for two years and audiometric test records for the duration of the affected employee's employment plus 30 years. The company provides access to records to employees, former employees, representatives designated by the individual employee, and OSHA, upon request.

Appendix A

29 CFR 1910.95

HYDROGEN SULFIDE PROTECTION PROGRAM

Environmental
MANAGEMENT

2004

1.1 Purpose

The purpose of this program is to insure that all employees of Environmental Management are properly protected from the hazards of hydrogen sulfide (H_2S) in the workplace. The program identifies Environmental Management's commitment to employee health & safety by identifying the potential hazards that the chemical might exhibit when encountered. The program also establishes policies, procedures and standard operating guidelines that must be observed when there exists the potential for employee exposure.

1.2 Scope

This program is applicable to all field technicians who have the potential to be exposed to hydrogen sulfide during field activities, facility activities, or during an emergency response involving a release of hydrogen sulfide. All sub-contractors of Environmental Management shall develop a program that contains, at a minimum, the requirements established within this document.

1.3 Definitions

"Authorized Person" means any person specifically authorized by Environmental Management, whose duties require the person to enter a regulated area.

"Hydrogen Sulfide" H_2S, CAS Registry # 7783-06-4. A colorless gas with a powerful nauseating smell of "rotten-eggs". The odor is a poor warning property because hydrogen sulfide exposure quickly incapacitates the olfactory nerve. The gas is heavier than air and tends to collect in low areas. Hydrogen sulfide concentrations of between 4.3% and 46% in air constitute a flammable or explosive atmosphere. Toxic by-products, such as sulfur dioxide are also formed during the combustion process. Hydrogen sulfide is incompatible with oxidizing agents such as nitric acid and chlorine trifluoride, and may react violently or ignite spontaneously.

"Emergency" means any occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of a control system, which may or does result in an unexpected significant release of hydrogen sulfide.

"Employee Exposure" means any exposure of hydrogen sulfide by any exposure route.

"Regulated Area" means any area where the potential of exposure exists, those areas requiring personal protective equipment (PPE), and any area where airborne concentrations can be reasonably expected to exceed the Permissible Exposure Limits established by OSHA. PEL = 10 PPM

1.4 Background

Hydrogen sulfide is a colorless gas with an offensive odor, and is classified as an inorganic gas. Hydrogen sulfide presents a potential hazard to employees as an unwanted by-product in many different industries and applications. To insure employee protection both employers and employees must be aware of the physical properties of the chemical, how it effects the human body, and the necessary actions that must be observed during emergency situations. This Health and Safety Program has been developed to ensure that all personnel shall be properly trained in hydrogen sulfide awareness, handling procedures and contingency procedures.

1.5 Hazardous Locations

While hydrogen sulfide can be found in a variety of locations, there are specific operations or processes that require a high level of employee awareness due to the increased potential of encountering the chemical. The following list, although not conclusive is representative of those locations requiring due vigilance and regard.

1.5.1 Drilling Operations

A. Water from sour crude wells

B. Blowouts

1.5.2 Tank Gauging

A. Production

B. Pipelines

C. Refineries

1.5.3 Field Maintenance

A. Tank Batteries

B. Wells

1.5.4 Emergency Response activities at any location previously mentioned

1.5.5 Transportation Accidents

1.5.6 Releases within a process facility

1.5.7 Sewers, digesters, excavations

1.6 Health Effects

1.6.1 Inhalation

Hydrogen sulfide is a poison gas (Inhalation Hazard Gas 2.3) as identified by the DOT. It is toxic by inhalation and high concentrations of hydrogen sulfide causes respiratory paralysis, leading to full arrest. Pulmonary edema is often observed at concentrations between 250 and 600 ppm, and has been documented following long exposures to concentrations as low as 50 ppm.
The sense of smell becomes rapidly fatigued and cannot be used as a warning of exposure.

1.6.2 Eye Effects

Low concentrations will generally cause irritation to the conjunctiva. Repeated exposure to low concentrations is reported to cause conjunctivitis, photophobia, tears, pain and blurred vision.

1.6.3 Skin effects

May irritate skin upon contact.

1.6.4 Ingestion Effects

Ingestion is unlikely. Hydrogen sulfide will irritate the mucous membranes causing a burning feeling and excess salivation. Irritation of the gastrointestinal tract may also occur.

Any pre-existing eye, skin, respiratory or central nervous system disorder may be aggravated

1.7 Air Monitoring/ Detection

The permissible exposures limits (PEL) established by OSHA are 20 PPM as a Ceiling and 50 ppm as a (10-min max peak). The American Conference of Governmental Industrial Hygienist has established a TLV/TWA of 10 ppm and a TLV/STEL of 15 ppm. The IDLH for emergency response is 100 ppm.

It is the policy of Environmental Management to perform air monitoring when any release of hydrogen sulfide is suspected. The hydrogen sulfide specific sensor (calibrated to alarm at 20 ppm) would be the appropriate monitoring instrument and shall be utilized in all site characterization, confined space entry, underground excavations or trenching sites and all other previously mentioned locations where the potential release of hydrogen sulfide exists.

All Environmental Management employees shall perform initial monitoring and site characterization in at least Level B protection. Level B protection is defined as the highest level of respiratory protection consisting of a Positive Pressure Self Contained Breathing Apparatus (SCBA) or a Supplied Air Respirator with a 5-minute escape cylinder. Splash protection is contingent upon release conditions.

All entries into a confined space must confirm to those minimum guidelines established in the Environmental Management Permit Required Confined Space Entry Program (29 CFR 1910.146). When Level B protection is not worn or notification of release is by alarm, all employees will evacuate upwind to a safe area of refuge. Additional information on evacuation can be found in the Emergency Response Plan or in the Site Specific Health and Safety Plan for off- facility applications.

Recognizing the hazards that exist during an emergency response or on a clean-up project is an important consideration that all employees must understand. It is the supervisor's responsibility to inform all employees of those site-specific contingency plans that effect employee safety during field operations.

1.8 Information and Training

All employees of Environmental Management are provided training in accordance with 29 CFR 1910.120 (HAZWOPER), 29 CFR 1910.1200, and a variety of other chemical specific, process specific, or function specific applications. Hydrogen sulfide training is provided as a component of the HAZWOPER training and as prior to working on job site where hydrogen sulfide could be encountered.

Appendix A

Hydrogen Sulfide Material Safety Data Sheet (MSDS)

Volume 4

Incident Investigation and Reporting

1 Purpose

Environmental Management, Inc. developed this program for the intent to reduce incidents and near misses to zero. This program will reinforce the companies' commitment to safety. Reporting all situations is the key factor that will allow this program to be effective. **All incidents and/or near misses must be reported**. The reporting system will inform the Senior Management Team that hazardous circumstances occurred that could have or did result in; death, illness, injury, environmental, or property damage.

After the initial verbal report of an incident/near miss to the immediate supervisor/project manager an incident/near miss first draft report will be compiled within 24 hours. The supervisor will notify the Coordinator that he/she is working for. Then after the report is turned in and completed an investigation will begin to find the root cause of the event. Except in the case of a catastrophe or fatality then the investigation will begin immediately and all the proper authorities will be made aware of the situation. Incase of such of an event Environmental Management, Inc. will hire an expert in Incident investigation to oversee and conduct the investigation.

The investigation is a crucial part of the program. The investigation will uncover the corrective actions to ensure a safe workplace. If a corrective action does not take place the likelihood of the same type incident/near miss to reoccur is increased.

1.1 Reporting

In the event of a fatality or catastrophic event OSHA will be notified with in eight hours by calling 1-800-321-6742. The information OSHA expects is listed below as stated in 29CFR 1904.39.

- The establishment name
- The location of the incident
- The time of the incident
- The number of fatalities or hospitalized employees
- The names of any injured employees
- Your contact person and his or her phone number, and
- A brief description of the event

The host client will be notified with in 24 hours of an incident occurring on site.

1.2 Definitions

Incident – An accident the result of illness, injury, property damage, or environmental damage.

Near miss – It is an injury that does not require any more attention than basic first aid, minor damage or no damage to property or the environment.

Catastrophic event – Hospitalization of three or more employees.

2 Investigation

The investigation will assist in finding the root causes. For example poor housekeeping may cause slips, trips, and falls. The investigation will also help give suggestions for the corrective actions to prevent future occurrences or similar situations from arising. The investigation will allow for documentation of the facts for records. The investigation team will consist of non bias employees. The investigative group can consist of but is not limited to: EH&S Coordinator, Safety Committee members, Emergency Response Coordinators, Project Managers, Supervisors, and/or Senior Management. These employees will be trained in the companies Incident Investigation procedures.

The size of the investigation group will very on the severity of the incident that occurs.

Environmental Management's investigation will be that of solid fact finding and not an investigation based on "hear say or fault finding". There will be a Root Cause Analysis (RCA) in identifying the underlying problem.

2.1 Investigative steps

Make sure to incorporate the five W's and an H scenario: who, what, when, where, why and how? Provide fundamental questions for the data identification. A camera, sample containers, flashlight, Caution/Danger tape, and tags shall be on vehicles to assist in the investigation process.

1. The first and foremost step is to assess the situation and be sure it is safe to enter then provide the medical attention that is required for the effected employee(s). If there is a need for off site medical attention then a company representative will accompany them to ensure that all the injured employee(s) are taken care of.

2. Then make sure that the area is secure and no one else can be injured. Evacuate the immediate area that the incident occurred. Pay close attention to all the factors that are present, lock out any equipment that might have contributed to the situation. If there is a need to assign an employee to make sure that no unauthorized entry is made then one will be made available.

3. Find all witnesses that were involved in the situation. Witnesses could have seen it happen or heard it happen. Find out what they know. The interviews will consist of open questions so the witness statement will be as accurate as possible.

4. Make sure to photograph the position of all equipment, prior to any change or movement. All evidence needs to be tagged and a chain of custody needs to be signed. Also photograph after each piece of evidence is removed. The reason for this is that there might be more evidence uncovered after the removal of larger components.

5. Be sure to collect all the evidence and catalog it accordingly

6. Review all the data make sure all pre/post trip inspection reports have been filled. Be sure to review and find all permits and JSA's have been filled out and that the employee has been properly trained. Make sure to identify any trends that the Team has found.

7. Prepare the report. Be very careful in this step be sure you have done all the steps aforementioned correctly and accurately to your Investigation Teams knowledge.

8. After you follow all of the steps the Investigation Team should be able to come up with the root cause analysis. Find the corrective action then execute it. Communicate with other employees what the action is and how to follow the corrective action plan. Before work is to be continued a tailgate meeting will take place to inform employees on the problem and the new corrective action.

9. Then follow up and find out if the Investigation Team suggested the right corrective action. Make sure every one is following the corrective action.

Ladder Safety

Section 14 A

1.1 Purpose

The purpose of this program is to provide guidance to the employees of Environmental Management in the safe use of ladders in the workplace. The primary objective is to ensure a workplace free of any recognized health and/or safety hazards associated with the use of any ladder.

1.2 Scope

The requirements of this section apply to all facility and field activities that may require the use of a fixed ladder, extension ladder, step ladder and all other ladders as defined in 29 CFR 1926.1053. The minimum specifications for load rating, testing, and performance rating can be found in the previously stated standard.

1.3 General Requirements

1.3.1 To provide a safe work platform all ladder rungs, cleats, and steps shall be parallel, level and uniformly spaced when the ladder is in position for use.

1.3.2 Rungs, cleats, and steps of portable ladders shall be placed not less than 10" apart, nor more than 14" apart as measured between centerline.

1.3.3 Ladders shall only be used for the purpose for which they were designed.

1.3.4 Ladders shall not be loaded beyond the maximum intended load for which they were built, nor beyond their manufacturer's rated capacity.

1.3.5 The top or top step of a stepladder shall not be used as a step.

1.3.6 Ladders shall be inspected by a competent person for physical defects on a periodic basis and after any occurrence that could affect their safe use. A defect shall constitute immediate removal from service and ladder shall be tagged/marked or otherwise blocked so as not to be used until repairs are made.

1.3.7 When ascending or descending a ladder the user shall face the ladder.

1.3.8 Each employee shall use at least one hand to grasp the ladder when progressing up or down the ladder.

1.3.9 An employee shall not carry any object or load that could cause the employee to lose balance and fall.

1.3.10 When portable ladders are used to access an upper landing surface, the ladder side rails shall extend at least 3 feet above the upper landing surface to which the ladder is used to gain access. When not achievable the ladder shall be secured at its top to a rigid support that will not deflect, and a grabbing device shall be utilized to assist in mounting and dismounting the ladder. Under no circumstances shall the extension be such that ladder deflection under a load would, by itself cause the ladder to slip off its support.

Non self supporting ladders shall be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately 1/4 of the working length of the ladder.

Lead Awareness

1.1 Purpose

Environmental Management personnel may, from time to time, be involved with projects where employees have the potential to be exposed to lead in the breathing zone above the permissible exposure limit (PEL). A variety of products containing elemental lead, organic lead or other compounds containing lead, that when disrupted, pose a risk to the safety and health of individuals working in or near the contaminated area. Because of the work Environmental Management performs for its clients, and the locations where the work occurs, a comprehensive program of engineering controls to minimize worker exposure is in many cases impractical. Environmental Management will rely on Personal Protective Equipment as outlined in the Site Safety and Health Plan, and on air monitoring to provide personnel with adequate protection from lead exposure as measured at each incident. In the event that work is being preformed on a multi-contractor worksite that causes a potential for lead exposure then Environmental Management, Inc. will use the proper personal protective equipment to provide protection to all Environmental Management employees on site.

This program will be evaluated at least annually or in response to identified problems or inadequacies identified by exercise or implementation of the Lead Exposure Control Program.

1.2 Site Safety and Health Plan

The Site Safety and Health Plan is part of the Environmental Management Health and Safety Plan and is in the possession of all Environmental Management Supervisors. A copy of the plan is also available from the Safety Officer, or may be obtained from the Safety Database. When lead is suspected or identified as a potential contaminate, it will be included as one of the site hazards in the Site Safety and Health Plan and a copy of the MSDS or other appropriate chemical information will be attached to the Site Safety and Health Plan. There are various locations where lead may be present which may include but is not limited to lead base paint sampling and abatement, gun range remediation, and industrial locations. All site personnel will be briefed on the site hazards prior to work commencing at any site. The primary objective of any safety program is to provide the highest levels of employee safety by utilizing the most effective and reliable systems, methods or PPE available. Environmental Management has incorporated various engineering controls to eliminate, reduce or dilute the concentration of an airborne contaminant. Ventilation systems, portable fans, vacuum systems are available and should be used whenever lead products are being handling at the Guthrie facility. It is also the responsibility of each employee to utilize any engineering controls at customer locations. Because there are no ongoing lead emitting operations at the Guthrie facility no controls have been specifically established for that purpose, although the current controls are effective when lead is handled on a non-routine basis. Administrative controls in the form of training and SOP's have been established to address the occasional handling of

lead products. As previously outlined the PPE and respiratory program provides adequate protection for employees during aforementioned activities.

1.3 Employee Training

All employees who have the potential to work in an area where there exists a possibility for exposure to airborne lead above the action level, (30 micrograms per cubic meter of air), or where the exposure may lead to skin or eye irritation shall participate in a training program prior to initial assignment, and annual training thereafter that includes the following elements as a minimum. All training will be documented and the documents will be kept in the training coordinator's database along with the main training file.

- Employees shall be informed of the contents of 29 CFR 1910.1025 and all attached appendices
- The operational applications which could result in worker exposure above the action level
- The purpose, proper selection, fit, use, and limitations of respiratory protection
- Explain the purpose and describe the medical evaluation program, medical removal protection program, and adverse health effects associated with exposure. Employees will know that any material containing lead is poison such material in dust form if inhaled or ingested, and that there is a potential to cause damage to the nervous system if there is long term exposures. Particular attention must be given to the teratogenic effects of exposure.
- All employees will be trained in the proper decontamination procedures at a minimum they wash their face and hands after any possible exposure to lead.
- Engineering and administrative control methodologies associated with job functions
- The contents of any compliance plans that are applicable
- Instructions regarding the use of chelating agents not prescribed by a licensed physician

1.4 Air Monitoring Program

Air monitoring shall be performed as required to ensure that no employee is exposed to concentrations of airborne lead greater than fifty (50) micrograms per cubic meter of air (50 ug/m^3) averaged over an eight (8) hour period. Air monitoring shall be performed by

a qualified person in accordance with accepted industrial hygiene practices and the recommendations established in 29 CFR 1910.1025 and its appendices.
There are no operations or activities where lead is being released for extended periods of time at the Guthrie facility. The monitoring requirements established for shift work is not applicable and would only be relevant during a clean-up/remediation activity or during an emergency response where unknown concentrations might be present in the breathing zone. A combination of air monitoring and proper respiratory protection shall be utilized on all such applications. When a client or customer has developed air monitoring procedures and/or policies Environmental Management activities shall be in accordance with their program. It is imperative that all activities performed off-site comply with 29 CFR 1910.1025 (d) (6) (i) - (iii).

Note: As prescribed by OSHA, engineering controls should be used whenever possible to reduce airborne concentrations. In addition administrative controls and worker practices shall be selected before utilizing personal protective equipment.

1.5 Respiratory Protection

Respiratory protection for lead exposure shall be determined by air monitoring performed at each job location where the potential for employee exposure exists. Respiratory protection shall consist of a NIOSH approved Air Purifying Respiratory with the appropriate cartridge/filter (for known concentrations of lead between the PEL and the IDLH) or a NIOSH approved Atmosphere Supplying Respirators (Airline or SCBA) for unknown or above the IDLH concentrations. Respiratory protection requirements are outlined in the Environmental Management Health and Safety Plan, prepared in accordance with 29 CFR 1910.134. In addition to the requirements outlined in the Environmental Management Respiratory Program the following elements shall apply when employees are working in an area where concentrations of airborne lead require additional safeguards.

- Periods necessary to install or implement engineering or work-practice controls
- Work operations where engineering or worker practices are not sufficient to reduce employee exposures to or below the permissible exposure limit (PEL)
- When an employee requests a respirator
- Powered air-purifying respirators shall be available to employees who request or require additional protection when using negative pressure devices.

1.6 Personal Protective Equipment (PPE)

Personal Protective Equipment for identified lead exposures shall be identified in the Site Safety and Health Plan and will be consistent with the Environmental Management

Health and Safety Plan, prepared in accordance with the provisions of 29 CFR 1910.132-140.
All required chemical PPE such as disposable outer garments, gloves, goggles, etc shall be provided by Environmental Management at no cost to the employee. Work uniforms shall be properly bagged for cleaning and repair by uniform supply service when applicable. All employees shall adhere to appropriate decontamination procedures when doffing reusable garments and/or equipment and shall properly dispose of all non-reusable items. Field supervisors are responsible to ensure that proper decontamination and hygiene facilities are provided and monitored.

1.7 Medical Monitoring Program

In addition to the medical monitoring requirements established in the comprehensive Environmental Management Medical Surveillance program. The following elements shall be addressed when employees are required to perform tasks where the potential to be exposed to airborne lead at concentrations above the "Action Level" for more than 30 days.

1.7.1 All medical examinations shall be performed under the direction of a licensed physician, at a reasonable time and place, with no cost incurred by the employee

1.7.2 Biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels for covered employees

1.7.3 At 6-month intervals when warranted

1.7.4 2-month intervals when analysis indicates a blood level at or above 40ug/100g of whole blood

1.7.5 2-month intervals shall continue until 2 consecutive blood samples indicate levels below 40 ug/100g of whole blood

1.7.6 Monthly sampling for employees removed from exposure to lead due to an elevated blood level

1.7.7 Follow-up sampling in accordance with 29 CFR 1910.1025 (j)(2)(ii)

1.7.8 A detailed work and medical history in accordance with 29 CFR 1910.1025 (j)(3)(ii)(A)

1.7.9 Employee notification. Within five working days after the receipt of biological monitoring results, the employer shall notify in writing each employee whose blood lead levels exceeds 40 ug/100g.

1.7.10 A thorough physical examination as outlined in 29 CFR 1910.1025 (j)(3)(ii)(B)-(F)

1.7.11 Multiple physician review mechanism as addressed in 29 CFR 1910.1025 (j)(3)(iii)-(j)(3)(vi)

1.7.12 An effected employee shall be notified within 15-days to seek a second physician's opinion

The requirements contained within the standard are complex and should be consulted to determine where specific actions are to be taken.

1.8 Hazard Communication

Appropriate signage shall be posted in all operational areas to communicate the hazards to employees. Decontamination areas, "Do Not Enter", and any other pertinent information shall be clearly defined in English and any other language necessary to insure compliance.

1.9 Summary

This program has been established to provide Environmental Management employees with the necessary information to insure that every measure has been taken to provide the safest workplace possible. Employees are urged to comply with this and other programs and to actively participate in the overall safety program. If you have ideas or comments that will improve the program please contact you're immediate supervisor or the Health and Safety Officer.

29 CFR 1910.125

Lifting Mobile Equipment / Powered Industrial Trucks

Environmental
MANAGEMENT

2017

Mobile Equipment/ Powered Industrial Trucks

1.1 Purpose

Environmental Management Inc. Mobile Equipment/ Powered Industrial Trucks program is put in place to ensure that only qualified and authorized personnel operate equipment. The purpose of this program is to protect the health and safety of all employees assigned to operate powered industrial trucks and to comply with the requirements of 29 CFR 1910.178 (Powered Industrial Trucks).

- OSHA Standard 29CFR 1910.178 (Powered Industrial Trucks)
- ANSI/ISTDF B56.1 – 2009 (Safety Standard for Low Lift and High Lift Trucks)
- Valid driver's license and a good driving record

1.2 Key Responsibilities

EHS Director

- The designated Safety Manager is responsible for developing and maintaining the program and develop specific policies and procedures pertaining to the operation and maintenance of powered industrial trucks. Implement a training program based on the general principles of safe truck operation, the type of vehicle(s) being used in the workplace, the hazards of the workplace created by the use of the vehicle(s). Coordinate the training and performance testing of Powered industrial truck operators. Maintain the training certification records and performance tests of employees included in the training sessions. Periodically review the effectiveness of the program.

Management/ Supervisors

- Responsible for the implementation and maintenance of the program and ensuring all assets are made available for compliance with the plan. Managers and Supervisors are responsible for enforcing the program and ensuring only qualified & authorized operators are operating equipment. Ensure that employees who operate powered industrial trucks/equipment have received appropriate training. Provide observations and feedback to operators to ensure safe equipment operation. Ensure that the vehicles under their responsibility are properly inspected and maintained in a safe operating condition.

Employees

- All shall be familiar with this procedure and the local workplace vehicle safety program. Follow all requirements, report unsafe conditions, and follow all posted requirements. Operate powered industrial trucks in a safe manner. Inspect powered industrial trucks at the beginning of each work shift and complete the appropriate inspection forms if requested. Report equipment defects and/or maintenance needs to the supervisor or shop manager immediately.

1.3 Qualifications

Only qualified and authorized operators are allowed to operate EMIs equipment. To be qualified, operators must be familiar with the operation of the equipment as well as all of the guidelines in

this program. To be authorized, operators must be trained by a certified trainer on the specific equipment to be operated, have approval from the operations manager and supervisor on site and have all of the paperwork and company training complete and on file with the Safety Coordinator.

1.4 Training

Only employees who have successfully completed training in accordance with 1910.178(l) will be permitted to operate a powered industrial truck.

- Training will consist of a combination of formal instruction (lecture, discussion, and video) practical training (demonstrations performed by the trainer and practical exercises performed by the trainee, and evaluation of the operator's performance in the workplace.
- Operator training and evaluation will be conducted by persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.
- The formal (classroom) training will include a review/discussion of the following topics:
    1. The factors that affect the stability of the truck.
    2. The safe operation of powered industrial trucks.
    3. Truck controls and instrumentation; where they are located, what they do and how they work.
    4. The similarities and differences between powered industrial trucks and automobiles.
    5. Steering and Maneuvering.
    6. The proper techniques of battery charging and refueling.
    7. The inspection of powered industrial trucks.
    8. Vehicle capacity.
    9. Load manipulation, stacking and unstacking.
    10. Pedestrian traffic in areas where the vehicle will be operated.
    11. Other unique and potentially hazardous environmental conditions in the workplace that could affect the safe operation of the vehicle.
- Hands on training will then be conducted by a competent trainer. Trainee will have to maneuver through a controlled course and demonstrate they can operate the equipment and all the functions safely.
- An evaluation of each operator's performance will be conducted at least once every three years.
- Training will be documented and filed in the Safety Coordinators office. The certification will contain each employee's name, the date of training and the name of the instructor.

1.5 Unsafe Behavior

Any personnel observing unsafe behavior must immediately stop operation and complete written documentation, while also reporting the unsafe acts to management and the EHS director. The

operator must then be retrained and evaluated to determine whether or not he/she is fit to continue to operate. Unsafe operations can warrant disciplinary action up to and including termination.

1.6 Operator Responsibilities

Once an employee is trained to be an operator, he or she must follow general guidelines for operating company equipment to maintain and operate the equipment the safest way possible. Authorization to operate company equipment can be revoked at any time.

- All equipment should be inspected by the operator prior to each use. This includes checking all fluids, brakes, back up alarm systems, steering, lighting, and control system.
- The operator should also ensure that the back-up alarm is operating while the equipment is backing up.
- If a piece of equipment is found defective in any way it should immediately be removed from service, the shop superintendent should be informed and the equipment should be locked out/tagged out for repair.
- Prior to operation the equipment should be given ample time to warm up to prevent equipment damage. All equipment should be maintained in a safe and clean manner.
- Operators are to wear their seatbelt at all times prior to starting the engine and during operation when so equipped. All mobile equipment with a roll bar is required to have seatbelts that are worn at all times.
- Operators are only to use the equipment in the manner in which it was designed and should chose equipment based on what is appropriate for the task at hand. Operators should not load the equipment beyond its established load limit should ensure that they are secured for safe transport and unloading.
- Passengers on equipment are strictly prohibited unless the equipment or vehicle is equipped to handle passengers and in that instance passengers must wear their seat belt.
- Eye protection should be worn when operating without the protection of a closed cab.
- When fueling, operator shall shut off the engine before filling the fuel tank and shall ensure that the nozzle of the filling hose is inside with the filling neck of the tank. No one shall be on the vehicle during fueling operations except as specifically required by design. There shall be no smoking or open flames in the immediate area during fueling operation.

1.7 Program Evaluation

The Mobile Equipment/ Powered industrial Truck program shall be evaluated on an annual basis utilizing the protocols set forth by Occupational Health and Safety. The evaluation team will consist of a Manager and the Occupational Health and Safety Coordinator. Environmental Health and Safety will define the scope of the evaluation. The final report will be developed by the Operations Manager and EHS Coordinator utilizing the information received during the evaluation. The deficiencies determined in the report will be documented and corrective action plans will be developed.

Appendix A
29 CFR 1910.178

Part Number: 1910

Lockdown Procedure

Lockdown Procedure

1. A member of management will announce, "LOCKDOWN" over the intercom or a member of management will announce the lockdown in person:
   a. Everyone inside of the Office building is to stay where they are. They should remain at their desks and continue to work. This is not an excuse to congregate in the lobby nor is it an excuse to congregate in the hallways. Personnel should remain in their offices:
      i. Close their blinds
      ii. Lock their office door if applicable
      iii. The receptionist will move to The Reports Coordinator Office
      iv. Cancel all appointments
   b. Everyone inside of the shop is to stop work temporarily and congregate in the Shop Locker Room.
   c. The doors shall be closed and secured
      i. Everyone outside is to quickly glance around their surroundings for any unidentified personnel or anything suspicious.
      ii. If suspicious behavior or unidentified personnel are observed contact management immediately then quickly move to either the Truck Barn, the Shop Locker Room, the Office, or the Product Distribution Area.
      iii. If it appears that they are able to safely walk to the Shop Locker Room then you should promptly walk to the Shop Locker Room after securing all doors.
   d. Management will arrange for the securing of all of the equipment.
2. The acting yard manager will begin to text all employee phones with the single word LOCKDOWN
3. The receptionist will begin taking the steps necessary to determine exactly what personnel are at the facility
4. Personnel who are already away from the facility will be directed to stay away
5. A member of management will lock the Office doors including the Shipping and Receiving door
6. A member of management or a supervisor will secure the shop.
7. The front gate will be closed.
8. The receptionist will call over to the Shop Locker Room for a head count.
9. If any personnel are not accounted for a member of management will attempt to locate them using their cell phones.
10. Once all personnel are located management will determine if any personnel in the yard can be safely moved to the Office or Shop Locker Room.
11. Once the Shop has been secured work can resume in the shop
12. A member of management will announce over the intercom once the lockdown has been lifted and normal work operations can resume.

If the lockdown has to take place over a reasonable lunch time then a member of management will make arrangement for food for the staff. Food will be delivered to the Break Room and the Shop Locker Room.

Alternatively, if they choose personnel may leave the facility for the day. However, it is important to stress that those personnel may not return to the EMI facility once they have decided to leave. PTO may be used for this time off.

LOCKOUT/TAGOUT PROGRAM

Environmental
MANAGEMENT

2013

1.1 Purpose

The Environmental Management Lockout/Tagout program shall establish the company requirements for the lockout of energy isolating devices whenever maintenance or servicing is conducted on machines or equipment in accordance with the requirements of 29 CFR 1910.147, OSHA's minimum requirements for the control of hazardous energy. This program shall be used to ensure that all machinery or equipment is stopped, isolated from all potentially hazardous energy sources and locked out before employees perform any servicing or maintenance where the unexpected activation or start-up of the machine or equipment or release of stored energy could cause injury. The Lockout/Tagout Program is intended to prevent accidents and injuries to employees who may be harmed by the unexpected start-up of a piece of equipment or by the release of stored energy.

1.2 General Information

Lockout is the preferred method of isolating machines or equipment from energy sources, and is defined as the placement of a locking device to block the flow of energy from a power source to a piece of equipment.

Tagout is to be performed in the place of lockout only when there is no means of effectively locking out a machine. Tagout is defined as the process of attaching a tag to a disconnect switch or other energy isolating device to warn others not to restore energy to the tagged equipment.

1.3 Responsibilities

1.3.1 Management

A. The Training Officer shall maintain the overall responsibility for ensuring that authorized, affected and other persons are properly trained on lockout/tagout procedures.

B. The Health and Safety Officer shall have the responsibility for developing and maintaining the Lockout/Tagout Program within the facility, and performing updates as necessary.

C. The Health and Safety Officer shall ensure that all equipment, supplies and other devices needed to adequately perform lockout/tagout procedures are available and maintained in good working order.

1.3.2 Authorized Employees

Authorized Employees are those employees designated and authorized by Environmental Management to physically lock or tag out a machine or piece of equipment in order to perform service or maintenance work. Authorized Employees should be familiar with the

procedures utilized to lock or tag out a particular machine or piece of equipment, and they have the additional responsibility for developing the lockout/tagout procedures for those items. The Authorized Employees will use the Lockout Control Form in *Appendix B* of this Section to outline the procedures for any equipment, which falls under this standard. The following persons are designated Authorized Employees:

A. Terminal Manager

B. Maintenance Supervisor

C. Health and Safety Officer

1.3.3 Affected Employees

Affected Employees are those employees who either operate equipment that can be locked or tagged out, or work in an area where lockout/tagout is performed. Affected employees are not authorized to perform the actual lockout/tagout procedure, however they must be familiar with the lockout/tagout procedures, capable of determining when equipment should be locked or tagged out for service and recognizing that equipment has been either locked or tagged out. Affected Employees shall be verbally notified when any equipment they use has been locked or tagged out. The following persons are designated Affected Employees:

A. Terminal Supervisor

B. All shop employees

C. All field technicians

1.3.4 Other Employees

Other Employees work in an area where lockout/tagout is used and must know why those procedures are performed, but not how, and must never attempt to restart equipment that has been locked or tagged out. All Environmental Management employees not listed as an Authorized or Affected Employee are designated as Other Employees.

1.4 Lockout/Tagout Equipment

The following section outlines the equipment that shall be used during lockout/tagout procedures and the contents of each lockout/tagout kit. The lockout/tagout kits are located in the tank cleanout and rescue trailers. There is also a terminal lockout/tagout kit located in the shipping office..

1.4.1 Chains

Three lockout chains cut to a length of 36 inches shall be included in every lockout/tagout kit. The chains must be substantial enough to prevent early or accidental due to excessive force. These chains shall be used to secure unusual energy isolating devices that are difficult to lock out using conventional means and can be used in a wide variety of applications.

1.4.2 Electrical Panel Lockout Bar

The electrical panel lockout bar shall be stored in the terminal lockout/tagout kit and is marked with a "LOTO" label. The electrical panel lockout bar shall be used to secure any panel door measuring 14 to 20 inches and shall prevent panel cover removal by covering a minimum of two panel screws.

1.4.3 Locks

All lockout locks shall be identified with a "LOTO" label attached to the front plate. In addition, individual lockout locks located in each kit shall also be identified by a colored band at the base and have a matching color coded key. There shall be a minimum of five different colored locks located in each lockout/tagout kit. Lockout/tagout locks shall be used to secure potential energy sources and shall not be used for any purpose other then lockout operations.

1.4.4 Lockout Box

All lockout boxes shall be identified with a contrasting "LOTO" label attached to both sides a lockable key storage box and there shall be a minimum of one lock box stored with each lockout/tagout kit. The lock box is used to secure the primary lock key during multiple lockout/tagout applications.

1.4.5 Lockout Tags

There are two different lockout tags that shall be used to label locked out equipment. The first tag shall indicate equipment lockage and it shall be marked with bold contrasting lettering which states warnings such as "DANGER" and/or "DO NOT OPERATE". These tags shall be located in every lockout/tagout kit. The second tag shall indicate the employee locking out the equipment by means of individual lockout tags which contain the employee name and a photographic picture. Employees will be held responsible for maintaining a copy of their individual lockout/tagout tag.

1.4.6 Multi Lock Hasps

There shall be a minimum of two scissor jaw multiple lock hasps located in each lockout/tagout kit. These multiple lock hasps shall be designed to hold six different padlocks and can also be used to lockout electrical panels that utilize lever actuation.

1.4.7 Plug Lockout Box

The minimum of one fully encapsulating plug lockout box shall be stored in each lockout/tagout kit. The plug lockout box is designed to prevent accidental reconnection of electrical cords and keeps unauthorized personnel from energizing select machinery.

1.5 Lockout/Tagout Procedures

The following procedures shall be utilized whenever a piece of equipment or machinery is to be locked or tagged out for a period of time in order to conduct service or maintenance.

1.5.1 Preparation for Shutdown

Before an authorized or affected employee turns off a machine or piece of equipment, the Authorized Employee shall have knowledge of the type and magnitude of energy, the hazards of the energy to be controlled, and the method or means to control the energy. The Authorized Employee should verbally notify any Affected Employees of the lockout procedure to be performed.

1.5.2 Lockout/Tagout Shutdown

The machine or equipment shall be turned off or shut down using the procedures established on the Lockout/Tagout Form for the particular machine or the equipment. All energy isolating devices (switches, levers, etc.) that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s) (i.e. turned to an OFF or SAFE position). An orderly shutdown must be utilized to avoid any additional or increased hazards to employees as a result of equipment stoppage. Once the machine or equipment has been shut down, the power at the main energy source must also be removed.

1.5.3 Lockout/Tagout Device Application

A. Authorized employees shall affix lockout/tagout devices to each energy-isolating device. All lockout devices, where used, shall be affixed in a manner that will hold the energy isolating device in a "safe" or "off" position. Tagout devices, where used, shall be affixed in such a manner as to clearly indicate that the operation or movement of energy isolating devices from the "safe" or "off" position is prohibited. The name of the person or persons performing lockout/tagout shall be communicated at the point of energy control.

Group Lockout or Tagout

When servicing or maintenance is performed by a crew, craft, department or other group, they shall utilize a procedure which affords the employees a level of protection equivalent to that provided by the implementation of a personal lock-out or tag-out device.

An authorized employee shall have the primary responsibility to ensure that multiple employees working under a group lock/tag-out procedure are safe and exposures have been evaluated and addressed. The lockout/tagout procedure shall comply with 29 CFR 1910.147 (f)(3)(ii)(D). A process to ensure the safe attachment and removal of locks, the changing of employees, unexpected start-up or any other safety or health issue must be addressed in the Site specific Safety & Health plan.

B. Where tagout devices are used, the tag attachment shall be fastened at the same point at which the lock would have been attached. Where a tag cannot be affixed directly to the switch, the tag shall be located as closely as safely possible to the switch and in a position that will be immediately obvious to anyone attempting to operate the device. The name of the person or persons performing the tagout shall be affixed on the tag at the point of energy control.

C. In general, the following guidelines pertain to tagout devices:

(1) They serve as visible, written warnings not to restore energy

(2) They DO NOT serve as physical restraints

(3) They must be securely attached by hand

(4) They must be worded with clear and legible warnings

1.5.4 Stored Energy

Following the application of lockout or tagout devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained, and otherwise rendered safe. If there is a possibility of re-accumulation of stored energy to a hazardous level, verification of isolation shall be continued until the service or maintenance is completed, or until the possibility of such accumulation no longer exists. Examples of releasing stored energy would include: bleeding off of air, draining hydraulic valves, grounding circuits, discharging capacitors, etc.

1.5.5 Verification of Isolation

Prior to beginning any work or maintenance on machines or equipment that have been locked or tagged out, the Authorized Employee shall verify that isolation and deenergezation of the machine or equipment has been accomplished, even though isolation is performed prior to shutdown and is checked at that point. This can be accomplished by turning the power switch of the machine or equipment on and off.

1.6 Release from Lockout/Tagout

Before lockout/tagout devices are removed and the energy is restored to the machine or equipment, procedures shall be followed and actions taken by the Authorized Employee to ensure the following:

* All guards, protective devices and equipment parts are in place

* All non-essential items have been removed and the machine or equipment components are operationally intact

* All employees have been safely positioned or removed from the area

* All Affected Employees have been notified that the lockout or tagout devices have been removed

1.6.1 Lockout/Tagout Device Removal

A. The employee who applied the device shall remove each lockout/tagout device from the energy-isolating device. When the Authorized Employee who applied the device is not available to remove it, that device may be removed under the direction of the employer, the Health and Safety Officer, or the Training Officer, provided that specific procedures and training for such removal have been developed, documented and incorporated into the employer's energy control program. The employer shall demonstrate that the specific procedure provides equivalent safety to the removal of the device as if the employee who applied it removed it.

B. The specific procedure for removal of a device when the installing person is not available shall include, at a minimum, the following elements:

(1) Verification by the employer that the Authorized Employee who applied the device is not at the facility

(2) Reasonable efforts to contact the Authorized Employee to inform him/her that his/her lockout or tagout device has been removed

(3) Ensure that the Authorized Employee has the knowledge that the device has been removed before returning to work

1.6.2 Equipment Startup

Once all steps have been taken to ensure that the area is safe, the following procedures shall be used to reenergize and re-start a piece of downed equipment.

A. Replace guards / remove tools

B. Open any valves that were closed

C. Remove any blocking devices

D. Replace electrical fuses

E. Remove your lock or tag

F. Determine that the area is clear for startup

G. Reactivate energy sources and re-start the equipment

1.7 Shift Change Procedures

Exiting personnel shall meet oncoming personnel at the lockout/tagout device. The oncoming authorized employee should place his/her lock or tag on the energy isolating device before the exiting authorized employee removes his/her lock or tag. If this is not possible, the oncoming authorized employee should place his/her lock or tag on the energy isolating device immediately after the exiting authorized employee removes his/her lock or tag. Exiting employees should inform oncoming employees of any problems or concerns regarding the service and maintenance of machinery or equipment.

1.8 Contractor Requirements

Contractors must be informed and understand the Environmental Management lockout/tagout procedures, and the contractor's lockout/tagout procedures program must be compatible with the Environmental Management program.

1.9 Training Requirements

Training for the procedures of lockout/tagout shall be provided to the following classes of employees:

1.9.1 Authorized Employees shall be trained to:

A. Know how to recognize hazardous energy sources

B. Know how to identify sources within the workplace

C. Know how to isolate and control hazardous energy

1.9.2 Affected Employees shall be trained to:

A. Understand how and why lockout/tagout procedures are used

B. Comply with lockout/tagout procedures

1.9.3 Other Employees shall be trained to:

A. Understand why procedures are used but not how they are used

B. Never attempt to restart equipment that has been locked or tagged out

1.9.4 Retraining of any employee, Authorized, Affected, or other shall occur when:

A. There is a change in equipment

B. There is a change of energy control procedures

C. There is a change in job assignment

D. Periodic inspections show non-compliance

E. The employer determines the need to review procedures

F. A training certificate shall be issued, including the date and manner of training, documented by the training officer and placed in the employee's training file

1.10 Program Audits

A periodic audit or inspection to ensure proper procedures are being followed shall be performed and documented. An Authorized Employee who does not work with the equipment to be inspected shall perform a documented audit on at least an annual basis. Audits will address the following questions:

* Do the employees understand the program and how to properly lock or tag out equipment or machines?

* Are the proper locks and tags used?

* Are lockout/tagout procedures being utilized?

1.10.1 Equipment Specific Lockout/Tagout Procedures

There multiple locations at the Environmental Management facility where lockout/tagout is required. Specific lockout/tagout procedures have been developed for the following equipment and can be found in Appendix C through Appendix F.

A. Main entrance electric gate motor.

B. Hard-wired shop lathe

C. Mix room fans

D. Tanker entry or maintenance

E. Trash Compactor

The requirements for multiple locks or the potential of multiple employees working at these locations are not a factor.

All field projects performed for clients are conducted in accordance with that company's Lockout/Tagout program.

Appendix A
29 CFR 1910.147

Appendix B
Blank Lockout Control Form

Appendix C
Entry Gate Lockout Control Form

Appendix D
Lathe Lockout Control Form

Appendix E
Mix Room Fan(s) Lockout Control Form

Appendix F
Trash Compactor Lockout Control Form

Volume 5

MEDICAL FIRST AID PROGRAM

Environmental
MANAGEMENT

2013

1.1 Purpose

Environmental Management is dedicated to the protection of its employees from all on-the-job accidents, injuries, exposures and illnesses. Numerous programs have been established to insure that employees are provided a safe healthy work environment. However, when injuries or illnesses do occur, we are prepared to immediately respond to the needs of the injured or ill in a safe and expeditious manner. All employees are trained to respond and render assistance to a co-worker as a First Aid Provider. The first responder is readily available and trained to provide basic life sustaining actions such as CPR, foreign body airway obstruction, bleeding control, shock management, musculoskeletal stabilization, etc.

This Medical/First Aid Program is intended to ensure that Environmental Management meets or exceeds the requirements established in 29 CFR 1910. 151 & 152 Medical Services and First Aid and 29 CFR 1926.23, First Aid and Medical Attention and 29 CFR 1926.50, Medical Services and First Aid.

Medical services and first aid regulations can be found in Appendix A.

1.2 Administrative Duties

The Training Coordinator and/or the Health and Safety Officer is the designated First Aid Program Administrator and is responsible for establishing and implementing the written First Aid Program. This person has full authority to make necessary decisions to ensure the success of this program. Copies of the program may be obtained from a supervisor, the main office library, or the Health & Safety database. If after reading this program, you find that improvements can be made, please contact the Health and Safety Officer. We encourage all suggestions because Environmental Management is committed to the success of this written program.

1.3 First Aid Personnel

Mercy Hospital is readily available for advice and consultation on matters of workplace health that would exceed the medical capabilities of those individuals trained to the first responder level. Additional requirements are also mandated by 29 CFR 1910.120 (HAZWOPER) for exposure and medical monitoring programs that address those employees that work on a hazardous waste site or respond to releases of hazardous materials. Environmental Management is also required to meet the medical requirements of 29 CFR 1910.134 (The respiratory standard) and the Department of Transportation's 49 CFR 391.43 medical examination for drivers. All employees have been trained as First Aid Providers. The *National EMS Education and Practice Blueprint* lists the following first aid designations:

"First aid provider" Occupationally required to be trained in first aid even though they may not be specifically obligated by law to perform first aid. Responds as a "Good Samaritan." Uses a limited amount of equipment to perform initial assessment and provide immediate life support and care while awaiting arrival of emergency medical services (EMS).

"First responder" Uses a limited amount of equipment to perform initial assessment and intervention and is trained to assist other EMS.

"Emergency Medical Technician (EMT)-Basic" The 2nd level of professional emergency medical care provider. Qualified to function as the minimum staff for an ambulance.

"EMT-Intermediate" The 3rd level of professional emergency medical care provider. Can perform essential advanced techniques and administer a limited number of medications.

"Paramedic" The 4th level of professional emergency medical care provider. Can administer additional interventions and medications.

The following person(s) are trained to render first aid at Environmental Management:

Name/Title and first aid designation:	Department and telephone #:	Responsibilities:	Roles:
Spill Coordinators, Support Staff Field Technicians	Main Office, Shop, Field Operations	Basic First-Aid & CPR	First Aid Provider
Training Coordinator	Training	Basic First- Aid & CPR Training	First Aid Provider/Trainer

1.4 Hazard and Medical Services Assessment

The Health and Safety Officer performed a Job Hazard Assessment at Environmental Management to determine those work activities that pose a significant risk of a life-threatening or permanently disabling injury or illness.

It was determined that the following injuries, illnesses or exposures have the potential to occur in the listed locations:

Injury/Illness Type:	Injury/Illness:	Department Affected:
Slip, Trip, Fall	sprains, strains, cuts, abrasions, etc	Facility wide
Electrical Shock	burns, shock, cardiac arrest	Facility wide
Thermal Burns	1st, 2nd, 3rd, chemical, electrical, frostbite	Mixing room, docks, shop
Chemical Exposure	Inhalation, ingestion, injection, skin absorbent	Mixing room, docks, shop

The nearest medical facility is the Logan County Mercy Hospital. It is located approximately 6.5 miles west of the Environmental Management facility in Guthrie, Oklahoma. The medical facility is considered to be in close proximity due to the short travel time and distance. The Guthrie Fire and Rescue provides Advanced Life Support services (Paramedics) with a response time of approximately five minutes. All employees have been trained to activate the 911 system

to facilitate services. The HASP is utilized in the field to identify available services.

1.5 First Aid Supplies and Equipment

It is important that our first aid supplies and equipment meet the specific needs of our workplace. The Health and Safety Officer has ensured that adequate first aid supplies are readily available. Fully equipped first aid kits that meet the requirements established by ANSI Z308.1-1998 are located strategically throughout the facility and in all company vehicles. A comprehensive inventory is maintained for the restocking of kits. All spill coordinators shall inspect their kits each Monday morning to ensure kit is complete.

The complete inventory of First Aid Supplies for restocking can be found in Appendix B.

It is the responsibility of the Health and Safety Officer to inspect all first aid kits before being sent to job-sites and on a weekly basis while on-site to replace expended items. In addition, a monthly inventory of the main supply cabinet shall be performed to insure quantity and quality of first aid supplies. Supplies shall be replaced promptly when expended.

Various work activities require the handling of corrosive materials (Acids & Caustics), Environmental Management provides these drenching and flushing facilities, (eye washes & showers) that meet the specifications of ANSI Z358.1, *Emergency Eyewash and Shower Equipment*:

Installation:	**Location:**	**Rate of water delivery:**	**Water temperature:**
Eyewash & Shower	Mixing Room	0.4 gal/min for 15 minutes	60 to 105 degrees F
Eyewash & Shower	Shop	20 gal/min for 15 minutes	60 to 105 degrees F
Eyewash & Shower	Dock 1	20gal/min for 15 minutes	60 to 105 degrees F
Eyewash & Shower	Dock 2	20gal/min for15 minutes	60 to 105 degrees F
Portable Eyewash Station	Dock 3	2 One Liter Bottles	Ambient Temperature

Because it is reasonably anticipated that employees will be exposed to blood or other potentially infectious materials while rendering first aid, we provide the following personal protective equipment as "total body isolation protection":

*Safety glasses

* Face Shields

* Gloves

* Splash Suits

* Pocket Mask (CPR)

See our written Exposure Control Program for further details.

1.6 Training

Training is the heart of our First Aid Program. Employees should **NOT** attempt to rescue or treat an injured or ill employee unless they are qualified and can do so safely. Instead, they should contact someone who is qualified.

Employees who are qualified to render first aid have completed Environmental Management's first aid training program. The Training Officer is responsible for conducting training and possesses the qualifications necessary to design, develop, and deliver all programs related to this Medical/First Aid Program. The minimum instructor qualifications include: American Heart Association CPR Instructor Trainer.

First aid training is required at assignment and on a biennial basis or when workplace conditions change. The training consists of both cognitive lecture based presentations and successful completion of those psychomotor skills necessary to provide basic first aid treatment. The training ensures that employees are knowledgeable in Basic first aid procedures, Adult CPR, and Foreign Body Airway Obstruction.

A training materials overview can be found in Appendix C.

1.6.1 Training Certification

After an employee has completed the training program, the trainer will determine whether the employee can safely perform first aid. The Training Program Assistant is responsible for keeping records verifying certification of each employee who has successfully completed training. Each certificate will be issued in accordance with the American Red Cross and/or The American Heart Association. The certificate includes the name of the employee, the date(s) of the training, and the signature of the person who performed the training and evaluation.

1.6.2 Re-training

Trained employees are retrained every two years to keep their knowledge and skills current and to meet AHA or Red Cross guidelines.

1.7 First Aid Procedures

While it is important to provide immediate treatment to an ill or injured patient it is imperative that first responders not exceed their level of training. Only those treatments and techniques that have been discussed and practiced in training are to be utilized.

1.8 Accident/Injury/Exposure Reporting

All accidents, injuries, or exposures that require emergency medical assistance beyond the First Aid Providers capabilities and would require transport to a definitive care facility shall be accomplished by 911 notification or direct contact with the Guthrie Fire/Rescue. All field activities shall include emergency phone contact numbers on the Site Specific Health and Safety plan. The field supervisor is responsible to make appropriate notifications.

After the immediate needs of an injury or illness emergency have been met, we require our

employees to report the event to their supervisor. Extremely minor injuries, like a small bruise, do not need to be reported. However, those injuries and illnesses involving professional treatment, time away from work, or a near miss of a more serious accident, must be reported to an employee's supervisor. Even injuries that do not become apparent until after the cause must be reported. For example, back pain that develops over a period of time must be reported.

Reporting forms are located in Appendix D.

1.9 Recordkeeping

The Records Coordinator is responsible for maintaining the following records and documentation relating to first aid, injuries, illnesses, and accidents:

Record:	Brief description:	Location of record:
Accident/Injury	All accidents or injuries	Medical Records File

1.10 Program Evaluation

By having the Training Coordinator and/or Safety Officer thoroughly evaluate and, as necessary, revise our program, we ensure the program's continued effectiveness. Program evaluation is performed annually or as required. Program evaluation involves plan revisions pertaining to regulatory changes, new technology, or a change in working conditions.

Appendix A

Medical Services and First Aid Regulations

29 CFR 1926.50

Appendix B

First Aid Supply Inventory

Appendix C

Training Materials Overview

Appendix D

Reporting Forms

PERMIT REQUIRED CONFINED SPACE ENTRY PROGRAM

Environmental
MANAGEMENT

2016

1.1 Purpose

The purpose of the Environmental Management (EMI) Confined Space Entry Program is to inform employees of the procedures to be followed when entering any space determined to be a confined space as per OSHA's Confined Space Standard, 29 CFR 1910.146. Environmental Management has performed evaluations of the facility functions and determined that written procedures are required which address the evaluation and entry of confined spaces. This program shall apply to all work operations where employees must enter a permit-required confined space as part of their job duties. All suggestions or recommendations for improvements to the program are encouraged.

1.2 Company Policy

Environmental Management is committed to a safe and healthful workplace for its employees. The Confined Space Entry Program is designed to help identify all permit spaces at the workplace and ensure that all authorized employees will enter, work in, and exit the permit spaces safely. In order to provide a safe work environment to employees who work in and around permit spaces, EMI will do the following:

- Evaluate each confined space to determine if it has the characteristics of a permit space.
- Inform all employees of the location and the hazards in each permit space.
- Prevent unauthorized persons from entering a permit space.
- Train authorized entrants, attendants, and entry supervisors so that they have the skills necessary to fulfill their duties.
- Provide the necessary equipment for permit space work at no cost to the employee, maintain the equipment, and ensure employees know how to use the equipment properly.
- Inform contractors about the permit space program and coordinate entry operations.

Note: To inform all employees of the existence of confined spaces or permit spaces at the facility, all confined spaces shall be identified using appropriate signage.

1.3 Definitions

"Acceptable entry conditions" means conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit-required confined space entry can safely enter into and work within the space.

"Attendant" means an individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant's duties assigned in the employer's permit space program.

"Authorized entrant" means an employee who is authorized by the employer to enter a permit space.

"Blanking or blinding" means the absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line or duct with no leakage beyond the plate.

"Confined Space" means any space that meets the following criteria:
Is large enough and so configured that an employee can bodily enter and perform assigned work, has limited or restricted means for entry or exit, and
is not designed for continuous employee occupancy.

"Double block and bleed" means the closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.

"Emergency" means any occurrence (including failure of hazard control or monitoring equipment) or event internal or external to the permit space that could endanger entrants.

"Engulfment" means the surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system, or that can exert enough force on the body to cause death by strangulation, constriction or crushing.

"Entry" means the action by which a person passes through an opening into a permit-required confined space. Entry shall include the ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.

"Entry permit (permit)" means the written or printed document that is provided by the employer to allow and control the entry into a permit space and that contains the specified information.

"Entry supervisor" means the person responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section. (An entry supervisor may also serve as an attendant or as an authorized entrant, as long as that person is trained and equipped as required by this section for each role he/she fills. Also, the duties of entry supervisor may be passed from one individual to another during the course of any entry operation.)

"Hazardous Atmosphere" means an atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue, injury, or acute illness from one or more of the following causes:

* Flammable gas, vapor or mist in excess of 10% of its lower flammable limit (LFL)

* Airborne combustible dust at a concentration that meets or exceeds its LFL

* Atmospheric oxygen concentration below 19.5% or above 23.5%

* Atmospheric concentration of any substance for which a dose or permissible exposure limit is published and which could result in employee exposure in excess of its dose or permissible exposure limit. This does not include any substance that is not capable of causing death, incapacitation, impairment of the ability to self-rescue, injury or acute illness due to its health effects.

* Any other atmospheric condition that is immediately dangerous to life or health

Note: For air contaminants, for which OSHA has not determined a dose or permissible exposure limit, other sources of information such as Material Safety Data Sheets that comply with the Hazard Communication Standard, Section 1910.1200, published information, and internal documents can provide guidance in establishing atmospheric conditions.

"Hot work permit" means the employer's written authorization to perform operations (e.g. riveting, welding, cutting, burning or heating) capable of providing a source of ignition.

"Immediately Dangerous to Life and Health (IDLH)" means any condition that poses immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit space.

"Inerting" means the displacement of the atmosphere in a permit space by a non-combustible gas, such as nitrogen, to such an extent that the resulting atmosphere is noncombustible. This procedure produces an IDLH oxygen-deficient atmosphere.

"Isolation" means the process by which a permit space is removed from service and completely protected against the release of energy and material into the space by mechanical means.

"Line breaking" means the intentional opening of a pipe, line or duct that is or has been carrying flammable, corrosive, or toxic materials, an inert gas, or any fluid at a volume, pressure, or temperature capable of causing injury.

"Non-permit required space" means a confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

"Oxygen deficient atmosphere" means atmospheres containing less than 19.5% oxygen by volume.

"Oxygen enriched atmosphere" means atmospheres containing more than 23.5% oxygen by volume.

"Permit required confined space (permit space)" means a confined space that has one or more of the following characteristics:

* Contains or has the potential to contain a hazardous atmosphere

* Contains a material that has the potential for engulfing and entrant

* Has an internal configuration such that an entrant could be trapped, asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or

* Contains any other recognized serious safety or health hazard

"Permit required confined space program (permit space program)" means the employer's overall program for controlling and, where appropriate, protecting employees from permit space hazards and for regulating employee entry into permit spaces.

"Permit system" means the employer's written procedure for preparing and issuing permits for entry and for returning the permit space to service following the termination of entry.

"Prohibited condition" means any condition in a permit space that is not allowed by the permit during the period when entry is authorized.

"Rescue service" means personnel designated to rescue employees from permit spaces.

"Retrieval system" means the equipment (including a retrieval line, chest or full body harness, wristlets (if appropriate), and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.

"Testing" means the process by which the hazards that may confront entrants of a permit space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

1.4 Program Responsibilities

The Health and Safety Officer in conjunction with the Training Officer shall have the overall responsibility for the development and implementation of the Confined Space Program and any confined space rescue services. Management, entry supervisors,

attendants, authorized entrants, and rescue personnel have the following duties and responsibilities:

1.4.1 Management

The Health and Safety Officer and designated supervisors shall be assigned the following responsibilities:

A. Ensure proper training for entry and rescue teams

B. Provide proper equipment for entry and rescue teams

C. Ensure confined space assessments have been conducted

D. Ensure all permit required confined spaces at their facility be posted

E. Annually review this program and all entry permits. Retain permits for one (1) year to assist in revisions and improvements of the program.

F. Evaluate Rescue Teams/Service to ensure they are adequately trained and prepared

G. Ensure rescue team has access during entry into spaces with IDLH atmospheres

1.4.2 Employees

Employees shall be assigned the following responsibilities:

A. Follow program requirements

B. Report any previously unidentified hazards associated with confined areas

1.4.3 Entry Supervisor

Entry supervisors are responsible for the overall permit space entry and must coordinate all entry procedures, tests, permits, equipment and other relevant activities. The following entry supervisor duties are required:

A. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.

B. Verify, by checking that the appropriate entries have been made on the permit, all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin.

C. Terminate the entry and cancel the permit when the entry is complete or if a prohibited condition arises.

D. Verify that rescue services are available and that there is an effective means for summoning them.

E. Remove unauthorized persons who enter or attempt to enter the space during entry operations.

F. Determine whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space that entry operations remain consistent with the permit terms and that acceptable entry conditions are maintained.

1.4.4 Attendant(s)

At least one attendant is required outside the permit space into which an entry is authorized for the duration of the entry operation. The responsibilities of the entry attendant include:

A. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms and consequences of the exposure.

B. Be aware of possible behavioral effects of hazard exposure on entrants.

C. Continuously maintain an accurate count of entrants in the permit space and ensure a means to accurately identify those entrants.

D. Remain outside the permit space during any operations until relieved by another attendant.

E. Communicate with entrants as necessary to monitor entrant status and alert entrants of the need to evacuate.

F. Monitor activities inside and outside the space to determine if it is safe for entrants to remain in the space and orders the entrants to immediately evacuate if:

(1) The attendant detects a prohibited condition

(2) Detects entrant behavioral effects of hazard exposure

(3) Detects a situation outside the space that could endanger the entrants

(4) The attendant cannot effectively and safely perform all the attendant duties

G. Summon rescue and other emergency services as soon as the attendant determines the entrants need assistance to escape the permit space hazards

H. Perform non-entry rescues as specified by the rescue procedure and entry supervisor

I. DO NOT perform any duties that may interfere with the attendant's primary duty to monitor and protect entrants

J. Take the following action when unauthorized persons approach or enter a permit space while entry is underway:

(1) Warn the unauthorized person that they must stay away from the permit space

(2) Advise unauthorized persons that they must exit immediately if they have entered the space, and

(3) Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space

K. Authorized Attendants shall monitor only one (1) permit space. Multiple permit space monitoring by a singe attendant is prohibited.

1.4.5 Entrants

All entrants must be authorized by the entry supervisor in order to enter permit spaces, have received the required training, use the proper equipment, and observe the entry procedures and permit. The following entrant duties are required:

A. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure

B. Properly use the equipment required for safe entry

C. Communicate with the attendant as necessary to enable the attendant to monitor the status of the entrants and enable the attendant to alert the entrants of the need to evacuate the space if necessary

D. Alert the attendant whenever; the entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or any prohibited condition is detected, and

E. Exit the permit space as quickly as possible whenever the attendant or entry supervisor gives an order to evacuate the permit space, the entrant recognizes any warning signs or symptoms of exposure to a dangerous situation, the entrant detects a prohibited condition, or an evacuation alarm is activated

1.4.6 Rescue and Emergency Services

A. An employer who designates rescue and emergency services shall evaluate a prospective rescuer's ability to respond to a rescue summons in a timely manner considering the hazards identified.

Note: Timely response will vary according to the specific hazards involved in each entry. For example, 1910.134 (Respiratory Protection), requires that employers provide a standby person(s) capable of immediate action to rescue employee(s) wearing respiratory protection while in work areas defined as IDLH atmospheres.

B. Evaluate a prospective rescue service's ability, in terms of proficiency with rescue related tasks and equipment, to function appropriately while rescuing entrants from the particular permit space or types of permit spaces identified.

C. Select a rescue team or service from those evaluated that has the capability to reach the victim(s) within a time frame that is appropriate for the permit space hazard(s) identified and is equipped for, and proficient in, performing the needed rescue services.

D. Inform each rescue team or service of the hazards they may confront when called on to perform rescue at the site.

E. Provide the rescue team or service selected with access to all permit spaces from which rescue may be necessary so that the rescue service can develop appropriate rescue plans and practice rescue operations. An employer whose employees have been designated to provide permit space rescue and emergency services shall take the following measures:

(1) Provide affected employees with the personal protective equipment (PPE) needed to conduct permit space rescues safely and train affected employees so they are proficient in the use of that PPE, at no cost to the employees.

(2) Train affected employees to perform assigned rescue duties. The employer must ensure that such employees successfully complete the training required to establish proficiency as an authorized entrant.

(3) Train affected employees in basic first aid and cardiopulmonary resuscitation (CPR). The employer shall ensure that at least one member of the rescue team or service holding a current certification in first aid and CPR is available.

(4) Ensure that affected employees practice making permit space rescues at least once every 12 months, by means of a simulated rescue operation in which they remove dummies, manikins, or actual persons from the actual permit space or from representative permit spaces.

(5) To facilitate non-entry rescue, retrieval systems or methods shall be used whenever an authorized entrant enters a permit space, unless the retrieval equipment would increase the overall risk of entry or would not contribute to the rescue of the entrant.

F. Each authorized entrant shall use a full chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, above the entrants head, or at another point which the employer can establish presents a profile small enough for the successful removal of the entrant. Wristlets may be used in lieu of the chest or full body harness if the employer can demonstrate that the use of a chest or full body harness is infeasible or creates a greater hazard and that the use of the wristlets is the safest and most effective alternative.

G. The other end of the retrieval line shall be attached to a mechanical device or fixed point outside the permit space in such a manner that rescue can begin as soon as the rescuer becomes aware that the rescue is necessary. A mechanical device shall be available to retrieve personnel from vertical type permit spaces more than 5 feet (1.52 m) in depth.

H. If an injured entrant is exposed to a substance for which a Material Safety Data Sheet (MSDS) or other similar written information is required to be kept at the work-site, that MSDS or written information shall be made available to the medical facility treating the exposed entrant.

Note: All the information outlined in the previous paragraphs regarding rescue services is for the benefit of Environmental Management's customers. All Permit Required Confined Space entries performed at the Environmental Management facility or for clients shall incorporate an on-site rescue team consisting of trained Environmental Management employees. All on-site personnel are trained in rescue, entry, CPR/First Aid, victim extrication, etc. Company policy states that all entries shall include an on-site rescue team.

1.5 Confined Space and Permit Space Identification

The Health and Safety Officer has identified and evaluated all enclosures that have the characteristics of confined spaces and permit required spaces as shown below.

Description	Location	Type of Space (check one)			
Drum Crusher	Terminal Yard	Confined Space		Permit Space	X
Fly Ash Tank	Building #3 - Outside	Confined Space		Permit Space	X
Maintenance Pit	Building #2 - Inside	Confined Space	X	Permit Space	
P-25 (1000 gal)	Terminal Yard	Confined Space		Permit Space	X
Roll Off Boxes	Terminal Yard	Confined Space	X	Permit Space	
Tank #3	Non-Haz Dock	Confined Space		Permit Space	X
Tank #4	Non-Haz Dock	Confined Space		Permit Space	X
Tank #7	Non-Haz Dock	Confined Space		Permit Space	X
TT-7	Terminal Yard	Confined Space		Permit Space	X
TT-11	Terminal Yard	Confined Space		Permit Space	X
TT-22	Terminal Yard	Confined Space		Permit Space	X
Trash Compacter	Building #3 - Outside	Confined Space		Permit Space	X
Vacuum Boxes	Terminal Yard	Confined Space	X	Permit Space	
		Confined Space		Permit Space	

1.6 Permit Required Confined Space Entry General Rules

1.6.1 During all confined space entries, the following safety rules must be strictly enforced:

A. Only authorized and trained employees may enter a confined space or act as safety attendant.

B. No smoking shall be permitted in a confined space or near an entrance/exit area.

C. During confined space entries, the attendant must be present at all times.

D. Constant visual or voice communication will be maintained between the attendant and the employees entering a confined space.

E. No bottom or side entry will be made or work conducted below any hanging material or material which could cause engulfment.

F. Air and oxygen monitoring is required before entering any permit required confined space. Oxygen levels in a confined space must be between 19.5

and 23.5 %. Levels below 19.5% will require the use of SCBA or an airline approved air supplied respirator. Levels above 23.5% will require purging and/or ventilation. The monitoring will check oxygen levels, explosive gas levels, and carbon monoxide levels.

G. To prevent injuries to others, a barricade will protect all openings to confined spaces when covers are removed.

1.7 Confined Space Entry Procedures

If the confined space has atmospheric and non-atmospheric hazards that can not be eliminated, employees must follow these procedures.

1.7.1 Contract Workers

If contract workers will enter any permit required confined space on EMI property, then the Health and Safety Officer or Terminal Supervisor will be responsible for informing the contractor about all the hazards associated with the space, the company permit-space program, and any applicable EMI safety rules. The Health and Safety Officer or Terminal Supervisor will further review and discuss each contracted job with the contractor before work begins and determine if the contractor's own permit-space program is sufficient for entry. If the contractor's program is deemed to be less effective than the EMI permit required confined space program, then the contractor will follow the company's permit-space program.

1.7.2 Company Employees

Each employee who enters, or is involved in the entry of a confined space must understand the company's procedures for confined space entry, know the hazards of the specific space, review the procedures for each entrant, and understand how to use entry and rescue equipment. The following procedures should be utilized to perform permit space entry:

1.7.3 Pre-entry Procedure

A. Obtain a confined space entry permit

B. Evaluate the permit space and determine all hazards associated with the entry (chemical and physical).

C. Determine the proper personal protective equipment (PPE) to be used during the entry.

D. Isolate the permit space from all sources of hazardous energy. Ensure that the space is properly locked and tagged out. Install barriers around the permit space opening to protect entrants from external hazards.

E. Monitor the atmosphere with portable direct reading instrumentation for adequate oxygen, flammability and toxicity in that order, and at all depths. Continuous monitoring is highly recommended.

Note: Employees or their representatives are entitled to request additional air monitoring at any time when continuous monitoring is not performed.

F. Purge, inert, flush, or ventilate the confined space to eliminate or control atmospheric hazards. Ventilation should be continuous or until atmosphere is determined to be safe by air monitoring.

G. If the space atmosphere is not adequate for APR respirators, an SCBA or air line respirator shall be provided to all entrants and the attendant.

H. Ensure that entrants have the equipment needed to perform their assigned task(s) and that they know how to use the equipment.

I. Post a warning at the entrance to the space that says: WARNING, PERMIT-REQUIRED CONFINED SPACE. ENTRY BY PERMIT ONLY.

J. Discuss all aspects of the permit and entry with the entrants.

K. Verify that conditions in the space are safe for the duration of entry by having the Entry Supervisor certify by signature that all components of the permit are accurate and being followed.

L. Post the completed entry permit at the entrance of the confined space

1.7.4 Entry Procedure

A. Perform entry into the permit space.

B. Maintain continuous monitoring for oxygen levels, LEL, and toxic contaminants.

C. All electrical equipment in the space must be properly grounded.

D. The space must have adequate illumination.

E. All unauthorized persons must be kept away from the space.

F. Welding and burning equipment other than torches and hoses must not be taken into the space. Gas cylinders and welding machines must remain outside the space and must be blocked if they are on wheels.

G. The attendant must know how to shut off welding and burning equipment when entrants perform hot work.

H. If entrants need a ladder to enter a permit space, the ladder must be secured and must not move removed when they are in the space.

I. Entrants must leave the permit-space immediately if any of the following conditions occur:

(1) An order to evacuate is given by the attendant or entry supervisor.

(2) An entrant recognizes any warning sign or symptom of exposure.

(3) An evacuation alarm is sounded.

(4) An entrant is unable to communicate with the attendant.

Note: All permits and plans must be compatible to ensure worker safety.

M. Upon completion of the job, the Entry Supervisor shall cancel the permit.

(1) The space shall be locked or sealed.

(2) The barriers are removed.

(3) The person issuing the permit cancels the permit.

1.9 Rescue and Emergency Services

1.9.1 Non-Entry Rescue

Non-entry rescue is the preferred method for rescuing an entrant from a permit space. A retrieval system must be available to retrieve entrants from vertical permit spaces that are more than five feet deep. The retrieval system must be used to rescue an entrant unless the equipment would increase the risk of injury. Each authorized entrant must use a properly attached chest harness or full-body harness. Entrants may use wristlets if a chest or full-body puts them at grater risk of injury in an emergency. The other end of the retrieval line must be attached to a retrieval system outside the permit space so that rescue can begin immediately.

1.9.2 On-Site Rescue and Emergency Services

Employees will not enter a permit space to respond to an emergency unless they have been properly trained and equipped. If a permit space rescue is necessary, the attendant is responsible for doing the following:

- Summoning emergency responders
- Attempting to rescue entrants using only non-entry rescue techniques and equipment
- Monitoring the emergency and informing responders about the number of victims, their condition, and the hazards in the space

Only properly trained and equipped employees are permitted to enter a permit space during an emergency. Each employee who will enter a permit space in an emergency must do the following:

- Complete training required to establish proficiency as an authorized entrant
- Complete training in basic first aid and CPR
- Complete training in the use of personal protective and rescue equipment
- Use appropriate personal protective and rescue equipment
- Perform assigned rescue duties during a permit space emergency
- Practice a permit space rescue at least once every 12 months

1.9.3 Off-Site Rescue and Emergency Services

Environmental Management will utilize its own employees for on-site rescue services whenever possible. In the event an outside off-site rescue service is needed, Environmental Management will evaluate the responder's ability to perform rescue using the criteria listed in section 1.8.2. Environmental Management will also inform the off-site rescue service provider of hazards that may exist in the permit spaces identified

1.6 Confined Space Entry and Rescue Equipment

1.6.1 Environmental Management shall provide specialized equipment designed for confined space entry to affected employees. The following is a list of available confined space entry equipment:

A. Air Line System

B. Escape Packs (Scott)

C. Fall Protection Harnesses

D. Full Face Respirators (Scott AV-2000)

E. Intrinsically Safe Lighting

F. Multi Gas Meters (Rae Meters)

G. Needed Personal Protective Equipment (PPE)

H. Tag Lines

I. Tripods

J. Ventilation Fans

1.6.2 Environmental Management shall provide specialized equipment designed for confined space rescue to the designated rescue team. The following is a list of available confined space rescue equipment:

A. Anchor Devices/Straps

B. Automated External Defibrillators (AED)

C. Back Boards

D. C-Collars

E. Carabineers

F. Class III Rescue Harness

G. Edge Protection

H. Helmets

I. Leather Gloves

J. Lowering Devices (Bar Racks or Eights)

K. LSP Half Back/KED

L. Medical Kits

M. Oxygen Kits

N. Prusiks Cords

O. Pulleys

P. Rescue Rope (1/2 inch)

Q. SKED

R. Splints

S. Stokes Baskets

T. Webbing

1.10 Training

Each employee whose job functions require the possibility of entry into a confined space area shall be provided with specific training concerning the aspects of entering a confined space and permit required confined space area. All technical, operations and maintenance employees shall receive confined space entry training. New hire employees shall receive the training before being assigned any duty requiring entry into a confined space. All training shall be conducted utilizing classroom, audio-visual and hands-on participation.

Upon successful completion of the training program, each participant will be authorized by Environmental Management to enter a confined space or participate as a team member entering a confined space. In addition, all employees having received training shall perform, on an annual basis, a confined space entry rescue and confined space refresher training. After successful completion of training all employees receive a certificate of training verifying attendance and competency. The date of training and trainers name is identified on certificate. Employee certification documents are available in the employees training file.

If it is determined that an employee has deviated from Environmental Management procedure or that their knowledge of confined space entry is inadequate, that employee shall be relieved from working in a confined space until he/she has received additional training.

All changes in the Environmental Management Confined Space Program shall be addressed either through a company memorandum, refresher training courses, or both.

1.11 Program Evaluation and Review

To ensure that all employees participating in entry operations are protected from permit space hazards, Environmental Management shall perform an annual review of all canceled permits. The review must be completed sooner if there is reason to believe that the program does not adequately protect employees or is found to have deficiencies. Actions to correct deficiencies must be documented and affected employees must be

retrained. If no entry is performed during a twelve-month period, no review will be performed.

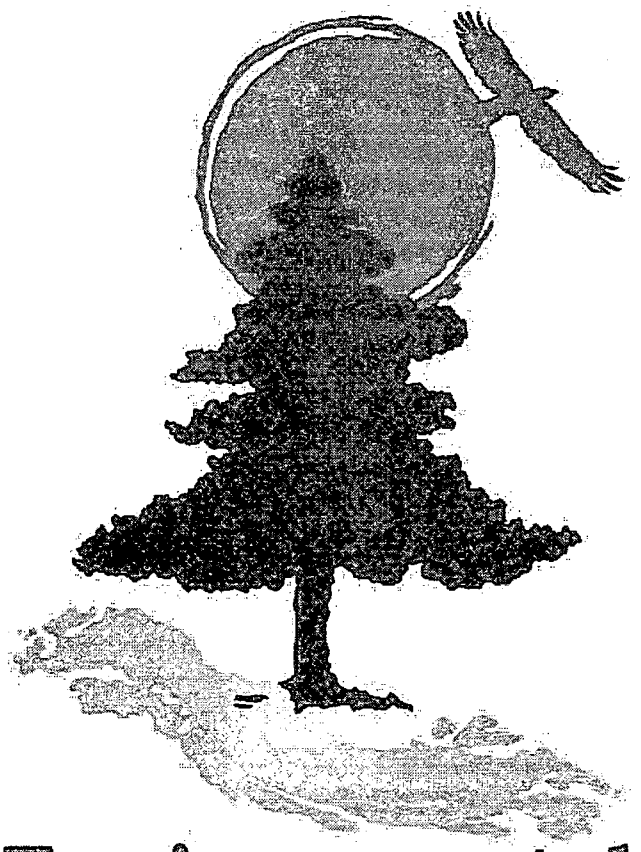
1.12 Enforcement

Constant awareness of compliance with all safety rules is considered a condition of employment. Supervisors and other members of management reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.

Appendix A
29 CFR 1910.146

Appendix B
Confined Space Entry Permit

PERSONAL PROTECTIVE EQUIPMENT



Environmental
MANAGEMENT

2011

INTRODUCTION

While OSHA's Personal Protective Equipment regulation, found at 29 CFR 1910.132-140 (Subpart I), does not explicitly require a written Personal Protective Equipment (PPE) Program, Environmental Management has developed a written PPE program to document and specify all information relative to our PPE needs.

The Health and Safety Officer is the program coordinator, and has overall responsibility for the program. The Health and Safety Officer will designate appropriate supervisors to assist in training employees and monitoring their use of PPE. This written plan is kept in the Health and Safety database and is available to all employees. The program is reviewed and updated as necessary. Copies of this program may be obtained from the Health and Safety Officer. Due to the vast scope and specific requirements of respiratory protection and hearing conservation, separate documentation addresses these issues in different sections of the Health and Safety Plan. (See chapters 3.2 and 4.7)

It is the intent of Environmental Management to provide a hazard free environment to all employees. Any employee encountering hazardous conditions must be protected against the potential hazards. When feasible, engineering controls and/or administrative controls shall always be utilized before personal protective equipment is selected. The purpose of protective clothing and equipment is to shield or isolate individuals from chemical, physical, biological, or other hazards that may be present in the workplace.

All PPE shall be provided at no cost to employees as required. The limited exceptions to this policy will be addressed on an individual basis with those affected employees. Employee owned equipment or supplies must be approved when determined to be adequate for the task being performed. Approved items will be covered under this program in regard to maintenance and cleaning by Environmental Management.

Establishing an overall written PPE program detailing how employees use PPE allows for monitoring and assurance that PPE is being properly used in the workplace. Additionally, the program documents our PPE efforts in the event of an OSHA inspection. The following elements are addressed in this program.

- Purpose
- Hazard assessment
- PPE selection
- Employee training
- Cleaning and maintenance of PPE
- PPE specific information

If after reading this program, you find that improvements can be made, please contact the Safety and Health Officer. Employee suggestions are encouraged and will improve the process. The success or failure of the program is directly dependent upon the total commitment and participation of those affected employees. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

1.1 Purpose of Program

The basic element of any PPE program is an in depth evaluation of the equipment needed to protect against the hazards in the workplace. This is the initial hazard assessment for which written documentation is required. Two basic objectives of any PPE program should be to protect the wearer from incorrect use and/or malfunction of PPE. The purpose of this Personal Protective Equipment (PPE) Program is to document the hazard assessment, protective measures currently being utilized, and to identify what PPE is currently required. PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound industry practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards that cannot reasonably be abated otherwise.

1.2 Hazard Assessment

In order to assess the need for PPE the following steps are taken:

1.2.1 The Safety and Health Officer in conjunction with other pertinent managers, supervisors and employees, shall identify job classifications where exposures occur or could occur. The Health and Safety Officer or his/her designee examines the following records and/or uses the following forms to identify and rank jobs according to exposure hazards:

A. Injury/illness records

Previous accidents, injuries or illnesses must be identified and analyzed to determine if the event was due to non-use, improper use or PPE failure. PPE selection, use and training programs can be initiated based on those findings.

B. First aid logs

First aid logs can depict a pattern of accidents and injuries that could be avoided through the use of appropriate PPE or a change of PPE.

C. Hazard Assessment Form

Hazard Assessment Forms identify the PPE needed for specific tasks by determining the hazards for target areas of the body. Various job tasks have already been evaluated and a detailed hazard assessment form for those tasks can be found in Appendix C - H.

1.2.2 The Safety Manager conducts a walk through survey of workplace areas where hazards exist or may exist to identify sources of hazards to employees. They consider these basic hazard categories:

A. Impact

B. Heat /Cold

C. Penetration

D. Harmful dust

E. Light radiation

F. Compression (roll over)

G. Chemical

During the walk through survey the Safety and Health Officer observes and records the following hazards along with PPE currently in use.

H. Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects:

(1) Cutting, grinding, shaping tools

(2) Motorized vehicles (autos, trucks, forklifts, bobcats)

(3) Turning blades, augers, mixers, blades, chains, belts, etc.

I. Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.

(1) Open flames

(2) Welding, cutting, grinding, sanding,

(3) Chemical reactions

(4) Electrical

(5) Extreme air temperature

J. Sources of cold that could result in burns, eye or skin injury or PPE destruction, etc.

(1) Cryogenics

(2) Refrigerated liquids

(3) Extreme air temperature

K. Types and hazards of chemical exposures.

(1) Explosives

(2) Flammable gases

(3) Toxic/poison/inhalation gases

(4) Flammable liquids

(5) Flammable solids

(6) Oxidizers

(7) Toxic/poison liquids or solids

(8) Radioactive materials

(9) Corrosive materials (acids or caustics)

L. Sources of harmful dust or airborne particulates.

(1) Fly-ash

(2) Iron Oxide (rust)

(3) Asbestos

(4) Common dust

M. Sources of light radiation

(1) Arc welding

(2) Gas cutting or brazing

(3) Wire-feed welding

(4) Laser

(5) Sunlight

N. Sources of falling objects or potential for dropping objects:

(1) Trenching and excavations

(2) Backhoe or other heavy equipment working overhead

(3) High shelving or racked storage

(4) All work performed at heights 5' or more above grade

O. Sources of sharp objects that might pierce the feet or cut the hands:

(1) Deheading drums, container lid removal,

(2) Damaged containers (metal, wood, plastic)

(3) Needles and sharps

(4) Chemical containers (glass, metal, plastic)

P. Sources of rolling or pinching objects that could crush the feet:

(1) Heavy equipment

(2) Drums

(3) Roll-off containers and roll-off trucks

(4) Punch press

(5) Miscellaneous small hand tools

1.2.3 Following the walk through survey, the Health and Safety Officer organizes the data and information for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment.

1.2.4 An estimate of the potential for injuries is now made. Each of the basic hazards is reviewed and a determination made as to the frequency, type, level of risk, and seriousness of potential injury from each of the hazards found. The existence of any situations where multiple exposures occur or could occur is considered.

1.2.5 The Health and Safety Officer documents the hazard assessment via a written certification that identifies the workplace evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and that the document is a certification of hazard assessment.

1.3 Selection Guidelines

1.3.1 Once any hazards have been identified and evaluated through hazard assessment, the general procedure for selecting protective equipment is to:

A. Become familiar with the potential hazards and the type of personal protective equipment (PPE) that is available, and what they can do.

B. Compare types of equipment to the hazards associated with the environment.

C. Select the PPE that ensures a level of protection greater than the minimum required to protect employees from the hazards.

D. Fit the user with proper, comfortable, well fitting protection and instruct employees on care and use of the PPE. It is very important that the users are aware of all warning labels and limitations of their PPE. (See the Employee Training guidelines outlined in the next section of this program for a more detailed description of training procedures.)

1.3.2 It is the responsibility of the Health and Safety Officer to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records, and re-evaluate the suitability of previously selected PPE. This reassessment will take place as needed, but at least annually. Elements that should be considered in the reassessment include:

A. Adequacy of PPE program

B. Accidents and illness experienced

C. Levels of exposure based on adequate air monitoring or exposure determination

D. Adequacy of equipment selection

E. Number of person hours that workers wear various protective ensembles

F. Adequacy of training/fitting of PPE

G. Program costs

H. The adequacy of program records

I. Recommendation for program improvement and modification

J. Coordination with overall safety and health program

1.4 Employee Training

1.4.1 The Training Division provides education for each employee who is required to use personal protective equipment. Training topics include the following:

A. When PPE is necessary

B. What PPE is necessary

C. How to wear assigned PPE

D. Limitations of PPE

E. The proper care, maintenance, useful life, and disposal of assigned PPE

Employees must demonstrate an understanding of the training and the ability to use the PPE properly before they are allowed to perform work requiring the use of the equipment.

Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work.

If the Health and Safety Officer has reason to believe an employee does not have the understanding or skill required; the employer must retrain that employee until they do. Since an employee's supervisor is in the best position to observe any problems with PPE use by individual employees, the Health and Safety Officer will seek this person's input when making the determination. Circumstances where retraining may be required include changes in the workplace or changes in the types of PPE to be used, which would render previous training obsolete. Also, inadequacies in an affected employee's knowledge or use of the assigned PPE, which indicates that the employee has not retained the necessary understanding or skills, would require retraining.

The Health and Safety Officer certifies in writing that the employee has received and understands the PPE training.

1.4.2 Because failure to comply with company policy concerning PPE can result in OSHA citations and fines as well as employee injury, an employee who does not comply with this program will be disciplined for noncompliance according to the following schedule:

A. Verbal warning for the first offense accompanied by retraining

B. Written reprimand for the second offense that goes in the employee's permanent record

C. Suspension without pay for a third offense and documentation in the permanent record

D. Dismissal as a last resort

1.5 Cleaning and Maintenance

It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned, and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees. If PPE is for general use, the Safety Manager has responsibility for cleaning and maintenance. If a piece of PPE is in need of repair or replacement it is the responsibility of the employee to bring it to the immediate attention of his or her supervisor or the Safety Manager. It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE that cannot be decontaminated is disposed of in a manner that protects employees from exposure to chemical hazards.

1.6 PPE Specific Information

The appropriate level of protection should be determined prior to entering a hazardous environment. All team members and employees shall be trained in the proper use and method of wearing protective equipment and gear. In all situations where the type of material is unknown, the maximum protection available will be utilized. The Levels of Protection are as follows:

1.6.1 Level A protection shall be selected when the greatest level of skin, respiratory, and eye protection is required. The fundamental requirements of Level A shall include:

A. Positive pressure, full face, self-contained breathing apparatus (SCBA), or positive pressure supplied air respirator with an escape SCBA, approved by the National Institute for Occupational Safety and Health (NIOSH)

B. Totally encapsulating chemical protective suit

C. Coveralls*

D. Gloves, outer, chemical resistant

E. Gloves, inner, chemical resistant

F. Boots, chemical resistant, steel toe and shank

G. Hard Hat (under suit)*

H. Disposable protective suit, gloves and boots (depending on the suit construction, may be worn over the totally-encapsulating suit).

1.6.2 In particular, Level A protection shall be used when:

A. The hazardous substance has been identified and required the highest level of protection for skin, eyes, and the respiratory system based on either the measured (or potential for) high concentration of atmospheric vapors, gases, or particulates; or the site operations and work functions involve a high potential for splash, immersion, or exposure to unexpected vapors, gases, or particulates of materials that are harmful to skin or capable of being absorbed through the skin

B. Substances with a high degree of hazard to the skin are known or suspected to be present and skin contact is possible

C. Operations are being conducted in confined, poorly ventilated areas and the absence of conditions requiring Level A have not been determined or eliminated

* Optional as applicable

1.6.3 Level B protection shall be selected when the highest level of respiratory protection is necessary but a lesser level of skin protection is required. The fundamental requirements of Level B shall be as follows:

A. Positive pressure, full face, self-contained breathing apparatus (SCBA), or positive pressure supplied air respirator with escape SCBA (NIOSH approved).

B. Hooded chemical-resistant clothing (overalls, long-sleeved jacked, coveralls; one or two piece chemical splash suit; disposable chemical-resistant overalls).

C. Coveralls*

D. Gloves, outer, chemical resistant

E. Gloves, inner, chemical resistant

F. Boots, outer, chemical-resistant, steel toe and shank

G. Boot Covers, outer, chemical-resistant (disposable)*

H. Hard hat*

I. Face shield*

1.6.4 Level B protection should be utilized when:

A. The type and atmospheric concentration of substances have been identified and require a high level of respiratory protection, but less skin protection than required in Level A

B. The atmosphere contains less than 19.5% oxygen

C. The presence of incompletely identified vapors or gases is indicated by a direct reading organic vapor detection instrument, but vapors and gases are not suspected of containing high levels of chemicals harmful to the skin or capable of being absorbed through the skin.

NOTE: This could involve atmospheres with IDLH concentrations of specific substances that present severe inhalation hazards and that do not represent a severe skin hazard; or that do not meet the criteria for use of air-purifying respirators.

* Optional as applicable

1.6.5 Level C protection shall be selected when the concentration(s) and types(s) of airborne substances is known and the criteria for use of an air-purifying respirator are met. The following equipment shall be fundamental for Level C:

A. Full face or half mask, air-purifying respirators (NIOSH) approved

B. Hooded chemical-resistant clothing (overalls; two-piece chemical splash suit; disposable chemical-resistant overalls)

C. Coveralls*

D. Gloves, outer, chemical-resistant

E. Gloves, inner, chemical resistant

F. Boots, outer, chemical-resistant, steel toe and shank

G. Boot covers, outer, chemical resistant (disposable)*

H. Hard hat*

I. Escape mask*

J. Face shield*

1.6.6 Specifically, Level C protection should be utilized when:

A. The atmospheric contaminants, liquid splashes, or other direct contact will not adversely affect or be absorbed through any exposed skin

B. The types of air contaminants have been identified, concentrations measured, and an air purifying respirator is available that can remove the contaminants

C. All criteria for the use of air-purifying respirators are met (i.e. oxygen levels, etc.)

* Optional as applicable

1.6.7 Level D consists of a work uniform affording minimal protection, used for nuisance contamination only. The following equipment shall constitute fundamental equipment for Level D:

A. Coveralls

B. Gloves*

C. Boots/shoes, chemical resistant, steel toe and shank

D. Boots, outer, chemical resistant (disposable)*

E. Safety glasses or chemical splash goggles

F. Hard hat*

G. Escape mask*

H. Face shield*

1.6.7 Level D protection should be used when:

A. The atmosphere contains no known hazards

B. Work functions preclude splashes, immersion, or the potential for unexpected inhalation of or contact with hazardous levels of any chemicals

1.6.8 Selection Guidelines

Only once any hazards have been identified and evaluated through hazard assessment, and the proper PPE has been selected and is in use should any employee enter a hazardous environment. The general, the procedures for selecting protective equipment is as follows:

A. Become familiar with the potential hazards and the type of protective equipment that is available, and what it can do; i.e., splash protection, impact protection, etc.

B. Compare the hazards associated with the environment, i.e. impact velocities, masses, projectile shape, radiation intensities, etc., with the capabilities of the available protective equipment.

C. Select the protective equipment that ensures a level of protection greater than the minimum required to protect employees from the hazards.

D. Fit the user with the protective device and give instructions on care and use of the PPE. It is very important that end users be made aware of all warning labels for and limitations of their PPE.

1.6.9 Eye and Face Protection – Safety Glasses, Goggles and Face Shields

It is the policy of the company that as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved safety glasses, goggles/face shields to help prevent eye and face injuries, including those resulting from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or light radiation, for example. Employees in the following designated work areas are required to wear the appropriate eye and face protection.

A. Maintenance Shop:

(1) All employees shall wear safety glasses when in marked work areas.

(2) Goggles shall be utilized when sprays or splashing is suspected

(3) All welding and cutting operations require appropriate eye and face protection; e.g., goggles, welding hoods, shields, etc.

B. Non-Hazardous Dock, Hazardous Dock, Mixing Room, Field Operations

(1) Appropriate eye and/or face protection is required on dock on any areas north of maintenance shop. These areas are identified with "Authorized Employees Only" signage.

Note: All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

C. All employees who work in designated work areas and/or job assignments are responsible for wearing company provided safety glasses, goggles/face shields to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge. All employees required to wear safety glasses,

goggles/face shields must routinely inspect and properly care for their equipment.

1.6.10 Foot Protection - Safety Shoes

It is the policy of the company that as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear safety shoes to help prevent foot injuries, ankle injuries, slips, and falls.

Employees in the following designated work areas are required to wear ANSI-approved safety shoes or safety shoes that have been demonstrated to be equally effective:

All work activities at the Environmental Management facility require at a minimum: 6" leather laced boots with a steel toe and steel shank. During any activity that involves the potential for chemical exposure employees are required to wear the issued rubber chemical protective boot. Field activities require the same level of observance. The job activities will dictate the level of protection required

All supervisors and managers are responsible for ensuring employees are in compliance with this policy.

Those employees who work in non-designated areas of the facility and vendors and visitors will be allowed to walk through the designated work areas without safety shoes as long as they remain in outlined aisles or walkways.

All employees who work in designated work areas and/or job assignments are responsible for purchasing and wearing safety shoes to comply with this policy. Environmental Management will provide reimbursement to all qualified employees in an amount not to exceed $75.00 to purchase leather boots. Chemical protective boots shall be provided at no cost to the employee. Failure to comply will result in disciplinary action up to and including discharge.

1.6.11 Hand Protection - Gloves

It is the policy of Environmental Management that as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear gloves to help prevent hand injuries, including abrasions, cuts, burns, chemical exposures, etc.

A wide variety of gloves are available to employees to provide adequate hand protection while performing various work activities. Glove selection should be based on work activity, chemical compatibility, comfort and durability. It is imperative that employees understand that no one glove will protect against all hazards. Glove selection should be made using good intelligence and known limitations.

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing company provided gloves to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

All employees required to wear protective gloves must routinely inspect and properly care for their assigned gloves (if the gloves are not disposable).

1.6.12 Head Protection - Hard Hats

It is the policy of the company that as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved hard hats to help prevent head injuries, including those resulting from falling objects, bumping the head against a fixed object, or electrical shock. Employees in the following designated work areas are required to wear hard hats:

A. All areas where there exists the potential to be impacted by falling objects

B. Any field operations that have existed head protection requirements

C. In an enclosed or confined space where overhead obstructions could injure an employee

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing company provided hard hats to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

All employees required to wear hard hats must routinely inspect and properly care for their hard hats.

The proper selection and use of personal protective equipment (PPE) is an important element of the Environmental Management health and safety program. All employees are encouraged to adhere to company policy in this regard. PPE such as hard hats, gloves, work boots, etc. supplied by the employee must be approved before being used on any Environmental Management projects. The equipment has been provided to protect you, but it only works when it is used properly.

Appendix A

29 CFR 1910.132

Appendix B

Blank Hazard Assessment Form

Appendix C

Confined Space Entry Hazard Assessment Form

Appendix D

General Office Work Hazard Assessment Form

Appendix E

General Yard Work Hazard Assessment Form

Appendix F

Metal Cutting Hazard Assessment Form

Appendix G

Mix Room Hazard Assessment Form

Appendix H

Welding Hazard Assessment Form

Process Safety Management

1.1 Definition.

Process Safety Management (PSM) is a United States regulation intended to prevent a disaster like the 1984 Bhopal Disaster.

"Unexpected releases of toxic, reactive, or flammable liquids and gases in processes involving highly hazardous chemicals have been reported for many years. Incidents continue to occur in various industries that use highly hazardous chemicals which may be toxic, reactive, flammable, or explosive, or may exhibit a combination of these properties. Regardless of the industry that uses these highly hazardous chemicals, there is a potential for an accidental release any time they are not properly controlled. This, in turn, creates the possibility of disaster. To help assure safe and healthful workplaces, OSHA has issued the Process Safety Management (PSM) of Highly Hazardous Chemicals standard (29 CFR 1910.119)...."

See http://www.osha.gov/SLTC/processsafetymanagement/.

1.2 Introduction to Process Safety Management.

The major objective of PSM of highly hazardous chemicals is to prevent unwanted releases of hazardous chemicals especially into locations which could expose employees and others to serious hazards. An effective PSM program requires a systematic approach to evaluating the whole process. Using this approach the process design, process technology, operational and maintenance activities and procedures, non-routine activities and procedures, emergency preparedness plans and procedures, training programs, and other elements which impact the process are all considered in the evaluation. The various lines of defense have been incorporated into the design and operation of the process. This is to prevent or mitigate the release of hazardous chemicals needed to be evaluated and strengthened to assure their effectiveness at each level. **PSM is the proactive identification, evaluation and mitigation or prevention of chemical releases that could occur as a result of failures in process, procedures or equipment.**

ENVIRONMENTAL MANAGEMENT has developed this policy to enlighten our employees and make them aware of the current state of hazard evaluation. ENVIRONMENTAL MANAGEMENT could use a PSM evaluation process on any of its current job processes but there is no requirement to do so. While we might have no daily ongoing processes that require PSM due to the chemicals and/or volumes involved, our clients are using this process and we should be aware and in sync with their safety evaluation process and criteria.

The PSM standard targets highly hazardous chemicals (see back pages) that have the potential to cause a catastrophic incident. This standard, as a whole, is to aid employers in their efforts to prevent or mitigate episodic chemical releases that could lead to a catastrophe in the workplace and possibly to the surrounding community. This OSHA standard is required by the Clean Air Act Amendments as is the Environmental Protection Agency's Risk Management Plan.

A PSM program is a critical component for those organizations that store, and use highly hazardous chemicals in a production process. ENVIRONMENTAL MANAGEMENT does not have applicable production processes. The following criteria would warrant use of this process but ENVIRONMENTAL MANAGEMENT does not fall under these stated guidelines.

- We do not store at or above the threshold quantities any chemical listed in Appendix A of 29 CFR1910.119. (See back pages)
- We do not store on-site any flammable liquids or gases in a quantity of 10,000 pounds or greater in accordance to 29 CFR 1910.119(a) (1) (ii)
- All hydrocarbon fuel storage stored on-site is for workplace consumption in accordance with 29 CFR 1910.119 (a) (1) (ii) (A)

There are fourteen elements involved in a PSM evaluation. They have been applied to identifiable job tasks within many of the client companies ENVIRONMENTAL MANAGEMENT provides services. The evaluation process would have been documented and notes retained for future reference. Any identified upgrades and changes in the job process would be integrated into the process and additional training provided, if necessary. Some of the job processes within ENVIRONMENTAL MANAGEMENT that could be affected by PSM polices of our clients include:

Emergency Response

Product Distribution Program

Remedial Action

Storage Tank Management & Removal

Disposal & Transportation

The elements of PSM that ENVIRONMENTAL MANAGEMENT employees would see at a PSM covered job site are:

1.2.1 Employee Involvement in Process Safety Management.

Section 304 of the Clean Air Act Amendments states that employers are to consult with their employees regarding the efforts in the development and implementation of the PSM programs elements and hazard assessments. Section 304 also requires employers to train and educate their employees and to inform affected employees of the findings from incident investigations required by the PSM program.

Refresher training shall be provided as often as necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures and any implemented changes of the process.

At ENVIRONMENTAL MANAGEMENT, we work with clients that have chemical processes that are covered by their own written policies. Trade secret information will remain confidential. These policies involve EMI as contractors and their PSM policies, which will require training and information needed for us to do a job safely at their facility. We will review job needs and keep employees involved and informed about safety and health issues identified before the job begins. This would be discussed prior to and at the job site, assuring that all involved employees understand the identified issues.

1.2.3 Process Hazard Analysis.

A process hazard analysis (PHA), sometimes called a process hazard evaluation, is one of the most important elements of the PSM program. A PHA is an organized and systematic effort to identify and analyze the significance of potential hazards associated with the processing or handling of highly hazardous chemicals. A PHA provides information which will assist employers and employees in making decisions for improving safety and reducing the consequences of unwanted or unplanned releases of hazardous chemicals. A PHA is directed toward analyzing potential causes and consequences of fires, explosions, releases of toxic or flammable chemicals and major spills of hazardous chemicals. The PHA focuses on equipment, instrumentation, utilities, human actions (routine and non-routine), and external factors that might impact the process. Any hazards found will be communicated to the host facility, including any hazards that are caused by any unique work task being performed. The identification of any previous incident which did have or had a potential for catastrophic consequences is pertinent. These considerations assist in determining the hazards and potential failure points or failure modes in a process.

ENVIRONMENTAL MANAGEMENT employees shall always be aware of these factors when on our client's facilities. The client, if using PSM, would have had their process undergo extensive scrutiny and should have some options for conceivable and contrived events. It might prove useful on some responses to be made aware of these different scenarios worked out with PHA. Our employees expected response to an event (either expected or unexpected) might have been covered and foretold by the PSA analysis of that clients job process.

1.2.4 Employee Training.

All employees involved with highly hazardous chemicals need to fully understand the safety and health hazards of the chemicals and processes they work with for the protection of themselves, their fellow employees and the citizens of nearby communities. Training should include emphasis on the specific job process safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks. Training shall be documented.

Training conducted in compliance with 1910.1200, the Hazard Communication standard, will help employees to be more knowledgeable about the chemicals they work with as well as familiarize them with reading and understanding MSDS information. ENVIRONMENTAL MANAGEMENT employees will be trained at levels above the requirements due to our work to mitigate situations of a release for our clients. ENVIRONMENTAL MANAGEMENT employees might be asked to undergo site specific training at our clients' facilities before we do our job.

1.2.5 Contractors.

Employers or clients who use contractors (ENVIRONMENTAL MANAGEMENT) to perform work in and around processes that involve highly hazardous chemicals, will have established a screening process so that they hire and use contractors who accomplish the desired job tasks without compromising the safety and health of employees at a facility. Additionally, we must assure that ENVIRONMENTAL MANAGEMENT personnel have the appropriate job skills, knowledge and site specific information for each of our clients.

As ENVIRONMENTAL MANAGEMENT often performs very specialized and potentially hazardous tasks including confined space entry activities and non-routine clean-up activities, it is quite important that their activities be controlled while they are working on or near a covered process. A permit system or work authorization system for these activities would also be helpful to all affected employers. The use of

a work authorization system keeps an employer, ENVIRONMENTAL MANAGEMENT or a client, informed of contract employee activities, and as a benefit the employer will have better coordination and more management control over the work being performed in the process area. A well run and well maintained system where employee safety is fully recognized will benefit all of those who work in the facility whether they are contract employees, clients or employees of ENVIRONMENTAL MANAGEMENT.

1.2.6 Non-routine Work Authorizations. (Hot work permits)

Non-routine work which is conducted in process areas needs to be controlled by ENVIRONMENTAL MANAGEMENT or the client in a consistent manner. The hazards identified involving the work that is to be accomplished must be communicated to those doing the work, but also to those operating personnel whose work could affect the safety of the process. A work authorization notice or permit must have a procedure that describes the steps the maintenance supervisor, contractor representative, ENVIRONMENTAL MANAGEMENT, or other person needs to follow to obtain the necessary clearance to get the job started. Hot work shall not be performed until a Hot Work Permit is issued from the host facility.

The work authorization procedures need to reference and coordinate, as applicable, lockout/tagout procedures, line breaking procedures, confined space entry procedures and hot work authorizations. This procedure also needs to provide clear steps to follow once the job is completed in order to provide closure for those that need to know the job is now completed and equipment can be returned to normal.

1.2.7 Managing Change.

To properly manage changes to technology, equipment and facilities, one must define what is meant by change. In the PSM standard, change includes all modifications to equipment, procedures, raw materials and processing conditions other than "replacement in kind." These changes need to be properly managed by identifying and reviewing them prior to implementation of the change. While the operator must have the flexibility to maintain safe operation within the established parameters, any operation outside of these parameters requires review and approval.

Management of change covers such as changes in process technology and changes to equipment and instrumentation. Changes in process technology can result from changes in production rates, raw materials, experimentation, equipment unavailability, new equipment, new product development, change in catalyst and changes in operating conditions to improve yield or quality. Equipment changes include among others change in materials of construction, equipment specifications, piping pre-arrangements, experimental equipment, computer program revisions and changes in alarms and interlocks.

Temporary changes have caused a number of catastrophes over the years, and employers need to establish ways to detect temporary changes as well as those that are permanent. It is important that a time limit for temporary changes be established and monitored since, without control, these changes may tend to become permanent. Proper documentation and review of these changes is invaluable in assuring that the safety and health considerations are being incorporated into the operating procedures and the job process.

ENVIRONMENTAL MANAGEMENT employees should be cognizant if they recognize or have been told temporary changes have been employed on a job site. Consider if that noted change could feasibly affect the job effort.

1.2.8 Investigation of Incidents.

Incident investigation is the process of identifying the underlying causes of incidents and implementing steps to prevent similar events from occurring. The intent of an incident investigation is for us to learn from past experiences and thus avoid repeating past mistakes. The incidents for which OSHA expects us to become aware and to investigate are the types of events which result in or could reasonably have resulted in a catastrophic release. Some of the events are sometimes referred to as "near misses," meaning that a serious consequence did not occur, but could have. All incidents and near misses will be reported to the host client immediately.

ENVIRONMENTAL MANAGEMENT will continue to investigate incidents that occur to their employees by means of an Employee Report of Incident. Witness information, needed documentation, Supervisors review and a Safety Manager report should be forthcoming from the incident. Employees in the job area where the incident occurred may be consulted or interviewed. The report, its findings and recommendations are to be shared with those who can benefit from the information. The cooperation of employees is essential to an effective incident investigation. The focus of the investigation should be to obtain facts, and not to place blame. The investigation process should clearly deal with all involved individuals in a fair, open and consistent manner.

ENVIRONMENTAL MANAGEMENT Incident investigation reports shall be retained for five years.

1.2.9 Emergency Preparedness.

ENVIRONMENTAL MANAGEMENT will address what actions employees are to take when there is an unwanted release of highly hazardous chemicals. ENVIRONMENTAL MANAGEMENT is called upon by clients to provide emergency response to a variety of hazardous and non-hazardous releases. Emergency preparedness are those that will be relied on along with the secondary lines of defense when the primary lines of defense which are used to prevent an unwanted release fail to stop the release. Because we are an emergency response company and depending on the scope of the incident, ENVIRONMENTAL MANAGEMENT will:

- ENVIRONMENTAL MANAGEMENT employees will mobilize to stop small or minor incidental releases.
- ENVIRONMENTAL MANAGEMENT will handle the significant releases at our facility and at our clients' job sites. One of our core services is to provide emergency response and remediation to our customers. We provide the emergency response and clean-up required at any of our clients projects. Safely providing these services by means of planning, engineering controls and proper use of PPE is the foremost concern of responders.
- ENVIRONMENTAL MANAGEMENT has developed the necessary plans and procedures, and will appropriately train employees in their emergency duties and responsibilities and then implement these lines of defense.
- ENVIRONMENTAL MANAGEMENT has an emergency action plan which will facilitate the prompt evacuation of employees when an unwanted release of highly hazardous chemical occurs. This means that ENVIRONMENTAL MANAGEMENT has a plan that will be activated by an alarm system to alert employees when to evacuate and, that any employees who are physically impaired, will have the necessary support and assistance to get them to the safe zone as well. The intent of these requirements is to alert and move employees to a safe zone quickly.

- Unwanted incidental releases of highly hazardous chemicals in the facility area is addressed in the Contingency and Emergency Action Plan as to what actions employees are to take. If the employees need to evacuate the area, then the emergency action plan will be activated. For outdoor releases where wind direction is important for selecting the safe route to a refuge area, the flag that can be seen throughout the facility area, should be used. Employees can move in the direction of cross wind to upwind to gain safe access to the refuge area by knowing the wind direction.

The Incident Coordinator will be determined and which specific employees also that will be in the release area to control or stop the emergency or release. Preplanning for handling incidental releases for minor emergencies in the process area along with appropriate equipment for the hazards is provided, and training is kept current for those employees who will perform the emergency work.

ENVIRONMENTAL MANAGEMENT's training program, which includes the 1910.120, the Hazardous Waste Operations and Emergency Response (HAZWOPER) standard training, does address the training needs for employees who are expected to handle incidental or minor releases of hazardous materials at our facility and the customers.

If outside assistance is necessary, such as through subcontractors, mutual aid agreements between employers or local government emergency response organizations, these emergency responders should also be covered by their training and HAZWOPER.

2.1 List of Highly Hazardous Chemicals, Toxics and Reactives (Mandatory)

These items may be encountered at our client's job sites.

This appendix contains a listing of toxic and reactive highly hazardous chemicals which present a potential for a catastrophic event at or above the threshold quantity.

CHEMICAL name	CAS*	TQ** (lbs)
Acetaldehyde	75-07-0	2500
Acrolein (2-Propenal)	107-02-8	150
Acrylyl Chloride	814-68-6	250
Allyl Chloride	107-05-1	1000
Allylamine	107-11-9	1000
Alkylaluminums	Varies	5000
Ammonia, Anhydrous	7664-41-7	10000
Ammonia solutions (<ls-thn-eq>44% ammonia by weight)	7664-41-7	15000
Ammonium Perchlorate	7790-98-9	7500
Ammonium Permanganate	7787-36-2	7500
Arsine (also called Arsenic Hydride)	7784-42-1	100
Bis(Chloromethyl) Ether	542-88-1	100
Boron Trichloride	10294-34-5	2500
Boron Trifluoride	7637-07-2	250
Bromine	7726-95-6	1500
Bromine Chloride	13863-41-7	1500

Bromine Pentafluoride..... 7789-30-2 2500

Bromine Trifluoride..... 7787-71-5 15000

3-Bromopropyne (also called Propargyl Bromide)..... 106-96-7 100

Butyl Hydroperoxide (Tertiary)..... 75-91-2 5000

Butyl Perbenzoate (Tertiary)..... 614-45-9 7500

Carbonyl Chloride (see Phosgene)..... 75-44-5 100

Carbonyl Fluoride..... 353-50-4 2500

Cellulose Nitrate (concentration <ls-thn- 9004-70-0 2500

eq>12.6%nitrogen.....

Chlorine..... 7782-50-5 1500

Chlorine Dioxide..... 10049-04-4 1000

Chlorine Pentrafluoride..... 13637-63-3 1000

Chlorine Trifluoride..... 7790-91-2 1000

Chlorodiethylaluminum (also called Diethylaluminum 96-10-6 5000

Chloride).....

1-Chloro-2,4-Dinitrobenzene..... 97-00-7 5000

Chloromethyl Methyl Ether..... 107-30-2 500

Chloropicrin..... 76-06-2 500

Chloropicrin and Methyl Bromide mixture..... None 1500

Chloropicrin and Methyl Chloride mixture..... None 1500

Cumene Hydroperoxide..... 80-15-9 5000

Cyanogen..... 460-19-5 2500

Cyanogen Chloride..... 506-77-4 500

Cyanuric Fluoride..... 675-14-9 100

Diacetyl Peroxide (Concentration <ls-thn-eq>70%)... 110-22-5 5000

Diazomethane..... 334-88-3 500

Dibenzoyl Peroxide..... 94-36-0 7500

Diborane..... 19287-45-7 100

Dibutyl Peroxide (Tertiary)..... 110-05-4 5000

Dichloro Acetylene..... 7572-29-4 250

Dichlorosilane..... 4109-96-0 2500

Diethylzinc..... 557-20-0 10000

Diisopropyl Peroxydicarbonate..... 105-64-6 7500

Dilaluroyl Peroxide..... 105-74-8 7500

Dimethyldichlorosilane..... 75-78-5 1000

Dimethylhydrazine, 1,1-..... 57-14-7 1000

Dimethylamine, Anhydrous..... 124-40-3 2500

2,4-Dinitroaniline..... 97-02-9 5000

Ethyl Methyl Ketone Peroxide (also Methyl Ethyl 1338-23-4 5000

Ketone Peroxide;concentration <ls-thn-eq>60%).....

Ethyl Nitrite..... 109-95-5 5000

Ethylamine..... 75-04-7 7500

Ethylene Fluorohydrin..... 371-62-0 100

Ethylene Oxide..... 75-21-8 5000

Ethyleneimine..... 151-56-4 1000

Fluorine..... 7782-41-4 1000

Formaldehyde (Formalin)..... 50-00-0 1000

Furan..... 110-00-9 500

Hexafluoroacetone..... 684-16-2 5000

Hydrochloric Acid, Anhydrous..... 7647-01-0 5000

Hydrofluoric Acid, Anhydrous..... 7664-39-3 1000

Hydrogen Bromide..... 10035-10-6 5000

Hydrogen Chloride..... 7647-01-0 5000

Hydrogen Cyanide, Anhydrous..... 74-90-8 1000

Hydrogen Fluoride..... 7664-39-3 1000

Hydrogen Peroxide (52% by weight or greater)..... 7722-84-1 7500

Hydrogen Selenide..... 7783-07-5 150

Hydrogen Sulfide..... 7783-06-4 1500

Hydroxylamine..... 7803-49-8 2500

Iron, Pentacarbonyl..... 13463-40-6 250

Isopropylamine..... 75-31-0 5000

Ketene..... 463-51-4 100

Methacrylaldehyde..... 78-85-3 1000

Methacryloyl Chloride..... 920-46-7 150

Methacryloyloxyethyl Isocyanate..... 30674-80-7 100

Methyl Acrylonitrile..... 126-98-7 250

Methylamine, Anhydrous..... 74-89-5 1000

Methyl Bromide..... 74-83-9 2500

Methyl Chloride..... 74-87-3 15000

Methyl Chloroformate..... 79-22-1 500

Methyl Ethyl Ketone Peroxide (concentration <ls-thn- 1338-23-4 5000

eq>60%).....

Methyl Fluoroacetate..... 453-18-9 100

Methyl Fluorosulfate..... 421-20-5 100

Methyl Hydrazine..... 60-34-4 100

Methyl Iodide..... 74-88-4 7500

Methyl Isocyanate..... 624-83-9 250

Methyl Mercaptan..... 74-93-1 5000

Methyl Vinyl Ketone..... 79-84-4 100

Methyltrichlorosilane..... 75-79-6 500

Nickel Carbonly (Nickel Tetracarbonyl)..... 13463-39-3 150

Nitric Acid (94.5% by weight or greater)..... 7697-37-2 500

Nitric Oxide..... 10102-43-9 250

Nitroaniline (para Nitroaniline..... 100-01-6 5000

Nitromethane..... 75-52-5 2500

Nitrogen Dioxide..... 10102-44-0 250

Nitrogen Oxides (NO; NO2; N204; N203)..... 10102-44-0 250

Nitrogen Tetroxide (also called Nitrogen Peroxide). 10544-72-6 250

Nitrogen Trifluoride..... 7783-54-2 5000

Nitrogen Trioxide..... 10544-73-7 250

Oleum (65% to 80% by weight; also called Fuming Sulfuric Acid)..... 8014-94-7 1000

Osmium Tetroxide..... 20816-12-0 100

Oxygen Difluoride (Fluorine Monoxide)..... 7783-41-7 100

Ozone..... 10028-15-6 100

Pentaborane..... 19624-22-7 100

Peracetic Acid (concentration <ls-thn-eq>60% Acetic Acid; also called Peroxyacetic Acid)..... 79-21-0 1000

Perchloric Acid (concentration <ls-thn-eq>60% by weight)..... 7601-90-3 5000

Perchloromethyl Mercaptan..... 594-42-3 150

Perchloryl Fluoride..... 7616-94-6 5000

Peroxyacetic Acid (concentration <ls-thn-eq>60% Acetic Acid; also called Peracetic Acid)..... 79-21-0 1000

Phosgene (also called Carbonyl Chloride)..... 75-44-5 100

Phosphine (Hydrogen Phosphide)..... 7803-51-2 100

Phosphorus Oxychloride (also called Phosphoryl Chloride)..... 10025-87-3 1000

Phosphorus Trichloride..... 7719-12-2 1000

Phosphoryl Chloride (also called Phosphorus Oxychloride)..... 10025-87-3 1000

Propargyl Bromide..... 106-96-7 100

Propyl Nitrate..... 627-3-4 2500

Sarin..... 107-44-8 100

Selenium Hexafluoride..... 7783-79-1 1000

Stibine (Antimony Hydride)..... 7803-52-3 500

Sulfur Dioxide (liquid)..... 7446-09-5 1000

Sulfur Pentafluoride..... 5714-22-7 250

Sulfur Tetrafluoride..... 7783-60-0 250

Sulfur Trioxide (also called Sulfuric Anhydride)... 7446-11-9 1000

Sulfuric Anhydride (also called Sulfur Trioxide)... 7446-11-9 1000

Tellurium Hexafluoride..... 7783-80-4 250

Tetrafluoroethylene..... 116-14-3 5000

Tetrafluorohydrazine..... 10036-47-2 5000

Tetramethyl Lead..... 75-74-1 1000

Thionyl Chloride..... 7719-09-7 250

Trichloro (chloromethyl) Silane..... 1558-25-4 100

Trichloro (dichlorophenyl) Silane..... 27137-85-5 2500

Trichlorosilane..... 10025-78-2 5000

Trifluorochloroethylene..... 79-38-9 10000

Trimethyoxysilane..... 2487-90-3 1500

***Chemical Abstract Service Number.**

****Threshold Quantity in Pounds (Amount necessary to be covered by this standard).**

RCRA

Environmental
MANAGEMENT

2004

1.1 Hazardous Waste Operations and Emergency Response

Environmental Management has developed and maintains a Hazardous Waste Operations and Emergency Response Plan (HAZWOPER) in line with 29 CFR 1910.120. This plan is available for review and in kept in the library of the main office building and in the Health and Safety Database. Additionally, the training officer for Environmental Management is responsible for developing and maintaining the Hazardous Waste Operations and Emergency Response (HAZWOPER) training plan and ensuring that all employees are updated as required by the regulation.

1.1.1 General Information

A. As part of the HAZWOPER program, Environmental Management has developed and implemented a program to train employees (including contractors and subcontractors) performing hazardous waste or emergency response operations to the level and degree of exposure they are likely to encounter. Portions of this program include development of a detailed Emergency Response Plan, a Medical Surveillance Program, PPE and Respiratory Protection Programs, and inclusion of local response authorities when appropriate. In addition, Environmental Management has also implemented procedures for introducing effective new technologies that provide improved worker protection in hazardous waste operations and spill/leak cleanup. In accordance with 29 CFR 1910.120 (e)(1)(i) all employees are provided 40 clock hours of classroom and hands-on training, 3 days of field experience with a qualified supervisor and an annual refresher to reinforce concepts or introduce new information or technologies.

B. Other forms of worker protection include decontamination procedures at the Environmental Management facility utilizing emergency shower and eyewash stations located throughout the facility as well as use of portable decontamination equipment available for site specific use. Numerous engineering controls, such as ventilation fans, dikes and berms, sump pumps, etc., also ensure employee protection from hazardous materials exposures. In addition, the perimeter of the working area of the facility is bermed and monitor wells are in place to monitor ground water contamination levels.

1.2 Organizational Structure

The President and the Terminal Manager of Environmental Management have the authority and responsibility to direct all hazardous waste operations. The Environmental Management Health and Safety Officer, or the on-site supervisor, shall serve as the Site Health and Safety Officer and maintain the responsibility and authority to develop and implement the Site Health and Safety Plan and verify compliance. Other personnel needed for hazardous waste site operations and emergency response, such as

subcontractors, are required to furnish a Site Health and Safety Plan or thoroughly understand and follow Environmental Management guidelines.

1.2.1 The organizational structure of the Environmental Management facility, lines of authority, responsibility and communication are as follows:

A. President delegates authority to insure regulatory compliance

B. Terminal Manager is responsible for the direct supervision of field personnel at the facility

C. The Health and Safety Officer is responsible for all safety programs, compliance issues, and program revisions

D. Training Officer is responsible for insuring training for all employees

E. Job Supervisors are responsible to establish and enforce proper safety procedures using standard operating procedures

F. Employees are required to follow all guidelines, directives, and SOP's to insure a safe working environment.

This organizational structure shall be reviewed and updated as necessary to reflect the current status of site operations.

1.3 HAZWOPER Training

Training makes employees aware of the hazards and potential hazards that they may encounter and provides the necessary knowledge and skills to perform their work functions with minimal risk to their health and safety. Environmental Management has developed a training program for all employees who have the potential to be exposed to health and safety hazards.

1.3.1 Supervisors and field workers must be trained to:

A. Recognize safety hazards and prevent them

B. Select, maintain, and use respirators and PPE properly

C. Understand engineering controls and their use

D. Use proper decontamination procedures

E. Understand the Emergency Response Plan, Medical Surveillance Program requirements, Confined Space Entry procedures, Spill Containment procedures and other appropriate work practices

F. Know the names of personnel and the alternates responsible for site health and safety.

1.3.2 The amount of training provided will differ with the nature of work operations performed by groups of employees. Employees will not perform any hazardous waste or emergency response operations unless they have been trained and certified as having completed the necessary training. All emergency responders will also receive refresher training sufficient to maintain or demonstrate competency annually.

1.3.3 The Environmental Management Training Officer shall be the person responsible for organizing and conducting the training of all Environmental Management employees. Training requirements for employees will be determined using the following criteria:

A. All employees shall receive training under 29 CFR 1910.1200

B. All employees (excluding office personnel) shall receive training under 29 CFR 1910.120

Training will be conducted in a classroom setting utilizing instructor guided lesson plans. The classes may include lectures, group discussion, role playing, and audio-visual presentations and, in many instances, hands-on participation. Employees will be required to attend training classes before beginning any work assignment dealing with hazardous materials. All Environmental Management emergency responders shall be trained to the level required by their job function and responsibility prior to performing any hazardous waste operation. An overall evaluation will be required in all training classes, and a certificate showing satisfactory completion of the training will be awarded. The Environmental Management training program assistant will maintain all certificates on file.

1.4 Site Specific Health and Safety Plans

The Site Health and Safety Plan shall serve to identify the hazards of each phase of a specific site operation and shall be kept at the work site until the project is complete. The Health and Safety Plan addresses the health and safety hazards of each phase of site operations and includes the requirements and procedures for employee protection. The Environmental Management Site Specific Health and Safety Plan aids in eliminating or effectively controlling anticipated health and safety hazards at work sites.

Site health and safety risks or a hazards analysis for each site task or operation should be outlined in the Site Health and Safety Plan. Pre-entry briefings must be held prior to initiating any on-site activities, and at other times as deemed necessary to ensure that employees are aware of the Site Health and Safety Plan. Environmental Management

ascertains that this procedure is being followed by requiring that a Site Health and Safety Plan is completed before any operations are performed. Each employee shall be briefed to the potential hazards involved with the specific project and required to signify their understanding by signing the plan after being briefed.

1.5 Medical Surveillance Program

In accordance with 29 CFR 1910.120 (f)(1) all affected employees are included in a medical monitoring program. (Refer to Medical Surveillance Program section in this document.)

1.6 Engineering Controls, Work Practices, Personal Protective Equipment (PPE)

Whenever possible, Environmental Management shall attempt to utilize engineering controls and/or worker practices to reduce, maintain, or eliminate employee exposure to hazardous materials. When engineering controls or work practices prove to be infeasible, appropriate PPE shall be utilized. Control methodologies shall be outlined in the Site Specific Health & Safety Plan.

1.7 Personal Protection Equipment

Personal protective equipment shall be required during all hazardous materials operations. (Refer to Personal Protective Equipment section in this document.)

1.8 Monitoring

Monitoring shall be performed when there exists the possibility of employee exposure to hazardous concentrations of hazardous substances. A proactive monitoring program allows for the selection of engineering, administrative/worker controls and/or PPE to protect employees from a chemical exposure.
Air monitoring shall be used to identify and quantify airborne levels of hazardous materials to determine appropriate levels of protection.

Monitoring of high-risk employees shall be performed to determine the effects of those employees exposed to the highest levels after cleanup or response activities. This group can serve as a representative sample of all potentially exposed workers. If those employees likely to have been exposed to the highest levels have received exposures over the PEL or other published limits, then monitoring shall continue to determine exposure of all employees.

Upon initial entry into an unknown environment air monitoring shall be performed to determine if an Immediately Dangerous to Life or Health, (IDLH) condition exists. Atmospheric conditions that constitute an IDLH hazard include:

- Radioactivity — Levels greater than 1 Milirem
- Flammability — 10% of the LEL
- Oxygen — <19.5% or >23.5%
- Toxicity — >PEL

When it is not possible to insure a clean atmosphere or when conditions may change rapidly, periodic monitoring shall be used. Additional guidance can be found in 29 CFR 1910.120 (h).

1.9 Decontamination

It is the policy of Environmental Management to implement appropriate decontamination procedures at all hazardous materials incidents. The procedures shall be developed and communicated to all affected employees before any employees or equipment enters an area of potential contamination.
SOP's shall be developed and utilized at all decontamination sites to minimize employee or equipment exposure.
All employees exiting an area of contamination shall be appropriately decontaminated.
It shall be the responsibility of the on-site safety officer to insure effectiveness of the decontamination process and to take appropriate actions when he or she determines the process to be ineffective.
Protective clothing and equipment shall be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness. Employees whose non-impermeable clothing becomes wetted with hazardous substances shall immediately remove the clothing and proceed to shower and the clothing disposed of or decontaminated before it is removed from the work zone.
Consideration should be given to the location of the decontamination area. Weather, geography, physical impediments, etc must be addressed.

1.10 Sampling and Instrumentation

1.10.1 The environmental sampling techniques and instrumentation utilized at the Environmental Management facility, including the methods of maintenance and calibration of monitoring and sampling equipment, are as follows:

A. Water sources are sampled and delivered to an environmental laboratory for analysis

B. CGI, FID, and PID meters are used for regular site monitoring and/or confined space entry. These instruments are on a regular maintenance program and must be calibrated before use.

1.11 Confined Space Entry

A confined space is defined as any location that, by design, has limited openings for entry and egress, is not intended for continuous employee occupancy, and is so enclosed that natural ventilation may not reduce air contaminants to levels below the threshold limit value. Entry into confined spaces without the proper precautions could result in injury and/or impairment due to:

* Atmosphere that is flammable or explosive

* Lack of oxygen to support life

* Toxic materials that upon contact or inhalation could cause injury, illness, or death

* General safety hazards such as steam, high pressure materials, or other work area hazards that could result in injuries

1.11.1 Examples of confined spaces include manholes, stacks, pipes, storage tanks, trailers, tank cars, pits, sumps, hoppers and bins. It is important to note that even some buildings might be considered a confined space (e.g., an abandoned chemical laboratory with closed doors or windows).

1.11.2 Pre Job Planning and Space Preparation

A. The entry supervisor must determine that the confined space is properly isolated by binding, disconnecting, and/or by following the Lockout/Tagout procedure. The entry supervisor must also discuss with all entrants the hazards of the space, communication methods and emergency procedures during the confined space entry.

B. Eliminate conditions that would make it unsafe to remove an entrance or access cover before removing it.

C. Promptly guard the opening to prevent an accidental fall through the opening and to protect each employee working in the space from foreign objects entering the space.

D. If applicable, wash, steam, ventilate or de-gas the confined space to properly free it of possible contaminates. Vent vapors to a safe location.

E. Do not allow unauthorized personnel to enter a confined space. Barricade and/or guard all confined spaces to prevent the entry of unauthorized entrants.

F. Ensure that vehicles or other equipment is positioned so that exhaust fumes do not enter a confined space.

1.11.3 Pre-entry Safety Meeting

A. The entry supervisor must declare when the confined space is ready for entry.

B. The entry supervisor must hold a pre-entry safety meeting to discuss all requirements and procedures with all authorized entrants and attendants involved with the entry. Topics to be discussed are previous contents of the space, vessel coating, actions in the event of a power failure, etc.

C. Each employee entering a confined space should wear a safety belt equipped with a lifeline for evacuation purposes in case of an emergency. At least one person, trained in first aid and respiration, should be immediately available outside the confined space to provide assistance if needed.

D. The entry supervisor must coordinate entry operations when employees of more than one company are working simultaneously in the confined space. This coordination is necessary so that one company's work does not endanger the employees of another company.

1.12 Spill Containment

All employees have received training in spill control and have the available equipment and supplies to control on-site releases. In addition, the perimeter of the facility serves as a berm to contain releases of materials.

RESPIRATORY PROTECTION PROGRAM

Environmental
MANAGEMENT

2016

1.1 Goal

The primary objective of this program is to reduce or eliminate the concentration of airborne contaminants to which an employee may be exposed to by reducing or eliminating harmful dusts, fogs, fumes, mists, gases, smokes, sprays or vapors.

It is the intent of Environmental Management to accomplish this objective when feasible through engineering control measures such as enclosure or confinement of the operation, ventilation or substitution of less toxic materials, administrative controls in the form of training, and accountability of personnel, etc. When these methods prove to be inadequate, proper respiratory protection shall be utilized in accordance with 29 CFR 1910.134 and company policy.

1.2 Purpose

The purpose of this program is to insure the highest level of safety to those individuals requiring respiratory protection. All respiratory equipment such as dust masks, air-purifying respirators, self-contained breathing apparatus, and supplied-air respirators shall be provided by Environmental Management to employees at no cost. All training and medical evaluations shall also be the responsibility of the company.

1.3 Employer Responsibilities

1.3.1 Through the development of this program, Environmental Management is committed to providing the following elements to those employees who are required to wear respiratory protection in the workplace. The Health & Safety Officer in conjunction with the Training Officer shall have total responsibility to oversee the respiratory program and to conduct required evaluations of program effectiveness and training. The following procedures for respirator selection in the workplace shall be part of this program:

A. Ensure that all medical evaluations are performed

B. Perform fit testing for tight-fitting respirators

C. Establish procedures for proper use of respirators in both routine and emergency situations

D. Outline procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators

E. Provide an adequate air quality, quantity and flow for atmosphere-supplying respirators

F. Provide training to employees in the respiratory hazards to which they are potentially exposed during routine and emergency situations

G. Provide training to employees in the proper donning and doffing of respirators, limitations of use, and proper cleaning and maintenance

H. Procedures to effectively evaluate and revise the program elements

1.4 Employee Responsibilities

1.4.1 Personal safety in many cases is the responsibility of the employee. When using respiratory protective equipment all employees should perform the following actions to ensure his/her own safety:

A. Employees shall only wear the same, type, model and size respirator in which he/she was fit tested

B. Inspect the respirator before and after each use

C. Always perform a positive and negative seal check before donning respirator

D. Determine compatibility of material with the cartridge or filter selected

E. Be cognizant of changes in the environment or equipment and always be prepared to leave an area if an atmospheric hazard develops

F. Clean, disinfect, inspect and properly store respirator after each use

G. Report any defects or malfunctions to a supervisor or the program administrator

1.5 Selection of Respirators

1.5.1 Based on the potential hazards that may be encountered during various Environmental Management operations, a wide range of respiratory protective equipment shall be available for employee use. The following minimum requirements shall be the responsibility of the company:

A. All respirators shall be NIOSH certified and shall not be altered in any manner

B. Selection of respiratory equipment shall be based on a reasonable estimate of the hazard, and identification of the contaminant's chemical and physical state

C. When formal identification and a reasonable estimate of the respiratory hazard cannot be made the atmosphere shall be declared IDLH

1.5.2 Types of Respirators

A. Environmental Management shall supply Scott AV 2000 full face respirators to all field technicians and supervisors. This respirator is available in small, large, and extra-large sizes and will accommodate APR, SCBA, and SAR applications.

B. Scott XCEL half face respirators shall be issued to employees who are certified to handle asbestos and asbestos related materials. This respirator is only available in large sizes but can be ordered in a smaller size if needed. The Scott XCEL half face respirator will primarily be used during asbestos related work.

C. Environmental Management shall provide N95 dust masks for all employees. This dust mask is intended for voluntary use only and employees will be required to fill out a Respiratory Protection Form D before use. See Appendix D. The N95 dust mask will primarily be used to reduce exposure to particulate aerosols free of oil in the maintenance shop and terminal yard.

1.6 Respirators for IDLH Conditions

Note: *IDLH means an atmosphere that poses an immediate threat to life, a condition which would cause irreversible adverse health effects, or would impair an individual's ability to escape from a dangerous atmosphere. IDLH atmospheres include unknown atmospheres and those that are oxygen deficient.*

1.6.1 The following respirators have been approved for IDLH environments:

A. A full facepiece pressure demand 30 minute self contained breathing apparatus (SCBA) certified by NIOSH

B. A combination full facepiece pressure demand supplied-air respirator

C. Full face air purifying respirator (APR), NIOSH certified for escape only from specific contaminants

1.7 Respirators for Non-IDLH Conditions

1.7.1 Cartridges

Environmental Management shall provide Scott half-face and full-face respirators to be used in non-IDLH conditions. Employee selection of respirators should be based on the physical and chemical form of the contaminant.

For protection against gases and vapors Environmental Management shall provide atmosphere-supplying respirators or the above mentioned air-purifying respirators.

Note: *Air purifying respirators may be used in non-IDLH conditions provided the respirator is equipped with an end-of-service-life-indicator (ESLI) certified by NIOSH or in the case of no existing ESLI an established change schedule. Warning qualities are no longer an acceptable means of determining cartridge effectiveness.*

The following "List of Methods" shall constitute standard operating procedure for a change schedule of cartridges. Additional data shall be utilized to update the change schedule as new information or technology warrants.

A. **Manufacturers Objective Data:** Information provided by the manufacturer on a specific cartridge.

B. **Experimental Methods:** Experimental breakthrough-time data from a laboratory based on worst case testing of simulated workplace conditions.

C. **Analogous Chemical Structures:** Service life values from other chemicals having analogous chemical structure to the contaminant under evaluation for breakthrough.

While some data may indicate a change-out schedule of less than 8 hours, it is an Environmental Management policy that a cartridge never be used for more than 8 hours. (The exception to this rule would be quantifiable documentation from one of the above test methods that a longer change-out period would pose no exposure risks to employees).

1.7.2 Types of Cartridges

Environmental Management uses the Scott 742 twin cartridge and filter series. There are numerous cartridges options available for use and specific cartridge types will be ordered for specific jobs. The following is lists of cartridges stored at the facility and are available for immediate employee use.

A. 7422-SC1 – Multi-Purpose

MULTIPURPOSE CARTIDGE (MPC) – Approved for respiratory protection against atmospheres containing Ammonia, Chlorine, Chlorine Dioxide, Formaldehyde, Hydrogen Chloride, Hydrogen Fluoride, Methylamine, Organic Vapors, Sulfur Dioxide, or FOR EXCAPE ONLY FROM Hydrogen Sulfide.

B. 7422-YC1 Organic Vapors and Acid Gas

Approved fro respiratory protection against atmospheres containing Chlorine, Chlorine Dioxide, Formaldehyde, Hydrogen Chloride, Organic Vapors, Sulfur Dioxide, or for escape only from Hydrogen Sulfide.

C. P-100 Particulate Filter

The P-100 filters are designed to provide a minimum filtration efficiency of 99.97% for the removal of oil based and non-oil based solid or liquid particulates.

1.7.3 Filters

For protection against particulates, Environmental Management shall provide:

A. An atmosphere-supplying respirator

B. An APR equipped with a filter certified by NIOSH under 30 CFR part 11 as a high efficiency particulate air (HEPA), or an APR equipped with a filter certified by NIOSH under 42 CFR part 84

1.8 Medical Evaluations

1.8.1 Using a respirator may place a physiological burden on employees that varies with the type of respirator worn, the job and workplace conditions, and the medical status of the user. Based on these factors all employees are required to undergo a medical evaluation by a physician or licensed healthcare professional (PLHCP) utilizing the medical questionnaire found in 29 CFR 1910.134 Appendix C.

A. The medical evaluation shall be performed by Mercy Clinic, located at 205 South Academy Road, Guthrie, OK.

B. The medical questionnaire found in 29 CFR 1910. 134 Appendix C shall be provided to the PLHCP for employee medical evaluations.

C. Any follow-up medical examinations deemed necessary shall be provided by Environmental Management at no cost to the employee. The follow-up exam shall include any medical tests, consultations, or diagnostic procedures as required.

D. The medical questionnaire and examinations shall be administered confidentially during normal work hours or at a time and place convenient to employees and shall be done in a manner that ensures understanding of the process.

E. The employee shall be afforded the opportunity to discuss the questionnaire or examination with PLHCP.

1.8.2 The following information must be provided to Mercy Clinic before a recommendation concerning an employee's ability to use a respirator can be made:

A. The type and weight of the respirator to be used by the employee

B. The duration and frequency of respirator use (including use for rescue and escape)

C. The expected physical work effort

D. Additional protective clothing and equipment to be worn

E. Temperature and humidity extremes that may be encountered

A copy of this written program, and a copy of 29 CFR 1910.134 (e), the Respiratory Standard shall be provided to Mercy Clinic.

1.9 Medical Determination

1.9.1 A written recommendation from the PHLCP regarding an employee's ability to use a respirator must accompany the medical evaluation. The recommendation shall provide only the following information.

A. The employee's ability to use a respirator or limitations of use

B. The need, if any, for follow-up medical evaluations

C. A statement that Mercy Clinic has provided the employee a copy of the written recommendation

1.10 Additional Medical Evaluations

1.10.1 Environmental Management shall provide additional medical evaluations when one of the following exists:

A. An employee reports medical signs or symptoms that will affect his or her ability to wear a respirator

B. Mercy Clinic, a supervisor or the respirator program administrator informs the management of Environmental Management that an employee requires re-evaluation

C. Information from this program, including observations made during fit testing, or program evaluation indicates a need for re-evaluation

D. A change occurs in workplace conditions (e.g., physical work effort, protective clothing, or temperature) that may result in a substantial increase of the physiological burden of an employee

1.11 Fit Testing

1.11.1 All employees required to wear a tight-fitting respirator shall be fit tested with the same make, model, style and size of respirator that will be used

1.11.2 All fit tests shall be of the quantitative type according to the test protocols outlined in 29 CFR 1910.134 Appendix A (Mandatory)

1.11.3 All employees shall be fit tested prior to initial use of respirator, whenever there is a change in make, model, style, size, or work status and annually thereafter. All employees which are asbestos-certified workers/supervisors shall be fit tested biannually.

1.11.4 Additional fit testing shall be required if the employee reports a problem, or if the employer, a supervisor or the program administrator makes visual observation of changes in the employee's physical condition that could affect respirator fit. The following conditions constitute additional testing, but are not conclusive:

A. Facial scarring

B. Dental changes

C. Cosmetic surgery

D. Obvious change in body weight

1.11.5 If, after passing a fit test, the employee notifies management or the program administrator that the fit of the respirator is unacceptable, the employee shall be given a reasonable opportunity to select a different respirator facepiece and be re-tested

1.11.6 This additional fit test shall be administered using the same protocols as described in 1.11.2 of this program

1.11.7 Any employee who fails to pass a fit test is prohibited from performing any work function requiring the use of a respirator

1.11.8 A fit test record shall be utilized to document make, model, style and size of respirator employee was tested in, the type of test and the results of that test

1.12 Use of Respirators

Environmental Management, in developing this program, has established policies and procedures to reduce the potential of injury or death due to improper use of respirators. The following elements are mandated for all employees who are required to use respirators:

1.12.1 Facepiece Seal Protection

A. Facial hair in the form of beards, sideburns, or long mustaches is strictly prohibited if it interferes with mask to face seal or valve function

B. Any corrective eyewear or other personal protective equipment that interferes with the seal of the facepiece is prohibited

C. For all tight fitting respirators, the employee must perform both a negative and positive pressure check as outlined in 29 CFR 1910.134 Appendix B-1 User Seal Check Procedures (Mandatory)

1.12.2 Continuing Respirator Effectiveness

Management shall maintain continuous surveillance in all work areas to identify changes in work conditions and/or conditions that would pose undue employee exposure or stress, which could affect respirator effectiveness. It is the responsibility of Environmental Management to continually re-evaluate respirator effectiveness in the workplace and to ensure that employees leave the respirator use area if any of the following conditions exist:

A. Washing of faces or respirator facepieces as necessary to prevent eye or skin irritation associated with respirator use

B. Vapor or gas breakthrough, changes in breathing resistance, or leakage of the facepiece

C. To replace the respirator, filter, cartridge, or canister elements

Note: Repairs or replacement of respirator must be performed before re-entry into work area.

1.12.3 Procedures for IDLH atmospheres

Environmental Management shall ensure that the following procedures are utilized when workers are required to perform tasks in an IDLH atmosphere:

A. One employee, or when needed, more than one employee is located outside the IDLH atmosphere

B. Visual, voice or signal line communication is maintained between the employee(s) in the IDLH atmosphere and the employee(s) located outside the IDLH area

C. The employee(s) located outside the IDLH atmosphere is/are trained and equipped to provide effective emergency rescue

D. The employer or designee is notified before the employee(s) located outside the IDLH atmosphere enter the IDLH atmosphere to provide emergency rescue

E. The employer or designee authorized to do so by the employer, once notified, provides necessary assistance appropriate to the situation

F. Employee(s) located outside the IDLH atmospheres are equipped with:

(1) Pressure demand or other positive pressure SCBA's, or a pressure demand or other positive pressure supplied-air respirator (SAR) with auxiliary SCBA

(2) Appropriate retrieval equipment for removing employee(s) who enter(s) the IDLH area where retrieval equipment would contribute to the rescue of the employee(s) and would not increase the overall risk resulting from entry

(3) Equivalent means for rescue where retrieval equipment is not required

1.13 Maintenance and Care of Respirators

1.13.1 Cleaning and disinfecting

All employees shall be provided a respirator, which is clean, sanitary and in good working order. The procedures for employee cleaning and disinfecting of respirators can be found in Appendix C of this program. Additional procedures are as follows:

A. Respirators issued for the exclusive use of an employee shall be cleaned and disinfected as often as necessary to be maintained in a sanitary condition

B. Respirators issued to more than one employee shall be cleaned and disinfected before being worn by different individuals

C. Respirators maintained for emergency use shall be cleaned and disinfected after each use

D. Respirators used in fit testing and training shall be cleaned and disinfected after each use

E. Respirators shall be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they shall be packed or stored to prevent deformation of the facepiece and exhalation valve

1.13.2 Inspection of respirators shall be performed according to the following guidelines:

A. All respirators used in routine situations shall be inspected before each use and during cleaning

B. All respirators maintained for use in emergency situations shall be inspected at least monthly and in accordance with manufacturer's recommendations, and shall be checked for proper function before and after each use

C. Emergency escape-only respirators shall be inspected before carried into the workplace for use

D. Inspections shall include a check of respirator function, tightness of connections, and condition of all components (e.g., facepiece, straps, valves, canisters or filters)

E. Elastomeric components should be checked for pliability and for deterioration

1.13.3 In addition to the above-mentioned inspections self contained breathing apparatus (SCBA's) shall be inspected monthly

1.13.4 Air and oxygen cylinders shall be maintained in a fully charged state and shall be recharged when the pressure falls to 90% of the manufacturer's recommended pressure level. A check to insure proper function of the regulator and emergency warning device shall be performed.

1.13.5 For all respirators maintained for emergency use, the inspection procedure must include the date of inspection, signature of inspector, the findings, required repairs (if applicable), and the use of a unique serial number to identify respirator

1.13.6 The above inspection information shall be documented by attaching a permanent tag to the storage container or case, and also in a logbook or database

1.13.7 Any defects found during the inspection shall be repaired immediately and immediately be taken out of service if the respirator can not be fixed.

1.13.8 A certified technician using NIOSH approved replacement parts shall make all repairs

1.14 Breathing Air Quality and Use

1.14.1 Environmental Management shall provide Grade-D breathing air of high quality and purity in accordance with ANSI/Compressed Gas Association Commodity Specifications for Air G-7.1-1989, to include the following:

A. Oxygen content of 19.5% to 23.5%

B. Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less

C. Carbon monoxide content of 10 ppm or less

D. Carbon dioxide content of 1,000 ppm or less

E. Lack of noticeable odor

1.14.1 Cylinders shall be tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 & 178)

1.14.2 Cylinders of purchased breathing air shall have a certificate of analysis from the supplier that the air meets the requirements for (Grade-D) breathing air.

1.14.3 Compressors used to supply air to respirators or to cascade systems on-site shall be constructed and situated so as to:

A. Prevent entry of contaminated air into the air-supply system

B. Minimize moisture content to ensure that the dew point at 1 atmosphere is 10 degrees F below the ambient temperature

C. Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Replacement of said beds and filters shall be performed according to manufacturer's recommendations

D. Have a tag on the compressor that communicates the most recent change date of beds or filters and the employee authorized to perform the change

E. Non-oil-lubricated compressors shall have less than 10 ppm carbon monoxide (CO)

F. Oil-lubricated compressors shall have a high-temperature or carbon monoxide alarm, or both to monitor CO levels

G. All breathing air couplings shall be of a design that is incompatible with non-respirable air or other gas systems

H. All breathing gas cylinders shall be properly marked in accordance with NIOSH respirator certification

1.15 Identification of Filters and Cartridges

Environmental Management shall insure that all cartridges and filters used in the workplace are properly labeled and color-coded with the NIOSH approval label and that the label is not removed and remains legible.

1.16 Training Information

Environmental Management shall provide effective training to those employees required to use respirators. The training will be completed initially and shall be comprehensive, understandable, and recur annually, and more often if necessary. The training program shall ensure that each employee demonstrates knowledge in the following areas:

A. Why the respirator is necessary and how improper fit, usage, or maintenance can compromise respirator effectiveness

B. What are the limitations and capabilities of the respirator

C. Proper use of the respirator in emergency situations and during respirator malfunction

D. How to inspect, don and doff, use, and perform seal checks

E. Procedures for maintenance and storage

F. Recognition of medical signs and symptoms that could limit or prevent respirator effectiveness

1.16.1 Training shall be conducted in a manner that is understandable to the employee

1.16.2 Training shall be provided before employee is required to use respirator

1.16.3 All employees shall receive training regardless of prior training from other sources

1.16.4 Re-training shall be repeated annually, and when the following situations occur:

A. Changes in workplace conditions or the type of respirator render previous training obsolete

B. Inadequacies in the employee's knowledge or use of the respirator indicates that the employee has not retained the requisite understanding or skill

C. Any situation that would indicate that re-training or additional training would ensure safe respirator use

1.17 Program Evaluation

Environmental Management shall continually evaluate this program to insure the highest level of safety to those employees who wear respiratory protection.

1.17.1 Evaluations of the workplace shall be performed as necessary to insure that the provisions of this program are being properly implemented and that those provisions continue to be effective

1.17.2 All employees shall be consulted to assess program effectiveness and to identify any problems associated with respirator use. Identified problems shall be addressed, and corrected as soon as is practical. While not conclusive, the following factors shall be part of this assessment process.

A. Respirator fit

B. Respirator selection based on atmospheric hazards

C. Respirator selection based on other workplace conditions

D. Respirator maintenance

1.18 Recordkeeping

Environmental Management has established both hardcopy and electronic databases to retain written information regarding medical evaluations, fit testing, and the respirator program. This recordkeeping will assist to facilitate the sharing of information to employees, to audit the effectiveness of the program and to provide a record of compliance to OSHA or other regulatory agencies.

1.18.1 Records of medical evaluations shall be retained in accordance with 29 CFR 1910.1020

1.18.2 A record of employee fit testing shall be established and must include the following elements:

A. Name or identification of employee

B. Type of fit test performed

C. Specific make, model, style, and size of respirator tested

D. Date of test

E. A pass/fail for qualitative testing or the fit factor and chart strip recording or other recording of the test results for quantitative testing

F. All fit test records shall be retained for respirator users until the next fit test is administered

G. A copy of this program shall be retained in the company files

H. All written material associated with this program shall be made available to affected employees

Appendix A

Fit Testing Procedure

Appendix B

User Seal Check Procedures

Appendix C

Respirator Cleaning Procedures

Appendix D
Medical Questionnaire

Appendix E

Respiratory Protection Standard 1910.134

Volume 6

Rigging & Material Handling

Section 23 A

1.1 Purpose

The purpose of this section is to ensure that all employees understand the significance of proper inspection, maintenance, storage and when necessary prompt removal of damaged rigging devices prior to use. It is the intent of Environmental Management to provide a hazard free workplace through the development of safety plans, sop's, training and management/employee participation to achieve this objective.

1.2 Scope

This section covers all facility and field activities and all sub contractors working with Environmental Management. On many projects employees will not have direct control of material rigging or moving of said material during work activities. Under these circumstances all employees should be extremely vigilant of their personal safety.

1.3 General Requirements

1.3.1 Rigging equipment for material handling shall be inspected prior to use on each shift and as necessary during its use to ensure that it is safe. Defective rigging equipment shall be removed from service.

1.3.2 Rigging equipment shall not be loaded in excess of its recommended safe working load. See 29 CFR 1926.251, 252.

1.3.3 Rigging equipment when not in use shall be removed from the immediate work area so as not to present a hazard to employees.

1.3.4 Tag lines shall be utilized unless their use creates an unsafe condition.

1.3.5 Hooks on overhaul ball assemblies, lower load blocks or other attachment assemblies shall be of a type that can be closed and locked, eliminating the hook throat opening. Alternatively, an alloy anchor type shackle with a bolt, nut and retaining pin may be used.

1.3.6 All employees shall be kept clear of loads about to be liftedand of suspended loads.

SANDBLASTING
(SILICA EXPOSURE)

Environmental
MANAGEMENT

2004

1.1 Purpose

Environmental Management personnel who have been trained and are responsible to perform, supervise/manage or work on a site where sandblasting is being performed shall be cognizant of the hazards created from sandblasting operations that utilize silica or other sands as a blasting agent. The purpose of this program is to communicate the hazards associated with the process to provide the maximum level of protection to effected employees. In accordance with 29 CFR 1926.21 (b) (3): All employees required to handle or use poisons, caustics or other hazardous substances shall be instructed regarding the safe handling and use, and be made aware of the potential hazards, personal hygiene, and personal protective measures required.

1.2 Background

Abrasive blasting involves a stream of abrasive particles projected at high velocities utilizing steam or air as the propellant. Because silica sand is the most commonly used abrasive agent it is most often referred to as "sandblasting". Common uses include surface etching, rust and paint removal, glass finishing, etc.

1.3 Toxicology

When workers inhale the crystalline form of silica, that which is used in sandblasting applications the tissues of the lung respond by developing fibrotic nodules or scarring around the silica particles. This condition is known as "Silicosis". As the nodules increase in size they interfere with the breathing process and may result in death of the exposed subject. Silicosis victims are also more susceptible to other diseases, such as tuberculosis. The sandblasting process itself increases the hazard of ordinary silica due to the fracturing of fine particles as an end product. Inhalation of such particles has been proven to produce a more severe lung reaction than the unfractured silica.
The current exposure limits as established by OSHA as a Permissible Exposure Limit (PEL) are 100ug/m^3 as an 8-hour time weighted average (TWA) {29 CFR 1910.1000}. The NIOSH Recommended Exposure Limit is 50 ug/m^3 as a TWA for up to 10 hours a day and 40 hours a week. Evidence also indicates that crystalline silica is a potential occupational carcinogen [NIOSH; IARC 1987; DHHS 1991].

1.4 Risk Exposure

Estimates indicate that more than 1 million workers in the United States are at risk of developing silicosis and that 100,000 of these workers are employed as sandblasters. Approximately 59,000 of the 1 million will eventually develop silicosis. The National Occupational Exposure Survey indicates that the construction industry employees the largest number of sandblasters, with the highest proportion in the special trades industries. Today acute silicosis is less common than in the 1930's due to the wide use of engineering controls and alternative abrasives that reduce exposures. The most common problem experienced today is the use of inadequate respiratory protection, or worst yet those individuals who use no protection.

1.5 Health Effects of Silica Exposure

Workers may develop one of three types of silicosis, depending upon exposure concentrations.

- **"Chronic Silicosis"** means a condition that usually occurs after 10 or more years of exposure to Crystalline Silica at relatively low concentrations.
- **"Accelerated Silicosis"** means a condition that results from exposure to high concentrations and develops in 5 to 10 years after initial exposure.
- **"Acute Silicosis"** refers to a condition that occurs where concentrations are the highest and can cause symptoms to develop within a few weeks to 4 or 5 years after initial exposure.

Silicosis (especially the acute form) is characterized by shortness of breath, fever and cyanosis (bluish skin); it may often be misdiagnosed as pulmonary edema (fluid in the lungs), pneumonia, or tuberculosis. Severe mycobacterial or fungal infections often complicate silicosis and may be fatal in many cases.

1.6 Engineering Controls

Environmental Management has chosen to provide engineering controls as the primary means of providing protection to employees who have the potential for exposure to crystalline silica during sandblasting operations at the Guthrie facility, client /customer facilities or mobile locations. The following controls shall be utilized when appropriate and practical.

- Blast cleaning machines and cabinets shall be used when possible to shield employees from respiratory hazards by isolating breathable silica dusts.
- Blast cleaning rooms when utilized shall contain the hazard and shall be equipped with a supplied air respirator (SAR) for any blaster working inside the room.
- When using portable sandblasting systems adequate ventilation shall be provided to insure visibility when in confined or enclosed areas. Curtains shall be installed to isolate activities from other employees, and SAR's must be used inside the containment area.

Additional engineering controls shall be designed, developed and incorporated into those job functions requiring special considerations.

1.7 Air Monitoring

Air monitoring shall be performed by a qualified person to determine ventilation and respiratory protection requirements to insure adequate worker protection. Air monitoring should be performed as needed to insure program effectiveness. Air samples should be collected and analyzed according to NIOSH Method # 7500 and 7602 [NIOSH 1984] or their equivalent.

1.8 Personal Hygiene

The following personal hygiene practices are mandatory Environmental Management protocols, and shall be performed during all sandblasting operations.

- Hands and face shall be thoroughly washed before eating, drinking, smoking, chewing, making cell phone calls or entering company offices, buildings or vehicles.
- It is forbidden to eat, drink, smoke, or use other tobacco products in the blasting area.
- All workers shall shower before leaving the worksite when applicable.
- All company vehicles or equipment shall be parked or staged in an area where contamination from silica dust is avoided.

1.9 Personal Protective Equipment (PPE)

- Workers shall not wear street clothes or work uniforms while sandblasting or in an area being sandblasted where exposure is possible without proper disposable outer wear. All outer garments shall be disposed of properly.
- Street clothes and/or uniforms shall be removed and clean garments worn in all company vehicles, office areas and customer facilities.

1.10 Respiratory Protection Program

Respirators shall be used as the last means of protection against the exposure of crystalline silica dusts. Engineering and administrative controls will be utilized prior to PPE usage. Effective source controls include substitution, automation, containment, exhaust ventilation, and good worker practices. When these methods are inadequate or infeasible to reduce the exposure levels below the NIOSH PEL, appropriate respiratory protection shall be incorporated in accordance with NIOSH recommendations and 29 CFR 1910.134. Appendix A contains a NIOSH Respirator Selection Matrix to determine appropriate respiratory protection levels. See the Environmental Management Respiratory Protection Program for additional information.

1.11 Medical Monitoring

To determine the initial health status, and to provide continuous protection in regard to a potential employee chemical exposure Environmental Management has established an extensive Medical Surveillance program. The program can be located in the Environmental Management Health and Safety Program. In addition to the requirements outlined in the program there exists additional requirements when employees are exposed or have the potential to be exposed to crystalline silica.
Any Environmental Management employee who may be exposed to silica dusts from sandblasting operations shall be required to undergo a complete medical examination before performing any work in an area of potential contamination. Examinations shall be performed every three years thereafter.

Note: The existing Environmental Management Program exceeds this requirement in most respects.
All employees receive baseline, annual and exposure physicals in accordance with 29 CFR 1910.120 (f) and DOT Driver requirements. The following additional requirements apply to those employees working with crystalline silica.

- A medical and occupational history to collect data on worker exposure to crystalline silica and signs and symptoms of respiratory disease.
- A chest X-ray classified according to the 1980 International Labour Office (ILO) Classification of Radiographs of the Pneumoconiosis [ILO 1981].
- Pulmonary Function testing (spirometry) *Note: this test is currently being performed annually.*
- An annual evaluation for tuberculosis [ATS/CDC 1986]

NIOSH encourages reporting all cases of silicosis to the state health departments and to OSHA or the MSHA. Reporting guidelines can be found in Appendix C.

1.12 Hazard Communication [Signs, Placards]

Hazard communication in the form of signage shall be utilized to inform workers of the presence of crystalline silica and shall specify appropriate personal protective equipment that must be worn in work area. A sample warning sign is located in Appendix B.

1.13 Training

All Environmental Management employees shall receive the following training prior to performing any task that would expose them to crystalline silica.

- Information regarding the potential adverse health effects of silica exposure.
- How to obtain, use and understand the information contained in the Material Safety Data Sheet (MSDS) for Silica, alternative abrasives, or other hazardous materials in accordance with 29 CFR 1926.59.
- Instruction regarding signage that identifies perimeters of work areas and required respirator use.
- Information regarding the safe handling, labeling, and storage of toxic materials.
- Instruction to emphasize the significance of utilizing engineering controls, administrative controls, i.e., personal hygiene to reduce the potential exposure to silica.
- Instruction in regard to the selection, care and usage of personal protective equipment (PPE), including respiratory equipment.

1.14 Summary

The intent of this or any other Health and Safety Program is to provide information that will assist the employee to perform his/or her work in a safer fashion. If there are areas of

concern or questions regarding a program please consult an immediate supervisor or the Health and Safety Officer. Your input is important and appreciated.

Appendix A
Respirator Selection Matrix

Appendix B
Hazard Communication

Appendix C
Reporting Guidelines

SCAFFOLDING
(USER ONLY)

Environmental
MANAGEMENT

2017

1.1 Purpose

Environmental Management performs numerous services for a diverse group of clients requiring employees to possess specialized knowledge and a wide variety of skills. On rare occasions work activities require the use of scaffolds. Although scaffold usage is a relatively rare occurrence, it has been included in the Environmental Management Health and Safety Program to provide employees with the information necessary to perform those tasks safely. This program should be utilized in conjunction with the Fall Protection Program located in the Environmental Management Health and Safety Plan.

1.2 Administrative Duties

The Environmental Management Safety Officer is responsible for developing and maintaining the program, and is responsible for ensuring that those effected employees have access and understand the information contained within the program.
If after reading this document and finding needed improvements any employee may contact their immediate supervisor or the safety officer to discuss necessary revision. Environmental Management encourages employee participation to improve the process. The primary objective of this and all other programs is to create a safe working environment for employees, contractors and other effected persons.

1.3 Training

All employees who are required to work on scaffolds must be trained by a qualified person in the subject matter required to recognize the hazards associated with the type of scaffold being used. The Environmental Management Training Officer is qualified to deliver basic safety training in the area of scaffold use, but is not considered a qualified scaffolding engineer. All engineering shall be performed by a qualified person having expertise in design, construction and maintenance of the system. Employees must understand the procedures to control or minimize the inherent hazards that exist when employees work on scaffolding. The following elements shall be included in the training program as a minimum:

- Electrical hazards
- Fall hazards
- Falling objects
- Maximum loading
- Erecting, maintaining, and disassembling
- Pertinent regulatory requirements
- Scaffold hazards

1.4 Retraining

Environmental Management employees who lack the necessary skills or understanding necessary to perform safety on scaffolds shall be retrained to ensure proficiency. Retraining is required in at least the following situations:

- Worksite changes that present new or different hazards
- Changes in equipment, scaffold design or style

- Fall protection and falling object protection
- Where inadequacies in an affected employee's work involving scaffolds indicate that the employee has not retained the requisite proficiency

1.5 Inspection

All scaffold inspections shall be performed by a competent person prior to employee use. Only Environmental Management employees who have received specialized training shall perform inspections beyond the normal safety inspection. Any modifications of a scaffolding system must be approved by the competent person in charge. Non-authorized employees shall not institute any changes in design, location or configuration unless authorized by the competent person.

1.6 Out-of-Service Tags

Tags, signs, placards and other forms of signage are a mandatory component of all Environmental Management health and safety programs when required. In accordance with 29 CFR 1910.145. (3), tags shall be used to communicate information regarding hazards that exist in the workplace. They shall be used to prevent accidental injury or illness to employees who are exposed to hazardous or potentially hazardous conditions, equipment or operations which are out of the ordinary, unexpected or not readily apparent. In the context of scaffold usage all employees shall obey any signage associated with scaffold use and shall not utilize any scaffolding that has been tagged out-of-service by a competent person. Environmental Management employees are authorized to tag-out any scaffolding that they determine to be unsuitable and/or unsafe. Examples of tags may be found in Appendix A

1.7 Summary

Most of the work performed by Environmental Management employees does not require the use of scaffolding. This program was included to address those rare occurrences when work is performed at elevated locations. The competent person is a critical element in an effective scaffold program. In most cases the customer has provided for erection and maintenance, and the competent person is a part of that function. When a project exhibits unusual conditions or increased complexity, Environmental Management shall ensure that engineering has been performed by a qualified person. The intent of this and other health and safety programs is to provide the highest levels of safety to those affected employees performing field activities.

Appendix A
Out of Service Tags

Short-Service Employee Program 2017

Applicable OSHA Standards: Supplemental and Support to OSHA Compliance

1.1 Purpose:

Environmental Management (hereinafter referred to as Company) recognizes that, despite pre-assignment safety and job orientations, newly hired employees do not have the same kind of recent work and safety experience with the Company as longer-term employees.

The *short-service employees* may be more vulnerable to accidents and injuries at work specifically because of their unfamiliarity with work situations and environments, as well as potential hazards and abnormal operating conditions. For that reason, short-service employees will be wearing a green hard hat with a white and red lettered sticker with the three letters SSE. The host facility will also be notified that a short service employee will be working on their site.

Additionally, employees who have short service with the Company are not as experienced with safe work procedures as personnel who have longer service with the Company, and first-hand safety and work experiences in their current job assignment.

This policy has been established to provide short-service employees with specific safety, supervisory, organizational and job site supplemental support during the first six months of employment with the company. This support includes a process of mentoring for these individuals to help them gain experience and familiarity in their work assignments and job site environment. Short Service Employees will not work alone, and will be monitored for compliance with all safety policies and procedures.

1.2 Scope:

This policy applies to all employees and subcontractors working within Company-controlled work sites.

1.3 Policy:

1.3.1 Definition and applicability

For purposes of this program, the term "short service" shall mean a length of service less than six months from the date of initial employment with the Company or 40 hour hazwoper certification.

Personnel who have previously been employed by the Company shall be subject to requirements of this program if they are separated from Environmental Management longer than 90 days; or if the supervisor re-hiring the individual and/or the Safety Coordinator elect to classify the re-hired individual as a *short-service employee* for purposes of additional safety training, operator qualification, and/or extended orientation about the work assignment or site-specific situations, tasks or for other work-related reasons.

In the event that a supervisor or manager is concerned about the safety progress, performance or results of a short-service employee at the time they pass the six-months employment period addressed by this program, the supervisor or manager is authorized, at his or her discretion, to place the individual employee under conditional, restricted or probationary work limitations that are separate and apart from the Short-Service Employee Program.

1.3.2 Organization Differentiation

For purposes of this program, the concept of organization differentiation will mean that records are made which allow the Company to maintain and track information regarding each employee's term of employment so that short-service employees can be readily identified for implementation of this program.

This includes tracking methods that identify when each individual's length of employment goes beyond six months and their status changes under this program, and that person is no longer classified as a short-service employee

1.3.3 Mentoring

As part of this program, the Company will designate one or more individuals to serve as mentors to short-service employees. Under this program, the term "mentor" will mean an experienced Company employee who is well regarded by the Company and specifically assigned by the company to be available to an individual short-service employee in a support rather than supervisory capacity.

In this role a mentor will be available and working closely with that employee to answer questions, offer guidance and advice, and generally provide the benefit of the mentor's experience, personal support and encouragement on a personal level.

In most situations, the mentor will be someone other than the short-service employee's assigned supervisor or manager. At the same time, work situations and crew assignments may involve a limited number of employees as particular work location, and the supervisor or manager in charge of the crew or workplace may service in the roll of mentor to one or more of these employees.

In every situation additional mentor assistance will be available to every short-service employee on request by contacting his supervisor or Safety Coordinator.

2.1 Mentor Minimum Requirements

Mentors must:

1. Be familiar with the short-service employee's job, the oversight responsibilities required, and the hazards associated with that job.

2. Be familiar with the site policies, procedures, and any specialized actions required in the work to be performed.

3. Exhibit the ability to recognize hazards and unsafe acts.

4. Be able and willing to challenge personnel in the workplace that do not comply with the site procedures, policies, or requirements and enforce the stop work authority.

5. Be an active participant in the behavior-based safety process.

Spill Prevent/Response

Introduction 1.1

Environmental Management, Inc. is a 24 hour spill response company that has an emergency response coordinator on stand by at all times incase of an emergency. If a spill occurs then an incident command system will be put into place. All that is required to mitigate a spill is located at the terminal. This includes but is not limited to;

Emergency Response Supplies and Equipment

I. **PERSONAL PROTECTION AND SAFETY**

A. Protective clothing
   1. Tyvek
      a) Standard coveralls
      b) Complete coverage
   2. Combination Tyvek
      a) Saranex
         (1) Coverall
            (2) Totally enclosed
      b) P.E. Coated
   3. Rain Suits
      a) PVC disposable
      b) PVC durable
   4. Acid suits
   5. Level A response suits
   6. Life jackets

B. Respiratory equipment
   1. Canister respirators
   2. Full-face respirators – twin cartridge
   3. Half-face respirators – twin cartridge
   4. Self Contained Breathing Apparatus (SCBA) – 28
   5. Cascade system
      a) 2 – five man kits

C. Eye protection and safety gear
   1. Safety glasses – dark & clear
   2. Goggles
   3. Face shields
   4. Portable eyewash

D. Foot protection and safety gear
   1. Rubber safety boots
   2. Rubber overshoes
   3. Hip waders
   4. Chest waders

E. Hand protection and safety gear
   1. Surgical gloves
   2. PVC 12" gloves
   3. Rubber 18" gloves
   4. Cotton liners
   5. Natural latex gloves
   6. Nitrile gloves
   7. Silver shields

F. Medical protection
   1. First-aid kits
   2. Trauma kits

G. Confined space entry equipment
   1. Personal safety tripod
   2. Electric ventilator
   3. Intrinsically safe lighting
   4. Harness

II. ANALYTICAL INSTRUMENTATION

A. Flash point analyzer
B. Gas detection meter
C. pH and ion probe meter
D. Conductivity meter
E. H_2S monitor
F. CO monitor
G. Portable pH meter
H. Composite depth sampler
I. TPH analyzer
J. Radiation monitor
K. Photoionization detector / Flame ionization detector combination unit
L. Photoionization detector unit
M. Hg monitor
N. Drager pump and tube sets
O. Acid / Base titration equipment
P. Density analysis equipment
Q. Phosphine monitor
R. HazCat strips
S. pH indicator strips

III. COMMUNICATION AND DOCUMENTATION

A. 24-hour telephone system
B. Cellular telephone in all response units
C. Cellular telephones

D. Voice com units / walkie talkies
E. Photographic equipment
   1. 35-mm cameras
   2. Digital camera
   3. Video camera
F. Nationwide pagers
G. Voice activated recorders
H. Laptop computers

IV. EQUIPMENT

A. Trucks
   1. Fourteen fully equipped response trucks
   2. Four-wheel drive winch truck
   3. Ten-ton winch truck / crew cab
   4. Thee rolloff trucks
      a) Forty-eight rolloff boxes
         - 20 yard
         - 25 yard
         - 30 yard
         - 40 yard
         - liquid tight
         - 40 yard compactor
      b) Four semi tractors (3 with wet kits)

B. Trailers
   1. Six fully equipped response trailers
   2. 28-foot self-contained immediate response trailer
   3. 18-foot enclosed response trailer
   4. Four, 14-foot enclosed response trailers
   5. Four, 12-foot enclosed response trailers
   6. Two, goose neck low-boy flatbed trailers
   7. Tandem low-boy enclosed trailer
   8. 20-foot tandem axle dump trailer
   9. Two 30-foot pindle hook trailers
   10. 20-foot pindle hook trailer
   11. Ben Lee double rolloff trailer
   12. Self-contained, 6000-gallon, stainless tanker with 250 gpm vacuum pump
   13. NC412, 6000-gallon stainless steel tanker
   14. 5000-gallon end dump tanker
   15. 3000-gallon bobtail tanker end dump tanker
   16. Enclosed vans
      a) 53-foot
      b) 48-foot with lift gate
   16. 59-yard end dump
   17. One, 53 foot float

C. Heavy equipment
   1. Three, track excavators
      a) One, ½ yard
      b) Two, 1 yard
   2. 4-wheel drive extended hoe with thumb and grapple
   3. Three, skid loaders, including:
      a) Buckets
      b) Forks
      c) Auger
      d) Single drum grappler
      e) Drum tilter
      f) Double drum grappler
      g) Hydraulic sweeper
   5. All terrain fork lift
   6. Standard fork lift
   7. 4-wheel drive tractor with soil aeration equipment
   8. 1000-gallon skid mounted vacuum tanker
   9. Portable drum crusher, self contained
   10. Response boats with motors.

D. Pumps, pressure washers, and vacuum units
   1. Diaphragm pumps (hand, air, and gasoline)
      a) One inch
      b) Two inch
      c) Three inch
      d) Four inch
   2. Acid pumps
   3. Chemical pumps
      a) One inch
      b) Two inch
   4. Three inch stainless steel pump (gasoline/electric)
   5. Trash pumps
      a) Two inch
      b) Three inch
   6. Two-inch submersible pumps
   7. One-inch electric pumps
   8. One and one-half inch hand pumps
   9. Barrel pumps
   10. Drum pumps
   11. Hepa vacuums
   12. Mercury vacuums
   13. Portable self-contained steam cleaning/pressure washer
   14. Portable 11-horsepower hot water pressure washer
   15. Portable pressure washers
      a) Electric
      b) Gasoline

E. Chlorine response equipment
   1. Chlorine A,B, and C kits
      a) Methyl chloride kits
      b) Bromide kits
   2. Chlorine K-cylinder coffin
   3. Two, small cylinder coffins (inside measurements 18" x 28")
   4. One, cylinder coffin (inside measurements 18" x 60")
   5. Four, stainless steel cylinder coffins (inside measurement 10" x 64")

F. Sampling equipment
   1. Core cutter
   2. Hand driven core samplers
   3. Trailer mounted, gas operated, subsurface sampler
   4. Teflon and PVC bailers
   5. Miscellaneous stainless steel and Teflon sampling equipment
   6. Sample jars

G. Tanks/basins
   1. Portable tanks
      a) 1500 gallon
      b) 2000 gallon
      c) 3000 gallon
      d) 5000 gallon
   2. 10,000 gallon storage tanks
   3. Portable mix basin

H. Power equipment
   1. Air compressors
      a) 18 CFM
      b) 25 CFM
      c) 164 CFM
   2. Generators
      a) One 4-kw
      b) Two 5-kw
      c) One 10 kW w/light tower
   3. Power tools (portable and electric)
   4. Chain saws
   5. Concrete saw
   6. Flood lights (12 and 110 volts)
   7. Flash lights
   8. Two-portable welders
   9. Plasma torch
   10. Two- oxy lance torches
   11. Portable cutting torch
   12. Portable propane heaters
   13. Salamander heaters

14. Air hammers
15. Abrasion saws

I. Treatment equipment
1. Skid mounted oil/water separator
2. Air strippers
3. Air spargers
4. Filtration units

J. Miscellaneous equipment
1. Large and small hand tools
2. Non-sparking hand tools (brass and plastic)
3. Barrel hand cutters
4. Barrel deheaders
5. Wheel barrows
6. Chains
7. Chain binders
8. Nylon securing ratchet straps
9. Come-a-longs
10. Tow cables
11. Fire extinguishers
12. Explosive carrier
13. Highway barricades
14. Manlift
15. Survey equipment
16. Grounding and bonding equipment
17. Mercury spill kits

V. SUPPLIES

A. Biosolve
B. Caution tape
C. Chlorine bleach
D. Citric acid
E. Containers
1. New and used steel closed top drums
   a) 15-gallon
   b) 30-gallon
   c) 55-gallon
2. New and used steel open top drums
   a) 55-gallon
3. Fiber open top containers
   a) 6-gallon
   b) 13-gallon
   c) 20-gallon
   d) 30-gallon

e) 55-gallon

4. Plastic open top containers
   a) 5-gallon
   b) 15-gallon
   c) 30-gallon
5. Liners
   a) Drum Liners
      - 55 gallon
      - 85 gallon
   b) Rolloff liners
6. Overpack drums
   a) Steel – new and used 85-gallon
   b) Poly – new and used 95-gallon
7. Plastic carboy
   a) 30-gallon
   b) 55-gallon new and used
8. Tote bags – one cubic yard

F. Kiln dust/fly ash – bagged and bulk
G. Oil dry
H. Oil pickup
I. Poly rope
J. Quick lime
K. Soda ash
L. Absorbent booms
   1. 5-inch by 10-feet
   2. 8-inch by 10-feet
M. Absorbent blankets
   1. 3/8-inch by 28-inch by 144-feet
   2. 3/8-inch by 19-inch by 150-feet
N. Absorbent sweep (17-inch by 100-feet)
O. Vermiculite
P. Visqueen
   1. 20-feet by 100-feet – 6 mil
   2. 40-feet by 100-feet – 6 mil

Each transport truck has spill kits on board in the event of an incident in transit.

Prevention 1.2

Spill prevention requires good housekeeping. All employees will inspect work areas and be sure they are in an orderly fashion before, during, and after work shifts. All employees will fix or report any unsafe work conditions to prevent any harm to people, property, or environment.

Training 1.3

Employees will have 40 hour HAZWOPER training and 30 days experience with Environmental Management at a minimum before they will be allowed to clean up spills. They will know where the appropriate areas for storage at the terminal for hazardous and non-hazardous materials. All employees will be trained how to use any and all equipment that is required for the spill response.

Communications 1.4

The terminal is equipped with an intercom system and a paging system with covers all the operational areas. Environmental management utilizes cellular telephones and a hand-held radio system that covers any location.

Storage and Containment 1.5

All materials will be stored in the proper location in the proper container. The containers will be compatible with the material to not allow for the chemical to permeate through the container. All containers will be secured and closed when not in use to prevent a release of the material.

TRENCHING/SHORING/EXCAVATION

Environmental
MANAGEMENT

2016

1.1 Purpose

It is the intent of Environmental Management to provide its employees the maximum levels of protection during all work activities. The objective of this program is to establish the minimum requirements for practices and procedures to protect those employees from cave-ins and or earth collapse when working in trenches or excavations. The minimum requirements have been established by OSHA and can be located in 29 CFR 1926 Subpart P. This program shall be applicable to by all Environmental Management employees whose job requires work in or around an excavation or open trench that is four (4) feet or greater in depth.

1.2 Scope and Application

This program sets forth the practices required for trenches or excavations with a depth of 4 feet or greater along any portion of its length that will be entered by an Environmental Management employee for any reason. All excavations, 4 feet deep or greater shall be appropriately benched, shored, or sloped according to the procedures and requirements established within this document. Excavations or trenches 20 feet or deeper must have a protective system designed by a registered professional engineer.

1.3 Responsibilities

The Health and Safety Officer and Field Supervisors have the primary responsibility for the implementation of the Trenching and Excavation Safety Program. The supervisor has the ultimate responsibility for the safety of the employees and general public that could be impacted by the excavation. This includes, but is not limited to the evaluation of the work to be performed, determination of the means of protection that will be utilized and adherence to the provisions of this policy as appropriate. The supervisor must insure on a daily basis, or more often as deemed necessary that site conditions are safe for employees. The supervisor or a member of the work group must be a "Competent Person" as defined by OSHA.

Employees have the primary responsibility for working in accordance with the provisions of this policy. No employees should enter an excavation meeting the scope of this policy until authorized by a competent person. The safety and training departments have the primary responsibility for providing training, trench protection systems, effective barricades and supporting the use of other protective measures deemed prudent and necessary by the competent person.

It shall be the responsibility of the Health and Safety Officer and/or the Field Supervisor to insure that the following elements are addressed before excavation operations begin:

* Conduct an on-site evaluation to monitor safe work practices and procedures.

* Assist with atmospheric testing and personal protective equipment selection.

* Identify training requirements for workers and the "Competent Person".

* Provide technical assistance as needed.

* Review and update the program at least annually, or as required.

1.4 Definitions

"Benching" means a method of protecting employees from cave-ins by excavating the sides of an excavation to form one or a series of horizontal levels or steps, usually with vertical or near-vertical surfaces between levels.

"Cave-in" means the separation of a mass of soil or rock material from the side of an excavation, or the loss of soil from under a trench shield or support system, and its sudden movement into the excavation, either by falling or sliding, in sufficient quantity so that it could entrap, bury, or otherwise injure and immobilize a person.

"Competent person" means one who is capable to identify existing and predictable hazards in the surroundings or working conditions that may affect employees and the general public, and who has authority to take prompt corrective measures to eliminate them. The Competent Person(s):

* Must be trained in and knowledgeable of excavation and trenching standard, and other programs that may apply (Hazard Communication, Confined Space, Respiratory Protection)

* Must be capable or recognizing hazardous conditions and must have authority to stop work and ensure that hazards are corrected.

* Performs and documents the "Daily Excavation Inspection" and knows when inspections should be performed

* Must assure that the location of underground installations or utilities have been properly located.

* Must identify and ensure the use of adequate protective systems, work methods, and personal protective equipment (PPE) on the excavation site

"Excavation" means any man-made cut, cavity, trench, or depression in an earth surface, formed by earth removal.

"Registered professional engineer (RPE)" means a person who is registered as a professional engineer.

"Shield (shield system)" means a structure that is able to withstand the forces imposed on it by a cave in and thereby protect employees with the structure. Shields can be a permanent structure or can be designed to be portable and moved along as work progresses. Also known as trench boxes or trench shields.

"Shoring (shoring system)" means a structure such as a metal hydraulic, mechanical, or timber shoring system that supports the sides of an excavation and which is designed to prevent cave-ins.

"Sloping (sloping system)" means a method of protecting employees from cave-ins by excavating to form sides of an excavation that are inclined away from the excavation so as to prevent cave-ins. The angle of incline varies with differences in such factors as the soil type, environmental exposure conditions, and application of surcharge loads.

"Soil Type A" means most stable: clay, silty clay, and hardpan (resists penetration). No soil is Type A is it is fissured, is subject to vibration of any type, has previously been disturbed, or has seeping water. As most soils in areas where work will be conducted at UF have been disturbed, no UF soils will be considered Type A.

"Soil Type B" means medium stability: silt, sandy loam, medium clay and unstable dry rock; previously disturbed soils unless otherwise classified as Type C.

"Soil Type C" means least stable: gravel, loamy sand, soft clay, submerged soil or dense, heavy unstable rock, and soil from which any water is seeping.

"Soil – Mixed Types (Layered Geological Strata)" means the soil must be classified on the basis of the soil classification of the weakest soil layer. Each layer may be classified individually if a more stable layer lies below a less stable layer, i.e. where a Type C soil rests on top of stable rock.

"Trench (trench excavation)" means a narrow excavation (in relation to its length) made below the surface of the ground. In general, the depth is greater than the width, but the width of a trench is not greater than 15 feet. If forms or other structures are installed or constructed in an excavation as to reduce the dimension measured from the forms or structure to the side of the excavation to 15 feet or less, the excavation is also considered to be a trench.

1.5 Procedures

An Environmental Management Dig Permit shall be issued for each excavation. The site information shall be documented on the Excavation Inspection Summary sheet (see Appendix A). Underground utilities must be located and marked before excavation begins. A competent person shall be identified by name on the dig permit for all excavations with a depth of four feet or greater at any portion that personnel may enter.

* The locations of sewers, telephone, fuel, electric, water lines, or any other underground installations that may be encountered during excavation work must be determined and marked prior to opening and excavation. The Project Manager shall make arrangements as necessary with the appropriate utility agency for the protection, removal, shutdown, or relocation of underground installations.

* If it is not possible to establish the exact location of these installations, the work may proceed with caution if detection equipment or other safe and acceptable means are used to locate the utility.

1.5.1 Protection of the public

Excavations must be isolated from public access by a substantial physical barrier. Barricades, lighting and posting shall be installed as appropriate prior to the start of excavation operations. All temporary excavations of this type shall be backfilled as soon as possible.

A. Guardrails, fences, or barricades should be installed around excavations adjacent to walkways, roads, paths or other traffic areas. Use of barricade tape alone is not considered a sufficient method of isolation when the excavation is unattended. Warning lights or other illumination shall be used as necessary for the safety of the public at night.

B. Wells, holes, pits, and similar excavations must be effectively barricaded or covered and posted.

C. Walkways or bridges used by the general public to cross excavations must be equipped with standard guardrails.

1.5.2 Surface encumbrances

All equipment, materials, supplies, buildings, roadways, trees, utility vaults, boulders, etc. that could present a hazard to employees working in the excavations must be removed or supported as necessary to protect employees.

1.5.3 Soil Classification

The competent person in charge of the excavation shall be responsible for determining the soil type. All previously disturbed soil is automatically considered Type B or C soil. Soil may be considered Type C by default and no additional tests are required. To classify soil as type B the competent person shall use a visual test coupled with one or more manual tests.

A. Visual test: Evaluate the conditions around the site including the soil adjacent to the site and the soil being excavated. Identify any signs of vibration. Check for crack-line openings along the failure zone, look for

existing utilities that indicate that the soil has been previously disturbed, and observe the open side of the excavation for indications of layered geologic structuring. Look for signs of bulging, boiling, or sloughing, as well as signs of water seepage from the sides or bottom of the excavation. The area adjacent to the excavation should be evaluated for foundations or other intrusions into the failure zone, and the evaluator should check the spoil distance from the edge of the excavation.

Any one of the following will cause soil to be classified as Type C

(1) Water seepage into excavation

(2) Vibration from road traffic or equipment

(3) Signs of bulging, boiling, or sloughing

(4) Crack lines along failure zone

B. Manual tests:

(1) Thumb penetration test: Attempt to press the thumb firmly into the soil in question. If the thumb penetrates no further than the length of the nail, it is probably Type B soil. If the thumb penetrates the full length of the thumb, it is Type C. It should be noted that the thumb penetration test is the least accurate testing method.

(2) Dry strength test: Take a sample of dry soil If it crumbles freely or with moderate pressure into individual grains it is considered granular (Type C). Dry soil that falls into clumps that subsequently break into smaller clumps (and the samller clumps can only be broken with difficulty) it is probably clay in combination with gravel, sand, or silt (Type B).

(3) Plasticity or Wet thread test: Take a moist sample of the soil. Mold it into a ball and then attempt to roll it into a thin thread approximately 1/8 inch in diameter by two inches in length. If the soil sample does not break when held by one end, it may be considered Type B.

A pocket penetrometer, shearvane, or torvane may also be used to determine the unconfined compression strength of soils.

1.5.4 Protective Systems

In excavations greater than 4 feet in depth a method to protect people entering the excavation from cave in must be employed. Acceptable protective methods include sloping, benching, shielding, and shoring.

1.6 Benching, Sloping, Shoring, and Shielding Requirements

Excavations under the base of the footing of a foundation or wall require a support system designed by a registered professional engineer. Sidewalks, pavement, utility vaults or other similar structures shall not be undermined unless a support system or another method of protection is provided to protect employees from their possible collapse. Sloping or benching are often the preferred methods of protection; however, shoring or shielding is used when the location or depth makes sloping to the allowable angle impractical.

1.6.1 Sloping

Maximum allowable slopes for excavations less than 20' based on soil type and angle to the horizontal are as follows:
Type B soil must have walls sloped to a maximum angle of 45-degrees (1:1 slope) from horizontal in all directions.
Type C soil must have walls sloped at a maximum angle of 34-degrees (1:1.5 slope) from horizontal in all directions.

1.6.2 Benching

In Type B soil, the vertical height of the benches must not exceed 4 feet. Benches in increments of 2 feet or less is preferred. The angle developed by the edge of the benches must not exceed the maximum allowable slope for that soil type (Type B soil 45-degrees). Benching is not permitted in Type C soil.

1.6.3 Shielding

Trench boxes or trench shields are intended to protect workers from cave-ins and similar incidents. The trench shield is lowered into the excavation and workers may then enter the protected area within the shield. Only trench shields designed or certified by a registered professional engineer may be used. The use is limited to those trenches for which the shield is certified (e.g. maximum depth and material). The manufacturer must approve any modifications to the shields. The excavated area between the outside of the trench box and the face of the trench should be as small as possible. The space between the trench box and the excavation side should be backfilled to prevent lateral movement of the box. Trench boxes may be used in combination with sloping and benching. The box must extend at least 18 inches above the surrounding area if there is sloping toward the excavation. This can be accomplished by providing a benched area adjacent to the box. Shields may be placed two feet above the bottom of an excavation, provided they are calculated to support the full depth of the excavation and there is no caving under or behind the shield. Workers must enter and leave the shielded area in a protected manner,

such as by a ladder or ramp. Workers may not remain in the shielded area while it is being moved.

1.6.4 Shoring

Timber shoring SHALL NOT be used by Environmental Management personnel. Hydraulic shoring is permitted, as workers do not have to enter the trench to install it. It is gauge-regulated and ensures even distribution of pressure along the trench line and can be adapted to various trench depths and widths. All shoring shall be installed from the top down and removed from the bottom up. Hydraulic shoring shall be checked at least once per shift for leaking hoses and/or cylinders, broken connections, cracked nipples, bent bases, and any other damaged or defective parts. The top cylinder of hydraulic shoring shall be no more than 18 inches below the top of the excavation. The bottom of the cylinder shall be no higher than four feet from the bottom of the excavation. (Two feet of trench wall may be exposed beneath the bottom of the rail or plywood sheeting, if used.) Three vertical shores, evenly spaced, must be used to form a system. Wales are installed no more than two feet from the top, no more than four feet from the bottom, and no more than four feet apart, vertically.

1.7 Inspections

Frequent inspection of the excavation and surrounding area by the Competent Person is critical to ensure the safety of the workers involved in work within the trench. The Competent Person must conduct inspections of the entire excavation site:

* Daily and before the start of each shift

* As dictated by the work being done in the trench

* After every rain storm

* When fissures, tension cracks, sloughing, undercutting, water seepage, bulging at the bottom, or other similar conditions occur

1.7.1 Temporary spoil

Shall be placed no closer than 2 feet from the surface edge of the excavation.
The distance is measured from the nearest base of the spoil to the cut. This distance should not be measured from the crown of the spoil deposit. This distance requirement ensures that loose rock or soil from the temporary spoil will not fall on employees in the trench. The spoil should be placed so that it channels rainwater and other run-off water away from the excavation. Spoil should be placed so that it cannot accidentally run, slide, or fall back into the excavation.

1.7.2 Surface Crossing of Trenches

Surface crossing of trenches should not be made unless absolutely necessary. However, if necessary, they are only permitted under the following conditions:

A. Vehicle crossings must be designed by and installed under the supervision of a registered professional engineer.

B. Walkways or bridges must have a minimum clear width of 20 inches, be fitted with standard rails, and extend a minimum of 24 inches past the surface edge of the trench.

1.7.3 Ingress and Egress

Trenches 4 feet or more in depth shall be provided with ladders or other fixed means of egress. Spacing must be such that a worker will not have to travel more than 25 feet to the nearest means of egress. Ladders must be secured and extend a minimum of 36 inches above the landing. Metal ladders should be used with caution, particularly when electric utilities are present.

1.7.4 Exposure to Vehicles

Employees exposed to vehicular traffic shall be provided with and required to wear reflective vests or other suitable garments marked with or made of reflectorized or high-visibility materials. Trained flag persons, signs, signals, and barricades shall be used when necessary.

1.7.5 Exposure to Falling Loads

Employees are not allowed in the excavation while heavy equipment is digging. Employees must not work under loads being lifted or moved by heavy equipment used for digging or lifting. Employees are required to stand away from equipment that is being loaded or unloaded to avoid being struck by falling materials or spillage.

1.7.6 Hazardous Atmospheres and Confined Spaces – Testing for Atmospheric Contaminants

If there is any possibility that the trench or excavation could contain a hazardous atmosphere, atmospheric testing must be conducted prior to entry. Conditions that might warrant atmospheric testing would be if the excavation was made in a landfill area or if the excavation is adjacent to sources of contamination (e.g. sewage or fuel leaks). Testing should be conducted before employees enter the trench and should be done regularly to ensure that the trench remains safe. The frequency of testing should be increased if equipment is operating in the trench that could produce airborne contaminants. Employees required to wear respiratory protection must be trained and fit-tested according to the Environmental Management respiratory protection program.

Trenches and excavations with hazardous concentrations of airborne contaminants or oxygen deficient atmospheres qualify as confined spaces. When this occurs, compliance with the Confined Space Program is also required.

Employees shall not be permitted to work in hazardous and/or toxic atmospheres. These include atmospheres with:

(1) less than 19.5% oxygen

(2) a combustible gas concentration greater than 20% of the lower flammable limit

(3) concentrations of hazardous substance that exceed those specified in the Threshold Limit Values for airborne contaminants established by the ACGIH.

1.7.7 Standing Water and Water Accumulation

Workers must not enter or work in excavations with standing water or in which water is accumulating unless adequate protection is provided. Protective methods for these circumstances must include:

(1) Use of special support or shield systems approved by a registered professional engineer

(2) Water removal equipment used and monitored by a competent person

(3) Safety harnesses and lifelines used in conformance with 29 CFR 1926.104

During rainstorms employees must exit the trench. The excavation must be carefully inspected by a competent person after each rain and before employees are permitted to re-enter the trench. Protective measures such as diversion ditches and dikes should be used to limit surface runoff water from entering the excavation.

Appendix A

Excavation Inspection Summary

Appendix B

29 CFR 1926.650

Volume 7

HOT WORK
WELDING AND CUTTING

Environmental
MANAGEMENT

2017

1.1 Purpose

The following Welding & Cutting Procedures establish uniform guidelines to be utilized whenever an employee works with welding and cutting equipment at Environmental Management. The procedures outlined here establish uniform requirements designed to ensure that welding and cutting safety training, operation, and maintenance practices are communicated to and understood by all authorized employees. These requirements are designed to ensure that procedures are in place to safeguard the health and safety of all affected employees.

It is the intent of Environmental Management to comply with the regulations in 29 CFR 1910.250 through .255. We also comply with the following applicable regulations and standards:

Standard or Regulation:	**Name:**
ANSI Z48.1-1954	*American National Standard Method for Marking Portable Compressed Gas Containers to Identify the Material Contained*
ANSI Z49.1-1967	*Safety in Welding and Cutting*
ANSI B57.1-1965	*American National Standard Compressed Gas Cylinder Valve Outlet and Inlet Connections*
ANSI Z87.1-1968	*American National Standard Practice for Occupational and Educational Eye and Face Protection*
API Std. PSD No. 2201-1963	*Welding or Hot Tapping on Equipment Containing Flammables*
AWS A6.1-1966	*Recommended Safe Practices for Gas-Shielded Arc Welding*
NEMA EW-1-1962	*Requirements for Electric Arc-Welding Apparatus*
NFPA Standard 51B-1962	*Standard for Fire Prevention in Use of Cutting and Welding Processes*
29 CFR 1910.132	*Personal Protective Equipment—General Requirements*
29 CFR 1910, Subpart S	*Electrical*
29 CFR 1910.1000	Air Contaminants

42 CFR 84	*Approval of Respiratory Protective Devices*
49 CFR 171-179	*Hazardous Materials Regulations*

1.2 Administrative Duties

The Health and Safety Officer is responsible for developing and maintaining the written Welding & Cutting Procedures program. The written program can be located on the Safety & Health Database and in the Maintenance shop office.

1.3 Welding and Cutting Equipment

The following welding and cutting equipment is currently in inventory at Environmental Management:

Make, model, and serial number:	Type:	Quantity:	Purpose and location:
Welder SN: P342575		1	Shop
Welder Miller S-22A		1	Shop
Welder 103 Airco P342785		1	Shop
Welder 105 P&H B32317U1		1	Shop
Welder – Wire Feed 104 Miller KD421129		1	Shop
Arc Welder 1750 Miller Thunderbolt JJ351731		1	Shop
Arc Welder 1777 A.O. Smith 226-6122-1		1	Shop
Arc Welder-Mobile 1752 Lincoln A1070564		1	Shop
Arc Welder/Gen 115/230V, Roll around 1938 Lincoln U1990702813		1	Shop
Lincoln AC-225 amps 220 volts		1	Shop
Oxygen Regulator Victor		1	Shop
Oxylance		1	Shop
Plasma Cutter 84 Lincoln U193070629		1	Shop
Plasma Cutter Hypertherm 45		1	Shop
Shop Welder #2 81 Lincoln AC829193		1	Shop
Torch #1, Dolly Mounted 85 Victor-Journeyman R6826922		1	Shop

Torch #2 Harris-Claorific	1	Shop
Torch #3 86 Victor-Journeyman T-173611	1	Shop

1.4 Training

It is the policy of Environmental Management to permit only trained and authorized personnel to operate welding and cutting equipment. The Terminal Manager or Maintenance Manager will identify all new employees who are trained and/or authorized personnel.

The Maintenance Supervisor will conduct initial training and evaluation of new employees. He has the necessary knowledge, training, and experience to train new welding and cutting equipment operators. Credentials can be located in the employee training file.

The following initial training shall include the operational hazards of our welding and cutting operations at the Guthrie facility and during field operations.

*Hazards associated with the particular make and model of the welding and cutting equipment

* Hazards of the workplace

* General hazards that apply to the operation of all or most welding and cutting equipment

* Chemical hazards that may be associated with some cutting and welding applications

Each potential welder or cutter who has received training in any of the elements of our training program for the types of equipment which that employee will be authorized to operate and for the type of workplace in which the welding and cutting equipment will be operated need not be retrained in those elements before initial assignment in our workplace if Environmental Management has written documentation of the training and if the employee is evaluated to be competent.

1.4.1. Training Certification

After an employee has completed the training program, the instructor will determine whether the potential welder or cutter can safely perform the job. At this point, the trainee will take a performance test or practical exercise through which the instructor will decide if the training has been adequate. All welding and cutting trainees are tested on the equipment they will be operating.

The Records Department is responsible for keeping records certifying that each employee who has successfully completed training and testing. Each certificate includes the name of the employee, the date(s) of the training, and the signature of the person who performed the training and evaluation.

1.4.2 Performance Evaluation

Each certified welder or cutter is evaluated to verify that the welder or cutter has retained and

uses the knowledge and skills needed to operate safely. This evaluation is done by the Maintenance Manager. If the evaluation shows that the welder or cutter is lacking the appropriate skills and knowledge, the welder or cutter is retrained before being allowed to perform critical operations. Additional retraining may be needed when a welder or cutter has an accident, near miss or an unsafe operating procedure is identified.

1.4.3 Current Welders and Cutters

Under no circumstances may an employee operate welding or cutting equipment until he/she has successfully completed this company's welding and cutting training program. This includes all new welders and cutters regardless of claimed previous experience.

The following table lists employees who are currently authorized welders and cutters at this company:

All shop personnel.

Department or work area:	Employee name/title:	Equipment make and model:
Shop/Maintenance Dept.	Terminal Manager	All including plasma cutter
Shop/Maintenance Dept.	Maintenance Supervisor, Field Technicians	All including plasma cutter

All employees have a general obligation to work safely with and around welding and cutting operations.

1.5 Operating Procedures

Welding and cutting can create certain hazards that only safe work practices can prevent. That's why we have created a set of operating procedures. Our operating procedures are outlined below.

1.5.1 Compressed Gas Cylinders

A. All compressed gas cylinders shall be constructed and maintained in accordance with the regulations of the U.S. DOT, 49 CFR Parts 711-179 and 29 CFR 1910.253 (b) (1).

B. All cylinders shall be clearly marked to identify the gas content.

C. All cylinders shall be stored away from heat sources with the valve protection cap in place and properly anchored so cylinders will not be knocked over. Oxygen cylinders shall be stored upright and 20' away from any flammable gases or petroleum products

D. Specialty gases require additional requirements; see below.

1.5.2 Gas Welding and Cutting

All gas welding and cutting operations shall conform to the requirements established in 29 CFR 1910.252. This section applies to all employees who perform gas welding, cutting and maintenance on equipment. Specific procedures can be located within this document.

1.5.3 Arc Welding and Cutting

All arc welding and cutting operations shall conform to the requirements established in 29 CFR 1910. 254. This section applies to all welders, cutters and those individuals who perform maintenance on arc welding and/or cutting equipment. Specific procedures can be located within this document. Additionally, all workers must be acquainted with the requirements of both 1910.254 and 1910.252 and the American Welding Societies Recommended Safe Practices for Gas-Shielded Arc Welding A6.1-1966 and is incorporated by reference as specified in Sec.1910.6 of the OSHA standard.

1.5.4 Fire Prevention

Fire prevention and protection precautions shall conform to 29 CFR 1910.252 (a) (1). There are extensive requirements within the standard that apply to workers, supervisors, management and contractors in the area of fire prevention during welding and cutting operations. NFPA Standard 51B, 1962 has been incorporated by reference into this standard.

1.6 Fire Hazards

There are certain fire hazards that exist when welding or cutting operations are to be performed in and around flammable or combustible materials. Good housekeeping can reduce or eliminate the potential for fire in the workplace. When practical welding or cutting operations should be performed away from ignitable materials. All flammable gases, liquids and solids should be removed to a safe distance before operations begin. If the object to be welded or cut cannot be moved a guard should be utilized to confine heat, sparks, and slag and to protect the immovable objects. 29 CFR 1910.252 (a) (1) (i)-(iii)provides additional information on fire hazards. If the elements stated cannot be fulfilled, welding and cutting operations may not be performed.

1.6.1 Fire Watchers

The need for fire watch is an important element to prevent fires due to welding and cutting operations. All employees shall conform to 29 CFR 1910.252 (a) (2) (iii) (A). Environmental Management requires a fire watch on all activities both at the Guthrie facility and during field activities. Fire extinguishers shall be available for all activities and the fire watch must extend 30 minutes after all welding and cutting had ended. All employees have been trained in the use of portable fire extinguishers, proper PPE use, alarm activation, basic fire physics and CPR / Basic First Aid. Supervisors shall insure the availability of adequate first aid supplies for accidents or injuries that might occur. Employees must report all accidents, injuries or illnesses as soon as practical on the Environmental Management report form.

1.6.2 Ventilation

Appropriate ventilation shall be utilized during all welding or cutting activities when

concentrations of airborne gases, vapors and fumes are below the PEL and can be removed using natural or forced ventilation. When concentrations warrant, proper respiratory protection shall be used. Ventilation in confined spaces shall conform to the requirements of 29 CFR 1910.252 (c) (4) (i).

1.6.3 Personal Protective Equipment

All required personal protective equipment; (PPE) shall be provided by Environmental Management to those individuals performing welding or cutting operations. Specific requirements regarding PPE can be found in 29 CFR 1910.252 (b) (2) (i)-(3). Additional requirements are also addressed in 1910.132 and in several ANSI Standards. As part of Environmental Management's overall safety program PPE selection and use is a critical element that must be utilized to insure worker safety.

First aid supplies are readily available both at the facility and during field activities and trained personnel are on-site at all times to administer basic first aid and CPR.

1.6.4 Confined Spaces

All employees that are authorized to enter a confined space have received training in Permit-Required Confined Space Entry and Lockout/Tagout procedures. Additional requirements are addressed in 29 CFR 1910.252 (a) (4) (i). The following considerations must be a part of the confined space entry permit when welding or cutting operations are performed in confined spaces:

A. Develop a "Hot Permit/Burn Permit"

B. Adequate ventilation or appropriate respiratory protection must be used

C. All gas valves must be closed when not in use and at the end of the work shift

D. All cylinders shall be secured

E. Electric sources shall be de-energized when not being used (lunch, breaks, etc.)

1.6.5 Flammable, Toxic, or Hazardous Materials

The level of contamination that may exist in a welding area is addressed by OSHA based on 3 factors.

1. Dimensions of space (with an emphasis on ceiling height)

2. Number of welders working in an area, and

3. The possible evolution of hazardous fumes, gases, or dust created.

ANSI Z49.1-1967 Safety in Welding and Cutting published by the American Welding Society should be consulted to determine hazards associated with certain materials. The OSHA standard identifies the following materials as being extremely toxic and dictates the use of appropriate respiratory protection when welding or cutting materials containing these materials.

A. Lead

B. Cadmium

C. Mercury

D. Beryllium

E. Paints

F. Exotic Compound Metals

1.7 Inspections

A number of inspections are required under the welding and cutting regulations. To make inspections efficient, we have compiled a list of inspection items to be checked before welding or cutting:

1.7.1 Inspection regulations for general industry

29 CFR 1910.252 General requirements--- (a)(2)(iv) Authorization. Before cutting or welding is permitted, the area shall be inspected by the individual responsible for authorizing cutting and welding operations. He shall designate precautions to be followed in granting authorization to proceed preferably in the form of a written permit. (HOT WORK PERMIT).

(b)(2)(i)(B) Goggles or other suitable eye protection shall be used during all gas welding or oxygen cutting operations. Spectacles without side shields, with suitable filter lenses are permitted for use during gas welding operations on light work, for torch brazing or for inspection.

(d)(1)(vii) X-ray inspection. The use of X-rays and radioactive isotopes for the inspection of welded pipeline joints shall be carried out in conformance with the American National Standard Safety Standard for Non-Medical X-ray and Sealed Gamma-Ray Sources, ANSI-Z54.1-1963, which is incorporated by reference as specified in 29 CFR 1910.6.

(d)(2)(ii) X-ray inspection. The use of X-rays and radioactive isotopes for the inspection of welded piping joints shall be in conformance with the American National Standard Safety Standards for Non-Medical X-ray and Sealed Gamma-Ray Sources, ANSI Z54.1-1963.

29 CFR 1910.253 Oxygen-fuel gas welding and cutting--- (e)(6)(iv) Union nuts and connections on regulators shall be inspected before use to detect faulty seats which may cause leakage of gas when the regulators are attached to the cylinder valves.

29 CFR 1910.255 Resistance welding---

(e) Maintenance. Periodic inspection shall be made by qualified maintenance personnel, and a certification record maintained (See inspection checklist Appendix A). The certification record

shall include the date of inspection, the signature of the person who performed the inspection and the serial number, or other identifier, for the equipment inspected. The operator shall be instructed to report any equipment defects to his supervisor and the use of the equipment shall be discontinued until safety repairs have been completed. Any deficiencies found in our welding and cutting equipment are repaired, or defective parts replaced, before continued use. However, no modifications or additions that affect the capacity or safe operation of the equipment may be made without the manufacturer's written approval. If such modifications or changes are made, the capacity, operation, and maintenance instruction plates, tags, or decals, must be changed accordingly. In no case may the original safety factor of the equipment be reduced.

While defective parts may be found, we prefer to invest time and effort into the proper upkeep of our equipment, which results in day-to-day reliability. Keeping up with the manufacturers recommended maintenance schedules, and completing the proper records, will also increase our welding and cutting equipment's longevity.

The Terminal Manager or Maintenance Manager complete(s) a receiving or delivery inspection whenever our company purchases welding and cutting equipment.

1.8 Signs and Labels

Our company posts signs as follows:

"Welding Area Do Not Enter"

"Restricted Area Do Not Enter"

Labels are used to communicate important information to employees involved in welding or cutting operations.

All welding or cutting gas cylinders are marked to reflect the gas content.

1.9 Recordkeeping

The Terminal Manager or Maintenance Manager is responsible for maintaining the following records:

A. Cylinder Hydrostat Testing

B. Equipment Maintenance

C. Authorized employees

These records are maintained in the maintenance shop office.

Appendix A

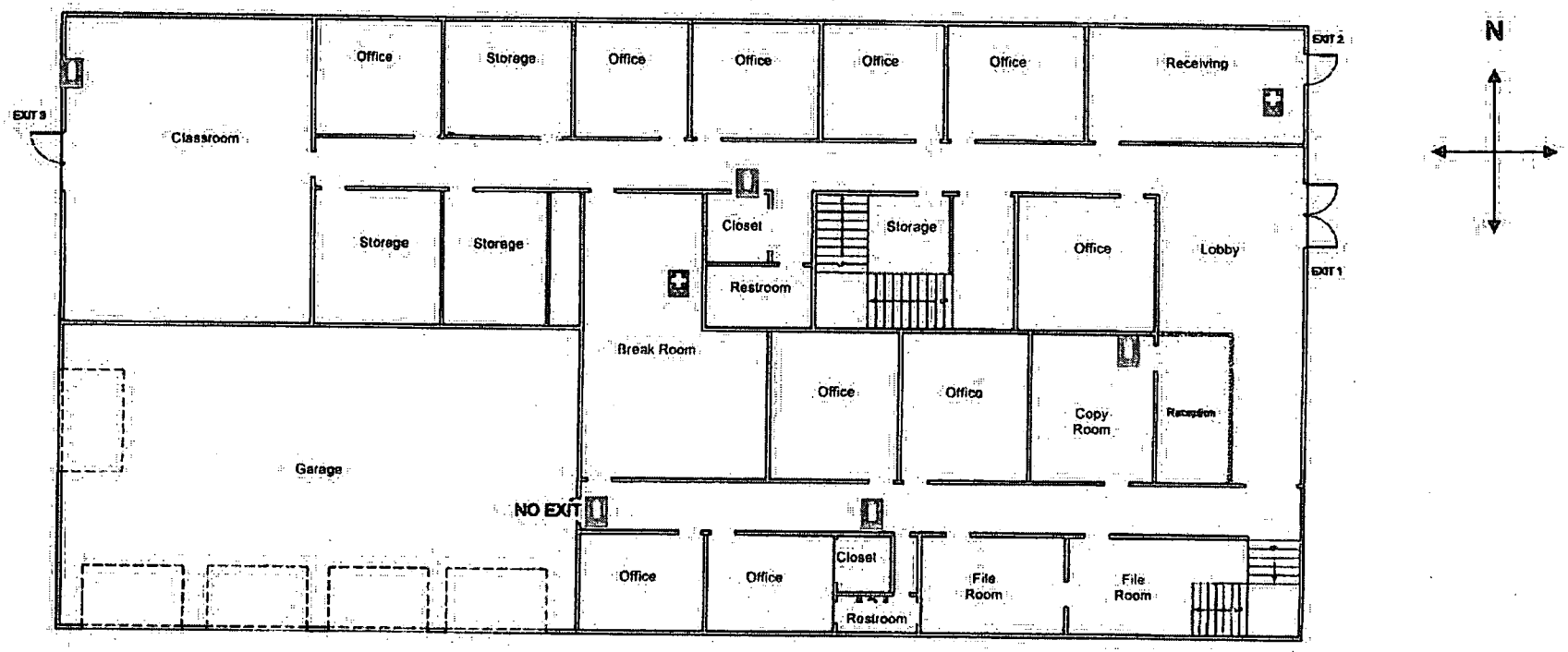
Sample Inspection Checklist for General Industry

Appendix B

The OSHA Standard Subpart Q, 29 CFR 1910.251-255

Safety Station
Location Maps

BUILDING #1: FIRST FLOOR

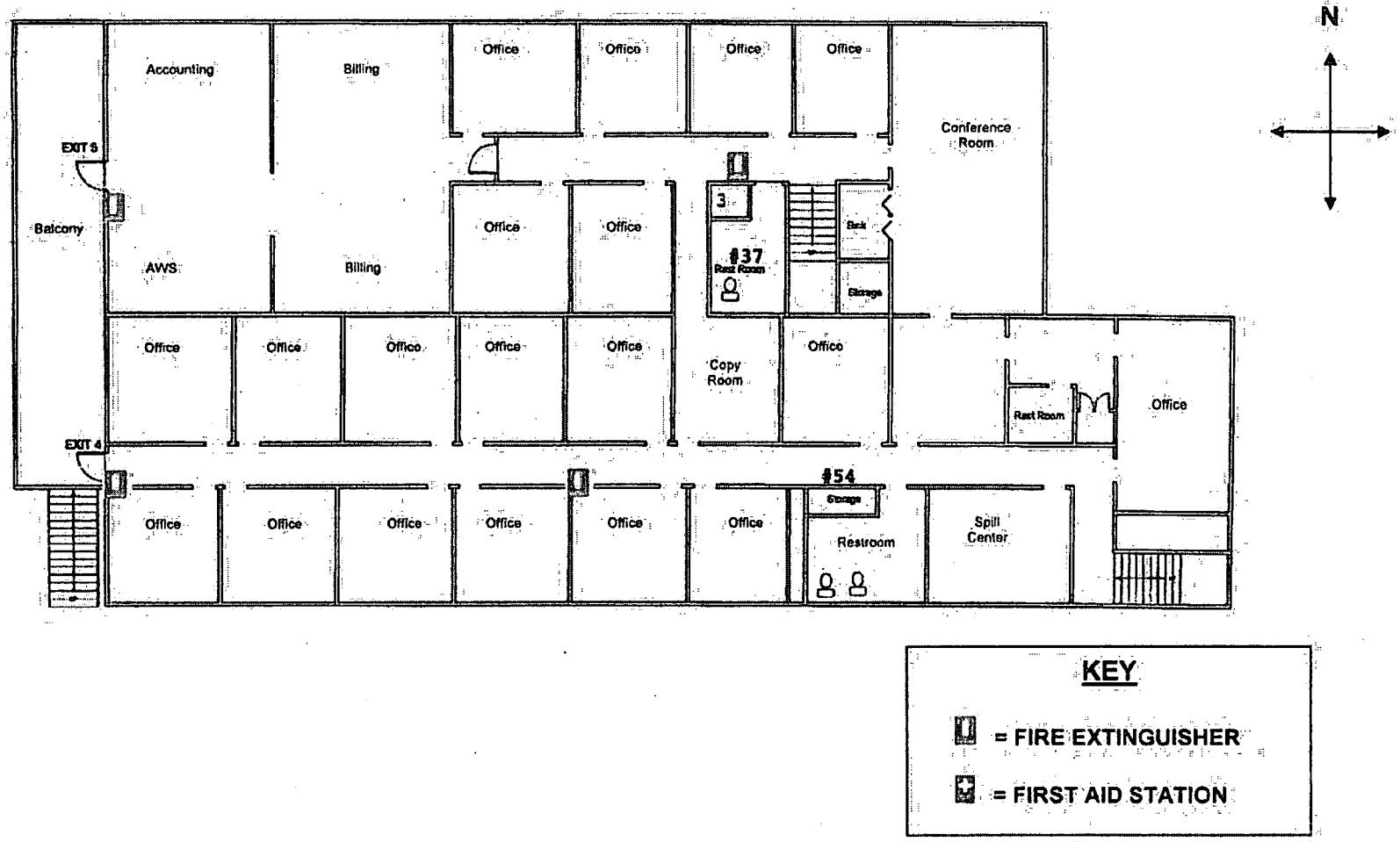


KEY

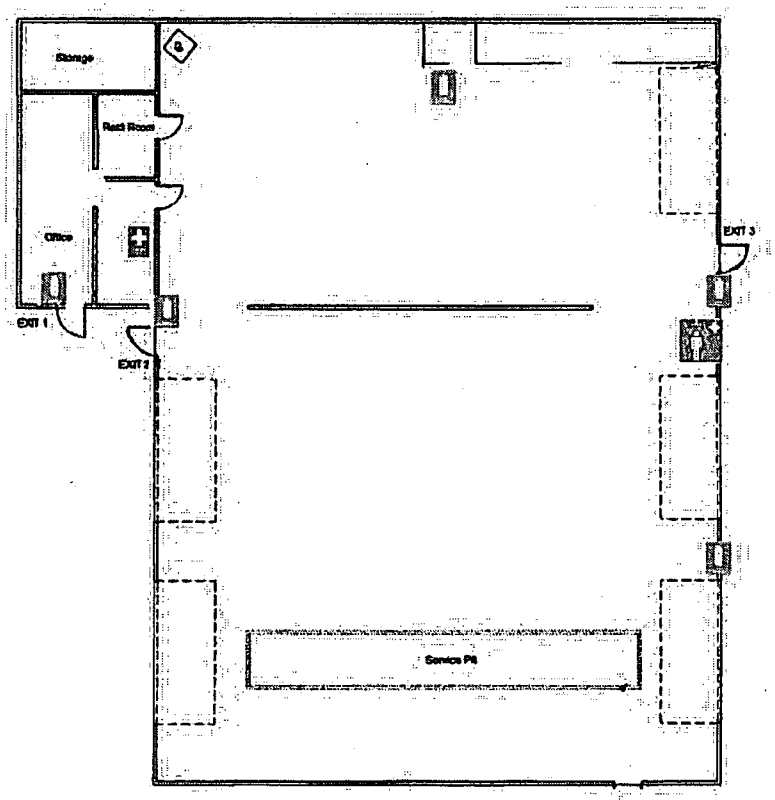
= FIRE EXTINGUISHER

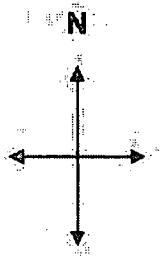
= FIRST AID STATION

BUILDING #1: SECOND FLOOR



BUILDING #2: MAINTENANCE SHOP





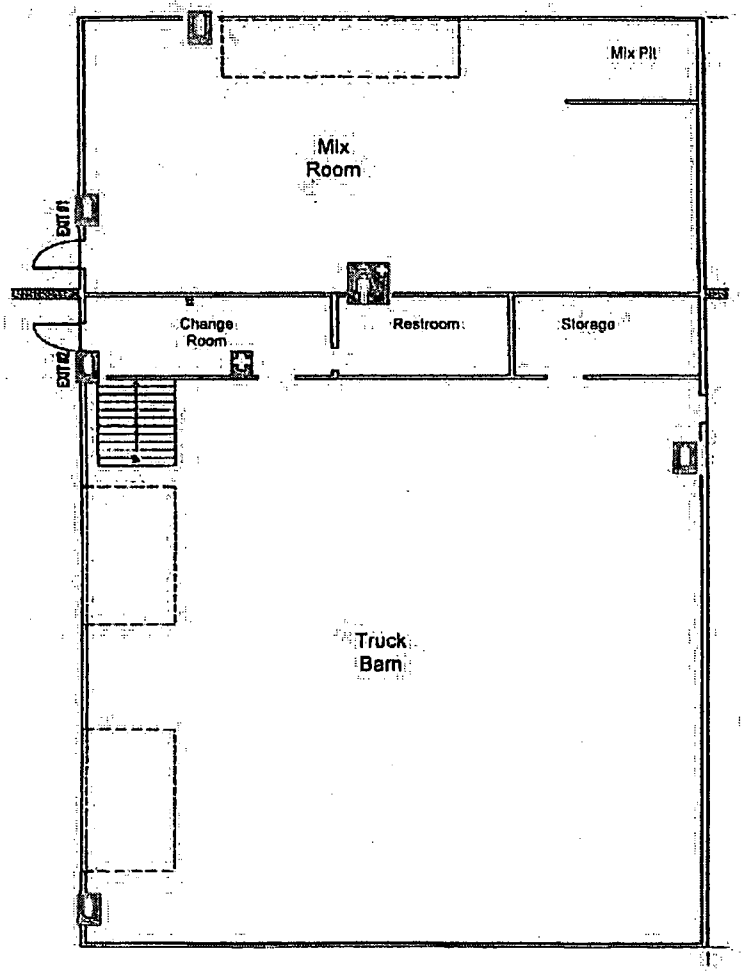
KEY

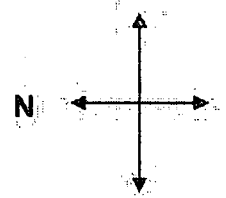
= FIRE EXTINGUISHER

= FIRST AID STATION

= EMERGENCY SHOWER/EYEWASH

BUILDING #3: MIX ROOM, CHANGE ROOM, TRUCK BARN





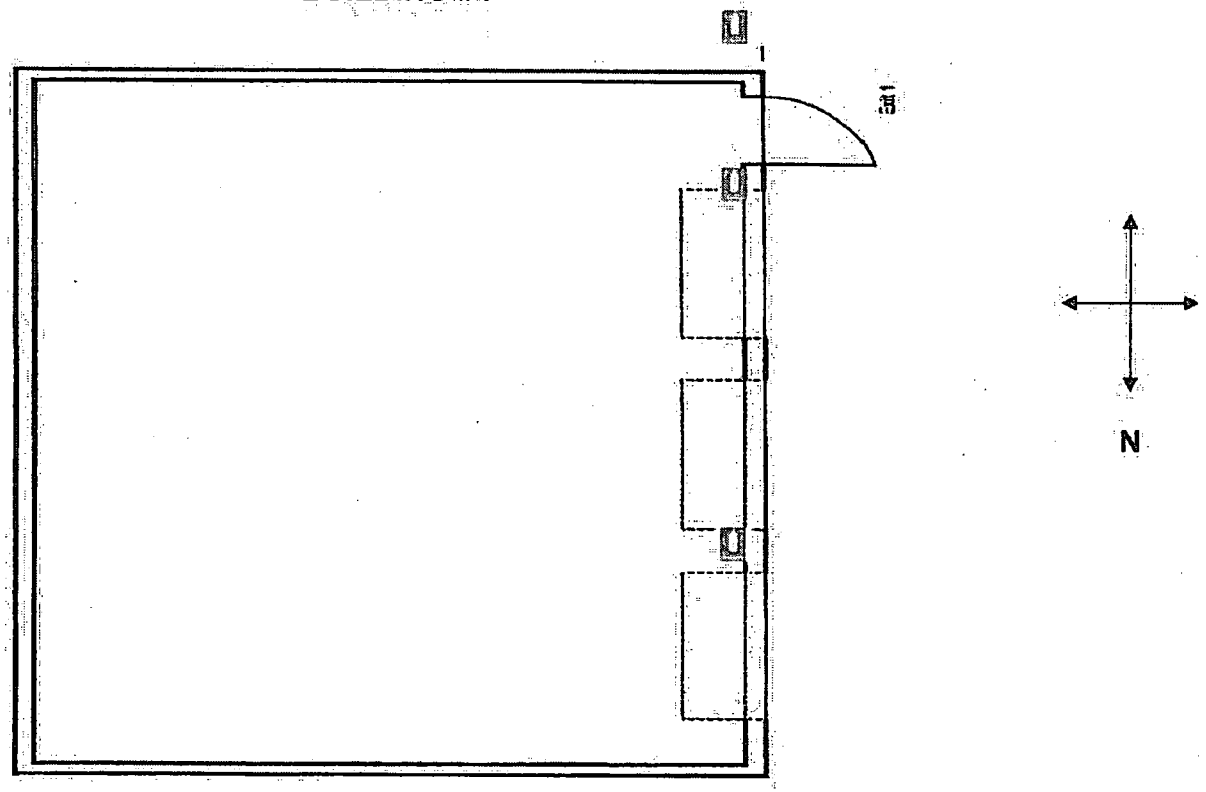
KEY

= FIRE EXTINGUISHER

= FIRST AID STATION

= EMERGENCY SHOWER/EYEWASH

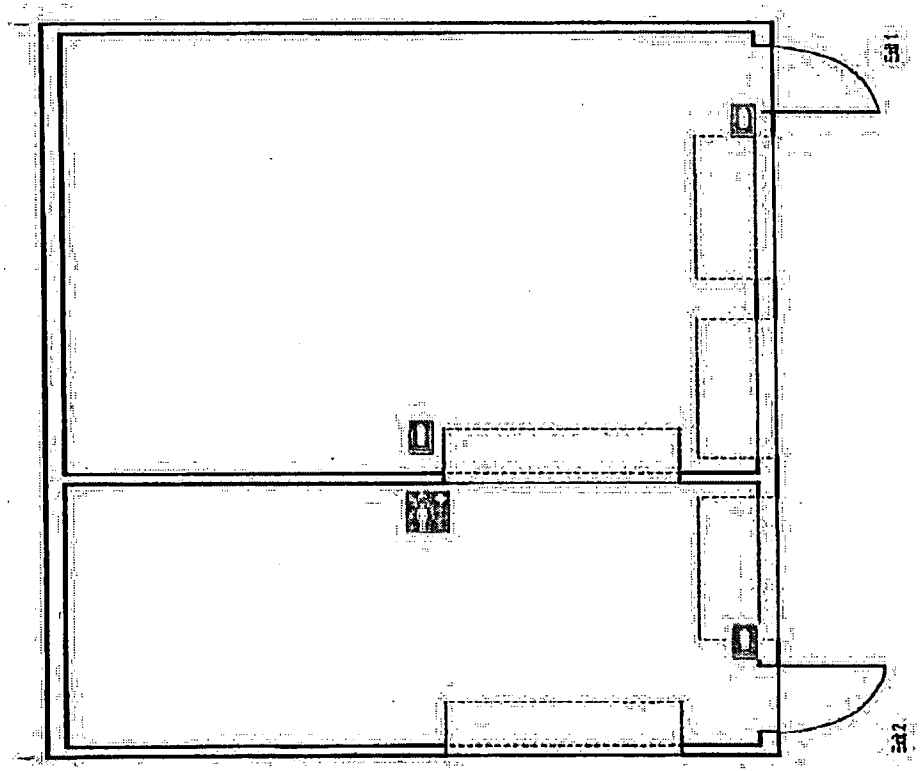
BUILDING #4

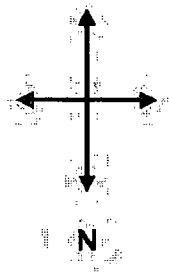


KEY

= FIRE EXTINGUISHER

BUILDING #5: SOUTHERN, CENTRAL & NORTHERN BAYS





KEY

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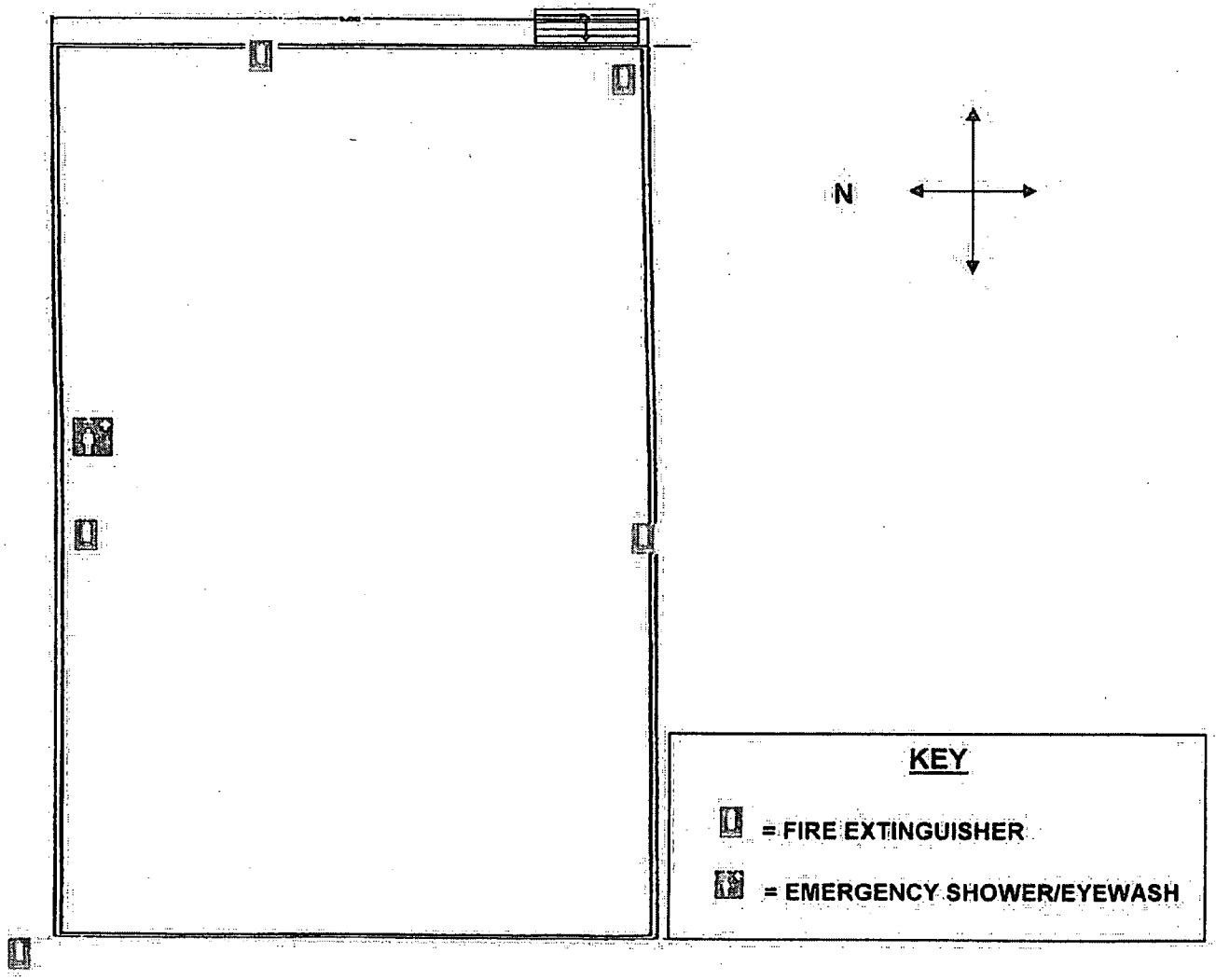
= EMERGENCY SHOWER/EYEWASH

DOCK #1



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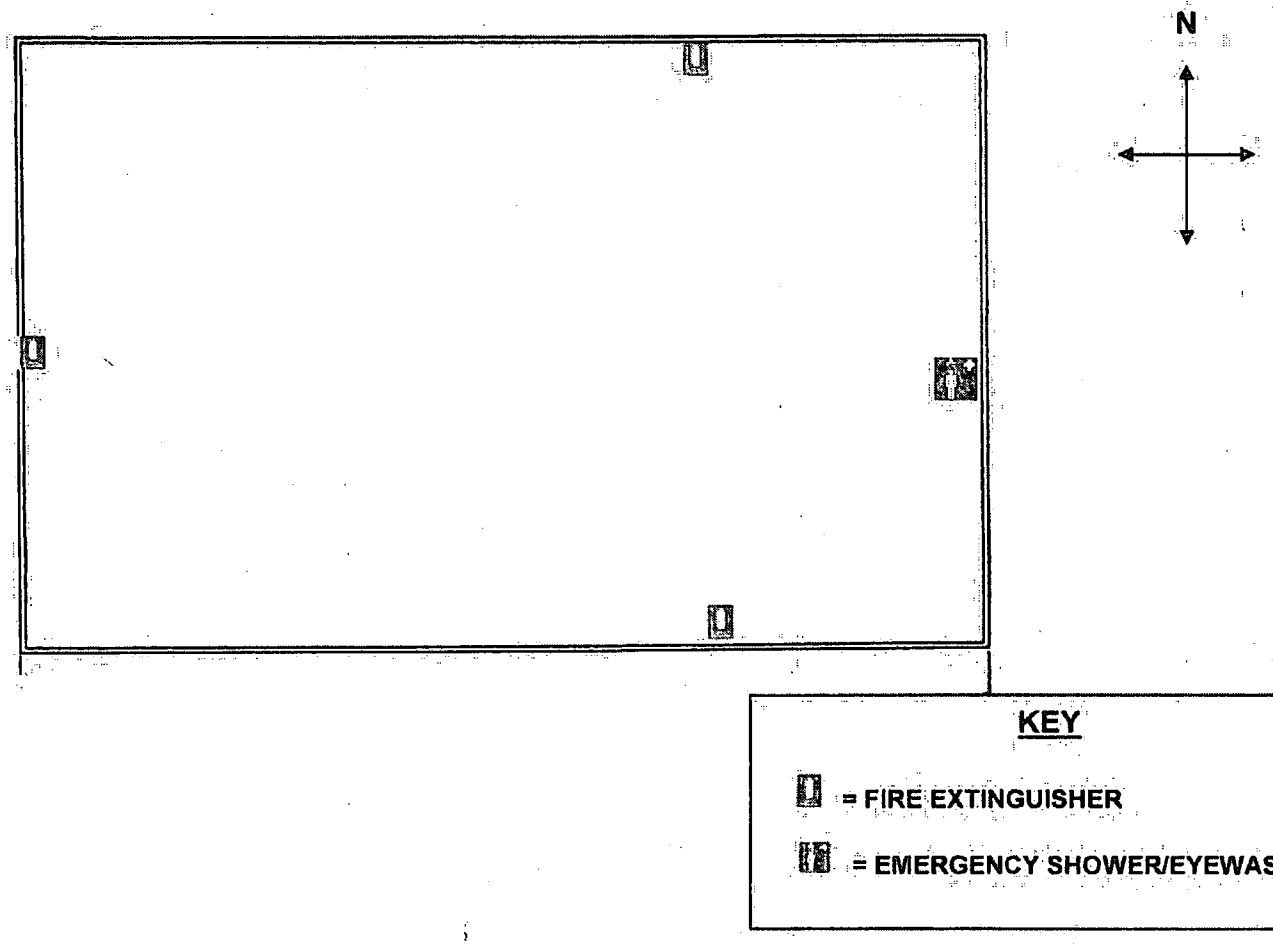

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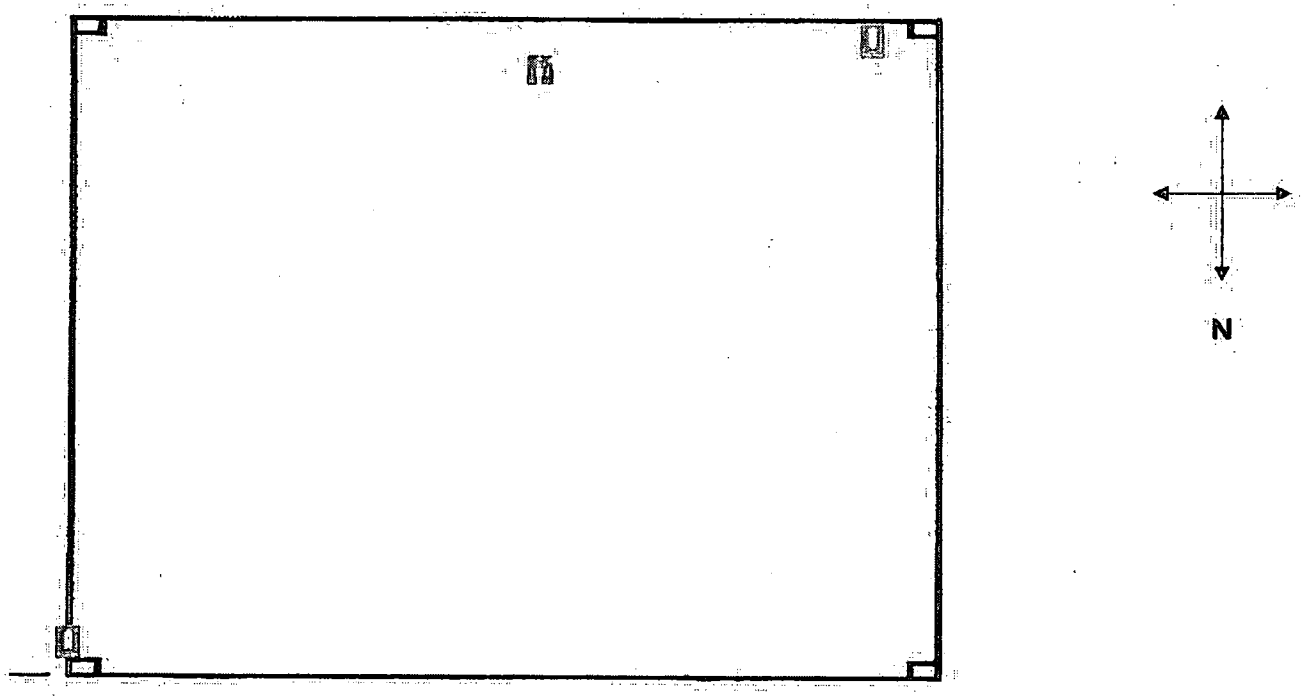
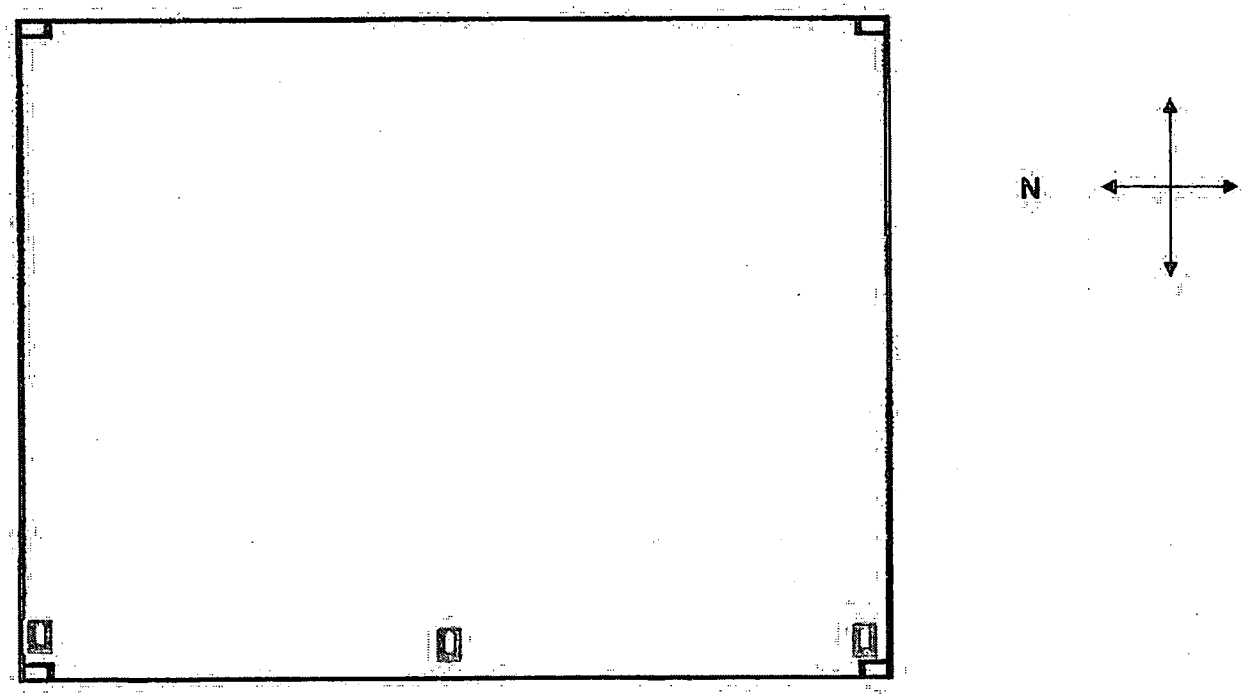


KEY

= EMERGENCY SHOWER/EYEWASH

= FIRE EXTINGUISHER

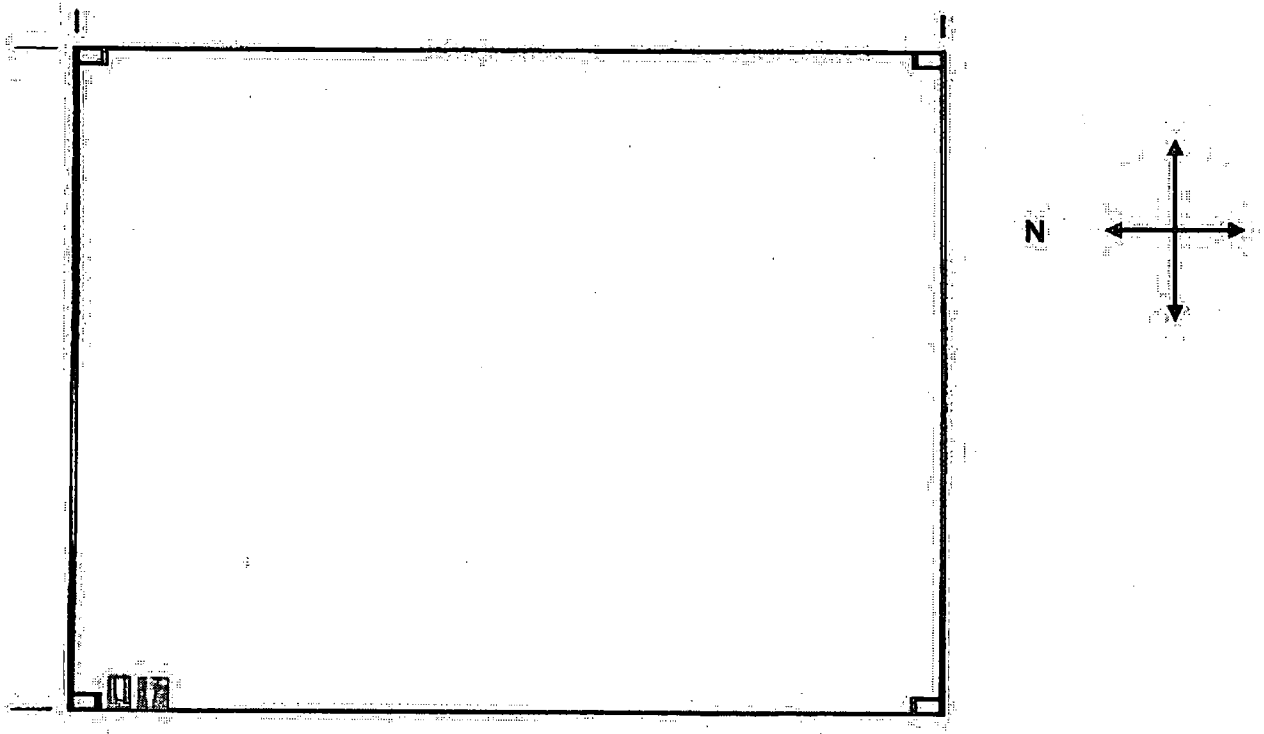
NONHAZADOUS STORAGE AREA



KEY

= FIRE EXTINGUISHER

BREEZEWAY PRODUCT STAGING AREA



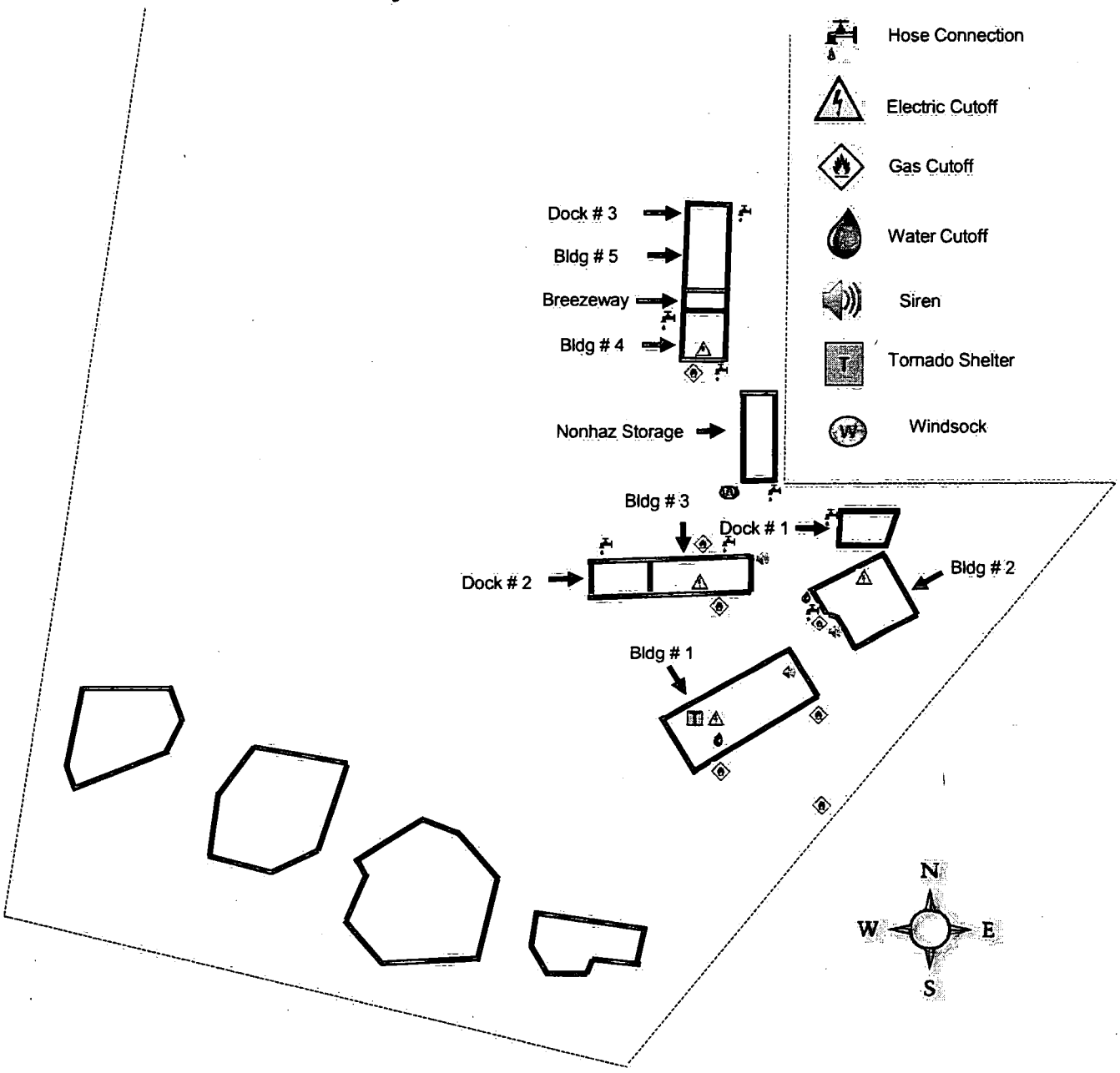
KEY

= EMERGENCY SHOWER/EYEWASH

= FIRE EXTINGUISHER

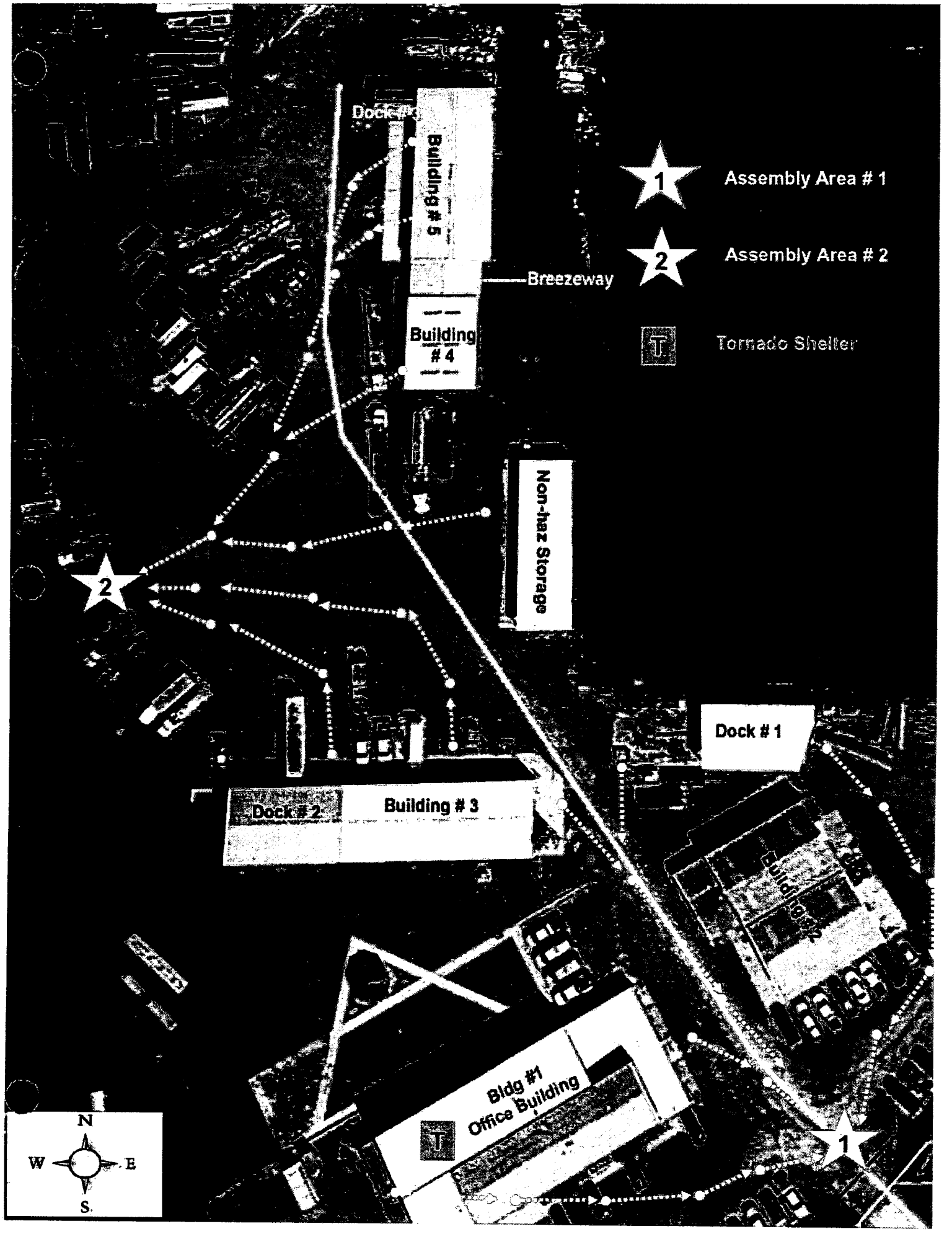
Site Facility Utility Map

EMI Utility Shutoff Locations



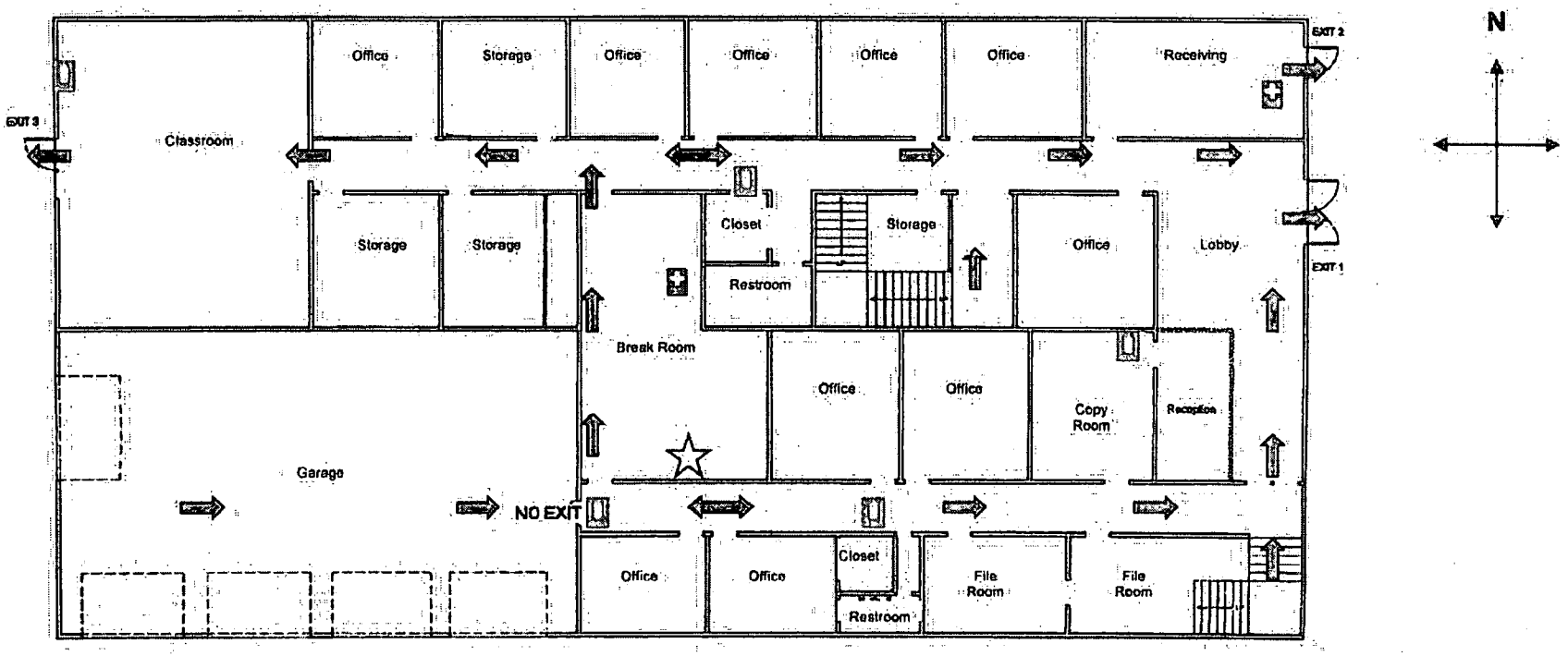
Evacuation Maps

Environmental Management, Inc.
Evacuation Route



EMERGENCY EVACUATION PLAN

BUILDING #1: FIRST FLOOR



IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

KEY

= EVACUATION ROUTE

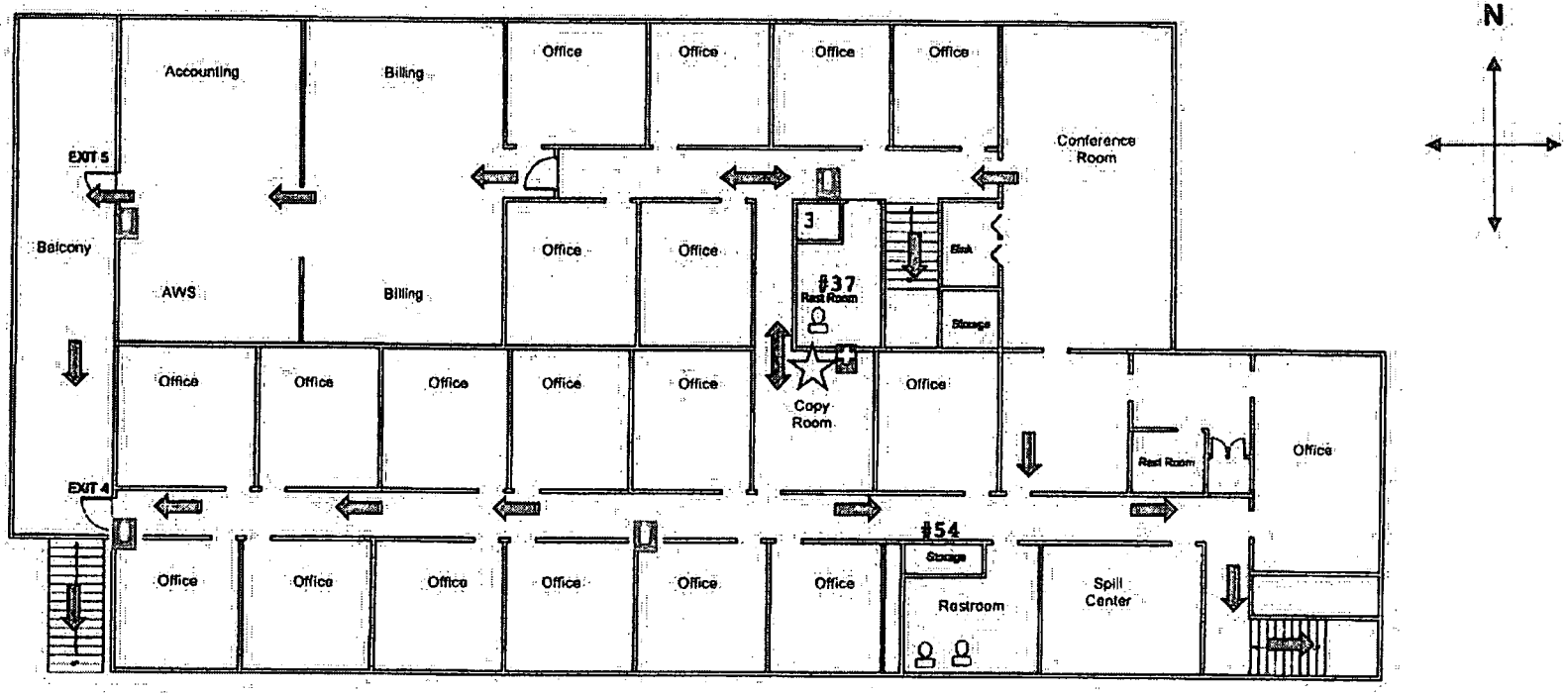
= FIRE EXTINGUISHER

= FIRST AID STATION

= YOU ARE HERE MARKER

EMERGENCY EVACUATION PLAN

BUILDING #1: SECOND FLOOR



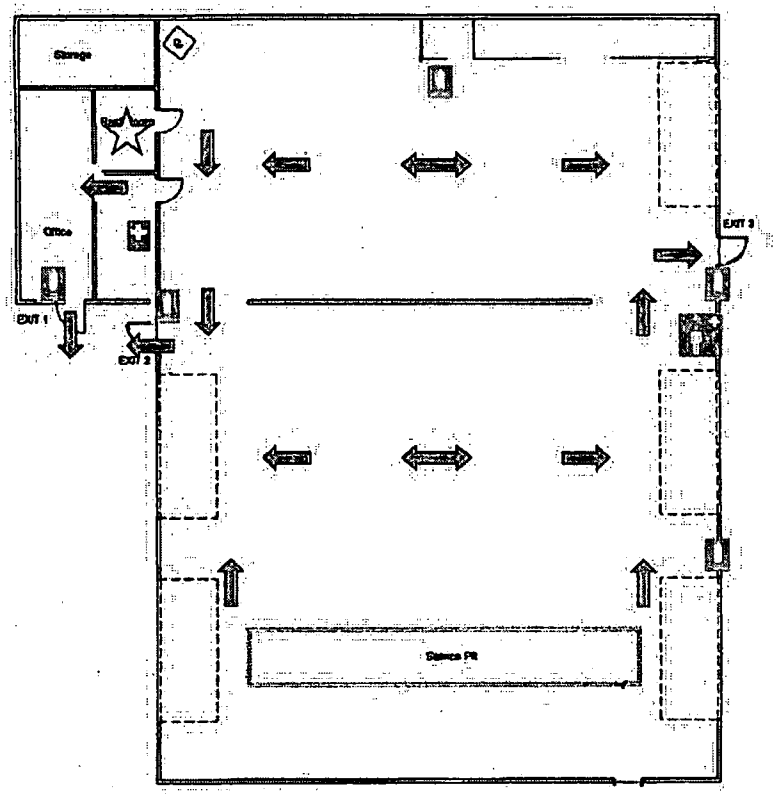
IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

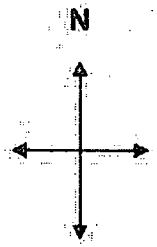
KEY

- = EVACUATION ROUTE
- = FIRE EXTINGUISHER
- = FIRST AID STATION
- = YOU ARE HERE MARKER

EMERGENCY EVACUATION PLAN

BUILDING #2: MAINTENANCE SHOP





KEY

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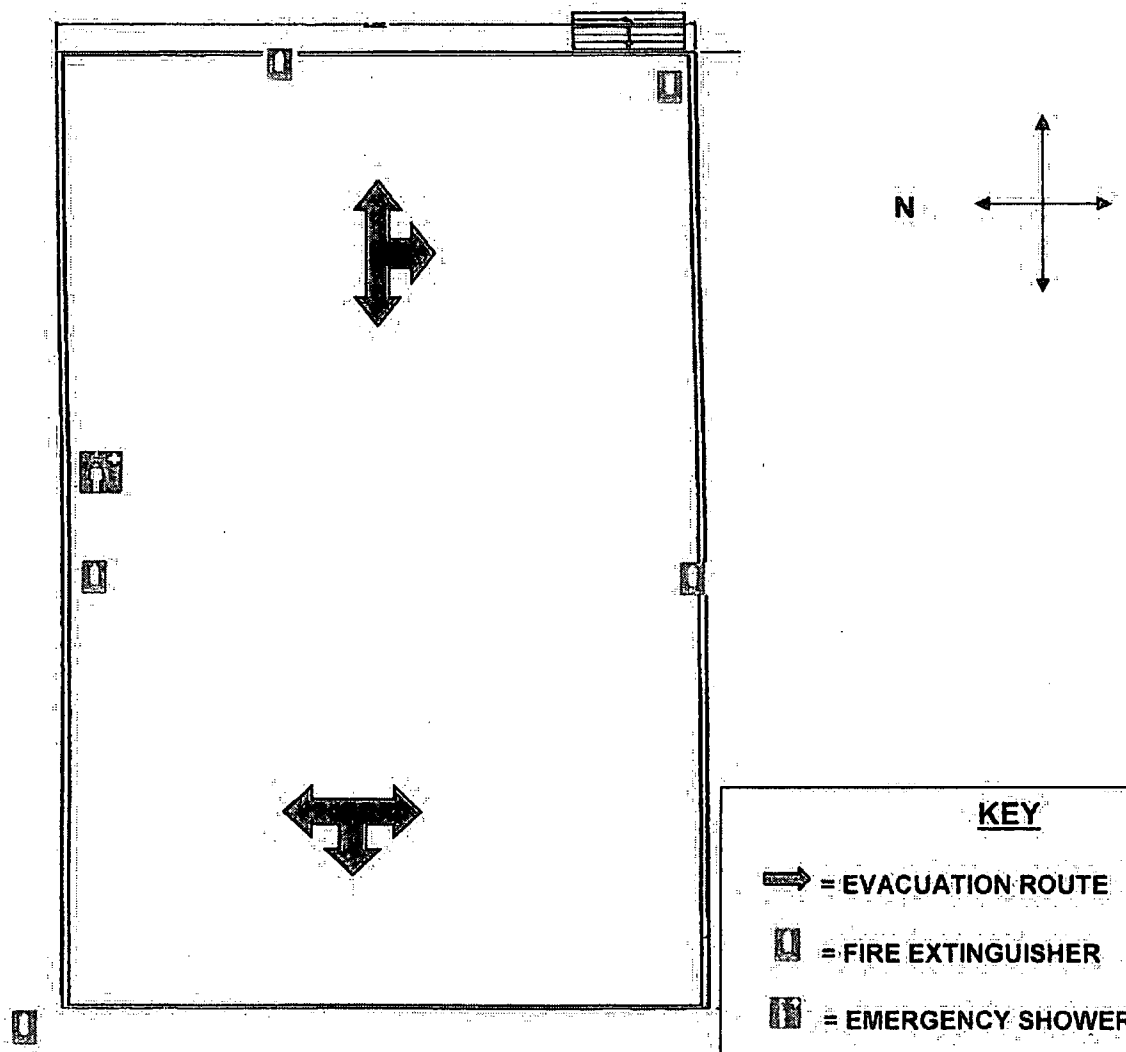
- = FIRE EXTINGUISHER
- = FIRST AID STATION
- = EMERGENCY SHOWER/EYEWASH
- = YOU ARE HERE MARKER

IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

EMERGENCY EVACUATION PLAN

DOCK #1



KEY

= EVACUATION ROUTE

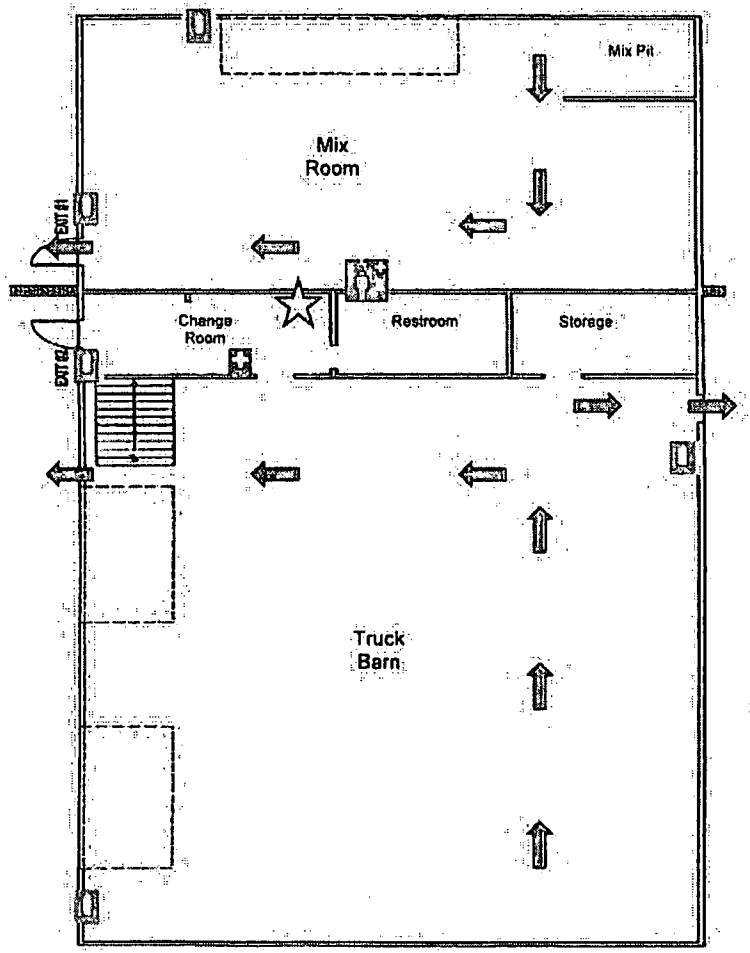
= FIRE EXTINGUISHER

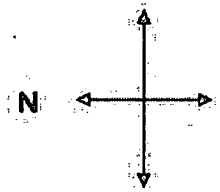
= EMERGENCY SHOWER/EYEWASH

IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

EMERGENCY EVACUATION PLAN

BUILDING #3: MIX ROOM, CHANGE ROOM, TRUCK BARN





KEY

= EVACUATION ROUTE

= FIRE EXTINGUISHER

= FIRST AID STATION

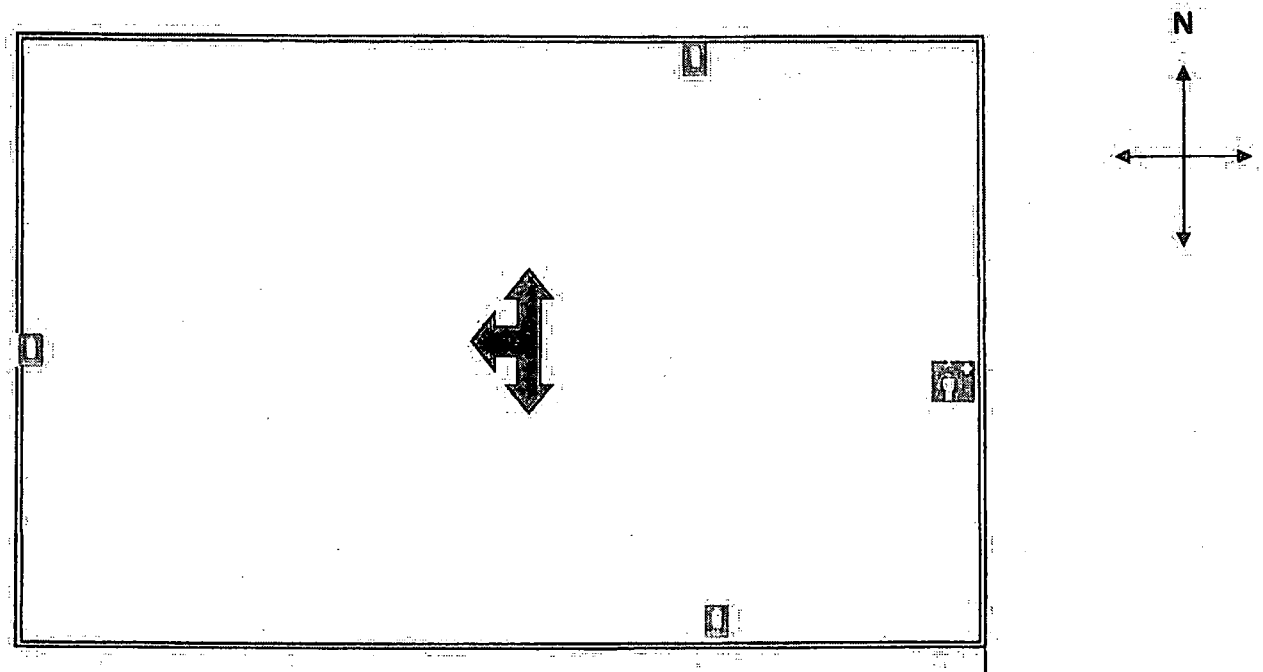
= EMERGENCY SHOWER/EYEWASH

= YOU ARE HERE MARKER

IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

EMERGENCY EVACUATION PLAN

DOCK #2



KEY

= EVACUATION ROUTE

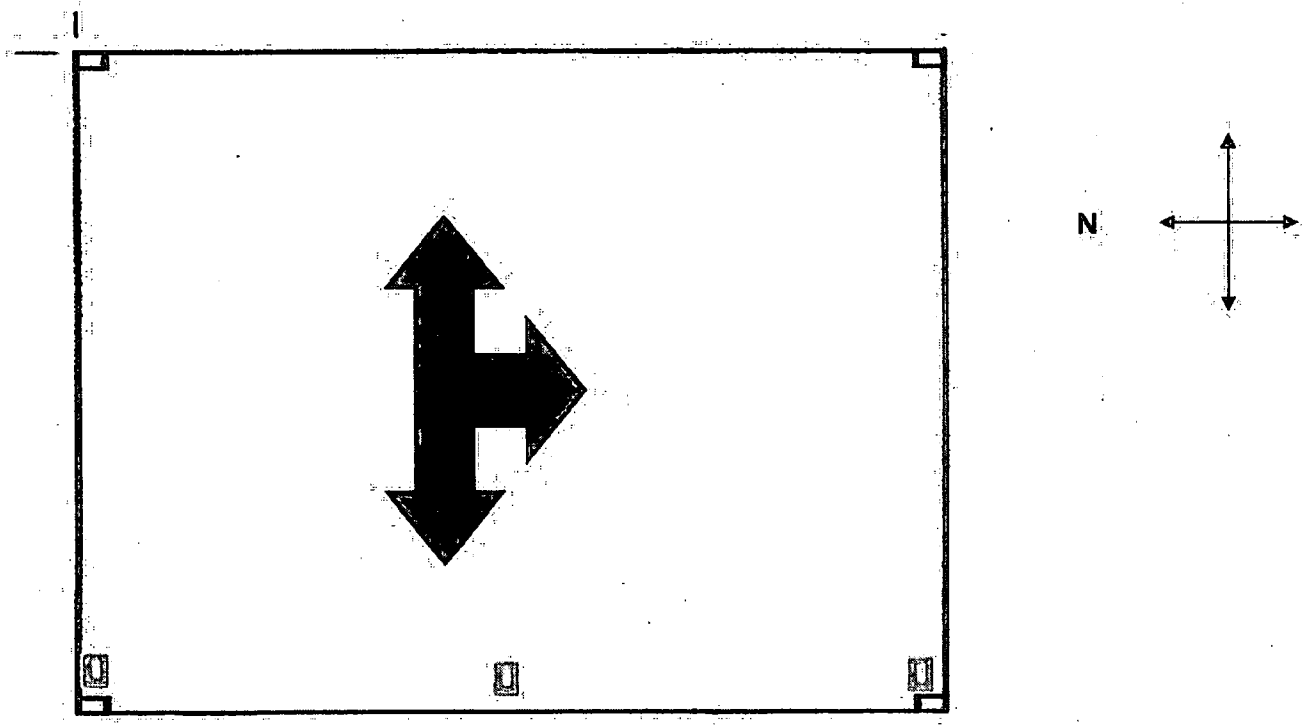
= FIRE EXTINGUISHER

= EMERGENCY SHOWER/EYEWASH

IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

EMERGENCY EVACUATION PLAN

NONHAZADOUS STORAGE AREA

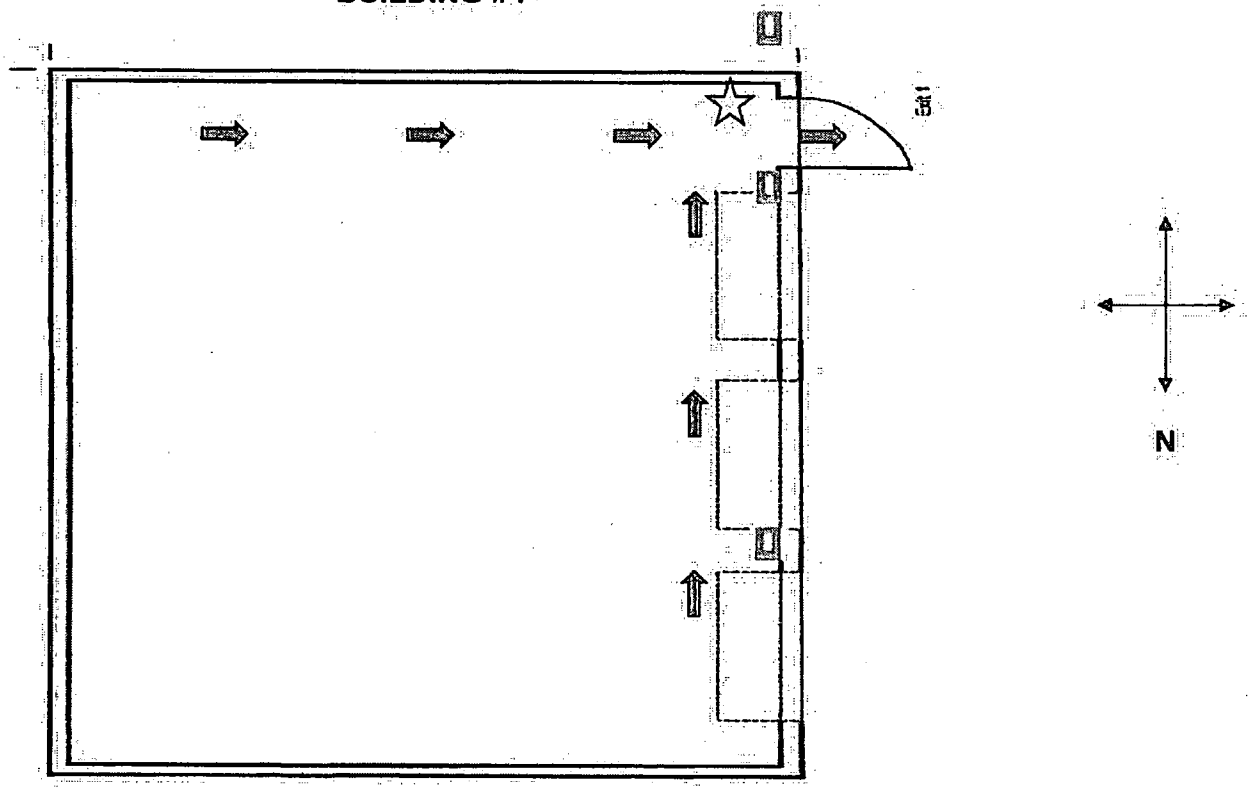


KEY

= FIRE EXTINGUISHER

EMERGENCY EVACUATION PLAN

BUILDING #4



IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

KEY

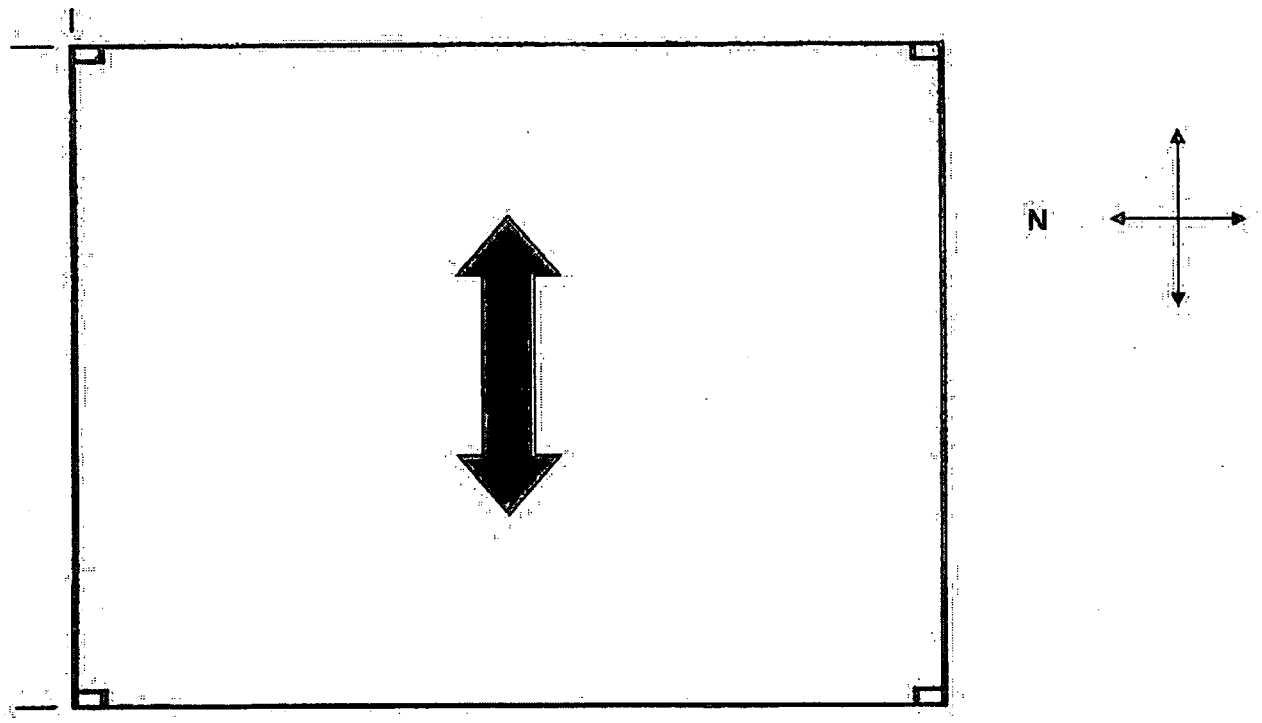
= EVACUATION ROUTE

= FIRE EXTINGUISHER

= YOU ARE HERE MARKER

EMERGENCY EVACUATION PLAN

BREEZEWAY PRODUCT STAGING AREA



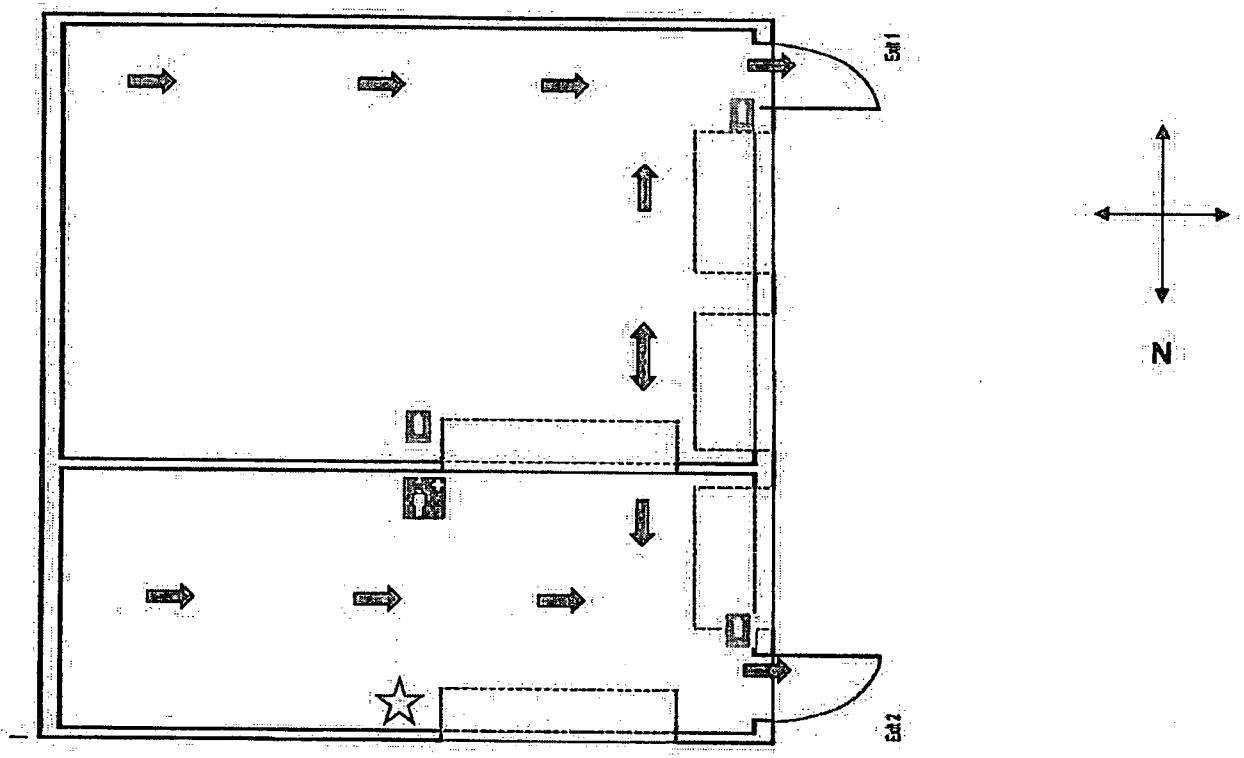
IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

KEY

= EVACUATION ROUTE

EMERGENCY EVACUATION PLAN

BUILDING #5: SOUTHERN & CENTRAL BAYS



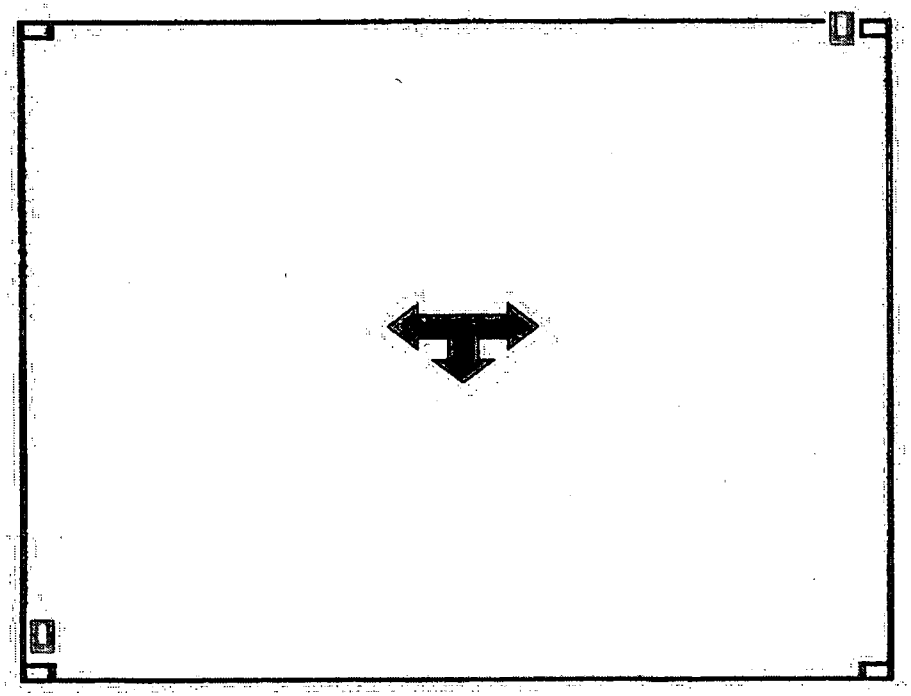
KEY

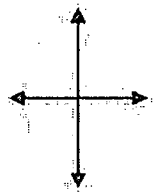
- = EVACUATION ROUTE
- = FIRE EXTINGUISHER
- = EMERGENCY SHOWER/EYEWASH
- = YOU ARE HERE MARKER

IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

EMERGENCY EVACUATION PLAN

DOCK #3





IN CASE OF AN EMERGENCY, FOLLOW THE PATH INDICATED BY THE BLUE ARROWS TO THE CLOSEST EXIT

KEY

= EVACUATION ROUTE

= FIRE EXTINGUISHER

ATTACHMENT 25

- PRODUCT DISTRIBUTION PROGRAM PLAN

PRODUCT DISTRIBUTION PROGRAM

Environmental
MANAGEMENT

2016

Revised 7/18/16

Previous Copies Obsolete

Purpose

The purpose of this program is to ensure that all employees of Environmental Management (EMI) are managing damaged freight, off-specification product, out-of-date product, and consumer commodity materials in a uniform and consistent manner, according to the guidelines set forth by Environmental Management with the acknowledgment of the Oklahoma Department of Environmental Quality (DEQ) and in accordance with all applicable laws and regulations.

Scope

This program is applicable to all employees of Environmental Management who may have a part in the Product Distribution Program, whether it is on site, processing at the EMI facility and/or in an administrative capacity. The term "Product", as it applies in this document, refers to items that meet the definitions below of Damaged Freight, Off-Specification Products, and Out-of-Date Products which could be received at Environmental Management under this program.

Definitions

"Bill of Lading" means the document issued describing the kind and quantity of goods being shipped, the shipper, and the consignee; may also include EMI's Shipping Ticket.

"Commodity" means any article of commerce (i.e. goods or merchandise).

"Consignee" means any person who has been designated to receive goods from a shipper.

"Consignor" means any person or company that ships goods or merchandise.

"Damaged Freight" means any product for which the packaging is damaged in the normal course of manufacture, storage, transportation, or use and remains in the original container/package, or has been re-containerized in an uncontaminated condition.

"Safety Data Sheet" (SDS - also known as Material Safety Data Sheet, MSDS) is a document with information that can help identify ingredients, physical characteristics, specific hazards, and personal protection information. This document may also help to determine if the product, if discarded, is a regulated waste. This document is mandated of all chemical manufacturers by OSHA.

"Off-Specification Product" means a product that may be deemed unsuitable for normal retail sale due to a fluctuation in temperature, exposure to heat or cold, or some other action that renders the product not up to the normal standard in the retail market, but is still a usable product. This also includes products that are deemed not up to the stringent specifications of the original consumer, but are still usable by other entities with less stringent requirements.

"Out-of-Date Product" means a product that has exceeded its intended shelf life and therefore cannot be sold in the normal retail market as a first-quality material, but is still a usable product. This also includes products that, due to the expiration date, might not be used by the original consumer but may still be used by other entities with less stringent requirements.

"Product" means any material that is unused and uncontaminated and can be utilized for a benefit to an entity.

Acceptance Procedure

Products may be delivered to Environmental Management by a participating company (client) or may be picked up at the client's facility by Environmental Management and/or a common carrier. All products in this program will be kept separate from any other materials the client may offer to Environmental Management (except during transport to the EMI facility). The Project Manager will obtain a separate job number, all paperwork will be separated, and the materials will be stored separately at the Environmental Management facility.

Prior to acceptance, the client will notify Environmental Management of the specific products they have for the program. This information must include the material name, hazard classification, container count and sizes with specific information about the actual contents of the container(s), and the client's tracking number (if available, such as a bill of lading or PRO number, incident number, etc.). An SDS or other product data sheet must be provided with the notification. If Environmental Management must obtain the SDS through other means, additional charges to the client will apply. The Project Manager can use the Criteria for Product Acceptance (see Attachment 1) to determine eligibility of the client's materials. Prescription medications taken or applied internally will not be accepted into the program. Topical medications are acceptable.

For products delivered to Environmental Management:
Based on the information provided by the client, a tracking document (Bill of Lading or Shipping Ticket) will be prepared in advance of the arrival of the products. It must be clearly marked **PRODUCT DISTRIBUTION** and should be in the Receiving Area and available when the material arrives. The client should adhere to all appropriate DOT regulations for their shipment. If they present their own Bill of Lading, a staff member will compare the information on the client's Bill of Lading to the information prepared in advance to ensure it matches. If the shipment cannot be verified with what was expected, the Project Manager must be notified immediately to rectify the discrepancy. In the event the materials are non-conforming, other actions may be taken including removing the material from the program, additional charges to the client, and possibly rejection of the container.

When materials are shipped to Environmental Management, there is the possibility that non-hazardous and CESQG hazardous waste may be among the product items. After inspection and verification, all waste materials will be stored in their designated areas which are separate from any product storage area.

All containers must be in DOT-shippable condition. If they arrive and are found to not be in good condition, Environmental Management staff will overpack and re-label the container and the client will be charged for the overpack container, the time to overpack it, and any clean-up activities associated with the improper packaging. The charges will be based on the current Environmental Management rate sheets.

All containers must be labeled appropriately upon arrival at Environmental Management. Proper DOT markings must be visible, and an additional label indicating the proper shipping name and Environmental Management tracking numbers (Job number and other tracking document

numbers) must be applied. Additionally, the date of acceptance by EMI must be clearly visible on all containers.

For materials picked up by Environmental Management:
Based on the information provided by the client, a tracking document (Bill of Lading or Shipping Ticket) will be prepared and taken to the client's facility. The material to be picked up will be inspected and compared with the originally reported information. Any materials found to not meet the criteria of the Program will be reported to the Project Manager and the client and handled according to their specifications.

All containers must be in DOT-shippable condition. If they are found to not be in good condition, Environmental Management staff will overpack the container and the client will be charged for the overpack container and the additional time. Cleanup activities associated with the improper packaging will be the responsibility of the client, unless they specifically request that service. Any additional charges will be based on the current Environmental Management rate sheets.

All containers must be labeled appropriately prior to transport to Environmental Management. Proper DOT markings must be visible, and an additional label indicating the proper shipping name and Environmental Management tracking numbers (Job number and other tracking document numbers) must be applied. Additionally, the date of acceptance by EMI must be clearly visible on all containers.

Regardless of how the material gets to Environmental Management, items will be unloaded and inventoried within five business days. A complete inspection shall be made of the quantity and condition of the material received, and an accurate record shall be made and kept of any discrepancies or variations between the initial information obtained and the actual material received. The Project Manager will be notified of any discrepancies and will contact the client to reconcile the discrepancy and obtain accurate information (i.e. SDS) regarding the material that was received.

Products suitable for utilization will be placed in a secured warehouse, dedicated dock storage area, or other designated storage area for a period not to exceed 45 days (with some exceptions, see Attachment 2). Materials not transferred after the 45-day period will be submitted to a Coordinator for further evaluation. Upon exhausting all potential options for use, the material will be declared a waste by Environmental Management and will be processed for final disposition with Environmental Management listed as the generator of record.

For materials found to not meet the criteria of the Program (at the discretion of the Product Distribution Coordinator), the Project Manager will be notified immediately and they will determine (based on their knowledge of the shipper and the material) if the material will be kept for processing as a waste at the EMI facility, or if it will be rejected to a manifest and shipped off-site. If the material will be kept for processing, it will be declared a waste by Environmental Management, removed from the product documentation, and moved to a new tracking document for waste. The material will then be processed as a waste through Environmental Management's normal processes. Environmental Management will be listed as the generator of record for purposes of final disposition. Disposal pricing for these materials will be in accordance with Environmental Management's standard rate sheets.

Product Distribution Coordinator Procedures

Upon the arrival of materials, the containers will be processed as specified above. Any discrepancies in piece count or quality of material will be noted on the tracking documents and the Project Manager will be notified. An accurate count is crucial to the tracking of the material and such descriptors as color should be noted (i.e. instead of listing three one-gallon paints, the information should show one gallon blue latex paint, one gallon yellow striping paint, etc.). Items not intended for the Product Distribution Program will be moved out of the product storage area and to their appropriate storage area. The Product Distribution Program items will be kept separate from the Transfer Station storage areas.

The Coordinator or Technician will label each product item with a sequential number and the date the item was received. This product item number will be added to the tracking document which will be turned in to the Shipping & Receiving Records Management Department to be entered into Environmental Management's database tracking system. No further processing may be completed without the Work Order for the material, which is created from the database. The Work Orders will remain with the Coordinator for a period of 45 days and will be used as a tracking device for items that are available for utilization.

The Coordinator will make a list available to all employees of the current offered products. The material will also be marketed by website postings, email listings, and other means to individuals and companies.

When a party is interested in a particular product, the Coordinator should question the party regarding the intended use of the product. If the Coordinator feels the answer is not satisfactory, the product will not be given to the party without first consulting with the President of Environmental Management for approval. No items shall be placed back into commerce without the accepting party signing a Transfer of Inventory Form (see Attachment 3). This form includes the name, address, phone number, company name (if applicable), driver's license number, intended utilization, and signature of the accepting party. The Transfer of Inventory forms will be attached to the applicable Work Orders. The SDS will be given to the accepting party upon request.

All pesticides will be checked for restricted use status. Any pesticides that are restricted for use by a licensed applicator will only be given to an individual or organization that provides a copy of their applicator's license which will be kept with the Transfer of Inventory and the Work Order in the main file.

No product containers will be loaded into a vehicle where the accepting party and the container are not separated. Cars, SUV's, vans, minivans, etc., where the cargo area and the passenger area are shared are not acceptable. EMI will load containers onto pickup trucks, box trucks, flat-beds, trailers, etc. If the party arrives in an unacceptable vehicle, the Coordinator will warn the party of the dangers of loading the container in such a vehicle. If the party chooses to load the container themselves, EMI is not responsible and this should be noted on the Transfer of Inventory form.

After 45 days, if any material remains on a Work Order, it will be submitted to a Project Coordinator for further evaluation. Further evaluation can include further research into the usages of a product; research into entities that may be interested in a product; and, finally, declaration of waste status (see Attachment 2).

There are a few exceptions to the 45-day timeframe. Seasonal products specific to certain times of the year (such as swimming pool chemicals which are most commonly used in the summer) may be kept longer than 45 days to await the appropriate season. Other commonly-used items such as paint, for which we have a historically high return-to-commerce rate, may be kept longer than 45 days (see Attachment 2).

Upon completion of a Work Order, it will be turned in to the Shipping & Receiving Records Management Department so the processing information may be entered into the tracking database. All items which are placed back into commerce shall be noted in the database as "Accepted for Use by:" with the name of the entity who accepted it. The entry of items which are processed for disposal will conform to Environmental Management's regular process. Upon completion of final disposition of all items on a Work Order, it will be filed in the permanent client file.

Environmental Management reserves the right to modify and change the procedures herein in the event that other methods are found to be more beneficial while still conforming to all applicable local, state, and federal regulations. DEQ will be notified by EMI prior to any such modification.

Attachment 1

Environmental Management, Inc.
Criteria for Product Acceptance*

*Includes off-specification, out-of-date, and damaged products.

	Yes	No	
1.	❑	❑	Is the material an unused and uncontaminated product contained in its original container or a shippable DOT container?
2a.	❑	❑	Is the material still under the control of the manufacturer, transporter, original consumer, or wholesaler? Will this entity be willing to let Environmental Management take ownership of the material and handle it in a proper manner? If yes, skip to Question 3. If no, continue to Question 2b.
2b.	❑	❑	If the material has been delivered to a retail customer, is that customer willing to let Environmental Management take ownership of the material and give the material away or handle it without restrictions? If yes, continue to Question 2c. If no, the material cannot be handled under the Product Distribution Program.
2c.	❑	❑	Does the material have any remaining value? (for example: If the material is several years old and the owner does not want to use it because they know it does not meet their quality standards and thus would be of no use to a similar company in a similar process, it may not have any remaining value. However, if it is a common material such as paint for which the quality is paramount to a business but not to an individual, it may have value for utilization.) If yes, continue to Question 3. If no, the material cannot be handled under the Product Distribution Program.
3.	❑	❑	Has an SDS been provided by the client or is Environmental Management able to obtain one easily?

If any question other than 2a was answered no, the material cannot be handled under the Product Distribution Program.

Attachment 2

TIMELINES

The "further evaluation" timeline which we currently follow is:

1. 30-60 Days – Exhausting all user options (including but not limited to researching alternate uses, individuals, or industries that might be interested)
2. 30-45 Days – Obtaining disposal pricing options, selecting disposal outlet
3. 30-45 Days – Profiling and approval for disposal, scheduling shipment

(All timeframes could be consecutive or concurrent. Items 2 and 3 are dependent upon outside individuals and are beyond the control of Environmental Management)

The exception items which are seasonal products could be a wide variety of materials. The routine items are:

a) Swimming pool chemicals – utilized primarily May to September – items received in October would be held such that the 45 day utilization time frame would begin June 1st,
b) Paint related materials – utilized primarily spring thru fall – paint received in summer or winter would not start their 45 day timeframe until March or September,
c) Pesticides – utilized primarily summer months – held same as pool chemicals,
d) Fertilizer – utilized primarily in the spring – time frame would start March 1st,
e) Outboard oils – utilized primarily May to September – time frame would start June 1st.

Attachment 3

Environmental Management, Inc.

P.O. Box 700 Guthrie, OK 73044 /405-282-8510

Transfer of Inventory

I, _____, do hereby agree that the materials listed below were (☐ shipped to / ☐ picked up by) me and will be used for their intended purpose or in a proper utilization. I knowingly accept full responsibility and total liability for these materials at this time. I further acknowledge and agree that these materials are being accepted as damaged or out-of-date or off-specification goods, that they carry neither warranty nor guarantee. I further agree that I will store and use these items in such a manner to ensure the protection of the environment and in compliance with all applicable laws and regulations. I further agree that if for any reason I must dispose of this material for a fee, said fee will be my responsibility. I agree to indemnify, defend and hold harmless the product manufacturer, product distributor and Environmental Management, Inc., their respective present and future officers, employees, agents or assigns from and against any and all claims, demands, suits cause of action in law or equity, expenses and liability of any nature based upon any damage, destruction of property, injury, or death of persons or action arising out of use of this product transferred to the above individual or organization as damaged, out-of-date, or off-specification goods.

Materials*: _____

*For restricted pesticides, a copy of the Pesticide Applicator's License must be obtained.

Job #: _____

Product Tracking Number: _____

Shipping Ticket# w/Line Item: _____

Printed Name	Company Name
Signature	Address
Drivers License Number	City, State, Zip
Date	Phone Number

Please state your intended usage for this product:

_____

_____

Environmental Management Agent	Date

ATTACHMENT 26

- EPA RCRA SUBTITLE C ID FORM
- ODEQ DISPOSAL PLAN
- ODEQ NHIW CERTIFICATIONS

EPA RCRA Subtitle C Identification Form

Send completed form to this address:	U.S. ENVIRONMENTAL PROTECTION AGENCY **RCRA SUBTITLE C SITE IDENTIFICATION FORM (2015)** The Appropriate State or EPA Regional Office
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	**Reason for Submittal:** ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) ☐ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information). ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application. ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____). ☒ As a component of the Hazardous Waste Report. (If marked, see sub-bullet below) ☒ Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)
2. Site EPA ID Number	**EPA ID Number:** OKD982293334
3. Site Name	**Name:** ENVIRONMENTAL MANAGEMENT, INC.
4. Site Location Information	**Street Adress:** 5200 NORTHEAST HIGHWAY 33 **City, Town, or Village:** GUTHRIE **County:** OK083 **State:** OK **Country** US **Zip Code:** 73044
5. Site Land Type	☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other
6. NAICS Code(s) for the Site	**A.** 562111 **B.** 562112 **C.** 541620 **D.** 562991
7. Site Mailing Address	**Street or P. O. Box:** P.O. BOX 700 **City, Town, or Village:** GUTHRIE **State:** OK **Country:** US **Zip Code:** 73044
8. Site Contact Person	**First Name:** TERRY **MI:** D **Last Name:** BOBO **Title:** PRESIDENT **Street or P. O. Box:** P.O. BOX 700 **City, Town, or Village:** GUTHRIE **State:** OK **Country:** US **Zip Code:** 73044 **Email :** jnewton@emiok.com **Phone:** 4052828510 **Ext:** **Fax:** 4052828533
9. Operator and Legal Owner of the Site	**A. Name of Site's Owner:** ENVIRONMENTAL MANAGEMENT, INC. **Date Became Owner:** 01/01/1988 **Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other **Street or P. O. Box:** SAME AS #7 **City, Town, or Village:** GUTHRIE **Phone** **State:** OK **Country:** US **Zip Code:** 73044
	B. Name of Site's Operator: Environmental Management, Inc. **Date Became Operator:** 01/01/1988 **Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

10. Type of Regulated Waste Activity
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.

Y☒ N☐ **1. Generator of Hazardous Waste**
If Yes, choose only one of the following - a, b, or c.

☒ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup

☐ b. SQG:. 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or

☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

If "Yes" above, indicate other generator activities.

Y☐ N☒ 2 Short-Term Generator (generate from a short-term or onetime event and not from on-going processes). If "Yes", provide an explanation in the Comments

Y☐ N☒ 3. United States Importer of Hazardous Waste

Y☐ N☒ 4. Mixed Waste (hazardous and radioactive) Generator

Y☒ N☐ **5. Transporter of Hazardous Waste**
If Yes, mark all that apply.

☒ a. Transporter

☐ b. Transfer Facility (at your site)

Y☐ N☒ **6. Treater, Storer, or Disposer of Hazardous Waste (at your site)**
Note: A hazardous waste permit is required for this activity.

Y☐ N☒ **7. Recycler of Hazardous Waste (at your site)**

Y☐ N☒ **8. Exempt Boiler and/or Industrial Furnace**
If Yes, mark each that applies.

☐ a. Small Quantity On-site Burner Exemption

☐ b. Smelting, Melting, and Refining Furnace Exemption

Y☐ N☒ **9. Underground Injection Control**

Y☐ N☒ **10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

Y☒ N☐ **1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site.**
If "Yes", mark all boxes that apply:

a. Batteries	☒
b. Pesticides	☐
c. Mercury containing equipment	☒
d. Lamps	☒
e. Other (specify) _____	☐
f. Other (specify) _____	☐
g. Other (specify) _____	☐

Y☐ N☒ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this

C. Used Oil Activities; Complete all parts 1-4.

Y☒ N☐ **1. Used Oil Transporter**
If Yes, mark each that applies.

☒ a. Transporter

☒ b. Transfer Facility

Y☐ N☒ **2. Used Oil Processor and/or Re-refiner**
If Yes, mark each that applies.

☐ a. Processor

☐ b. Re-refiner

Y☐ N☒ **3. Off-Specification Used Oil Burner**

Y☐ N☒ **4. Used Oil Fuel Marketer**
If Yes, mark each that applies.

☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories-Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

☐ a. College or University

☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university

☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Wastes

A. Waste Codes for Federally Regulated Hazardous Wastes.

Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.
D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D022, D035, F001, F003, F005

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.

Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Notification of Hazardous Secondary Material (HSM) Activity

Y☐ N☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

14. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Operator, Owner, or an Authorized Representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	JAMIE E. NEWTON, WASTE DISPOSAL COORDINATOR	03/17/2016

ODEQ Disposal Plan

Disposal Plan For

ENVIRONMENTAL MANAGEMENT, INC.

AS OF 11/1/2016

Below is a listing of the disposal plan for your firm as required by the Oklahoma Hazardous Waste Act, Section 1-2-7-105. This is not a permit and does not consitute authorization or endorsement of any particular disposal practice, method, or site.

Plant Address:
5200 NE HIGHWAY 33
GUTHRIE, OK 73044-

Attn: TERRY BOBO
PO BOX 700
GUTHRIE, OK 73044-

Comments:

EPA ID : OKD982293334

Disposal Plan Number : 42003 **Approval Date :** 9/18/1997

Comments :

Stream No : 473 **WASTE NON-HALOGENATED SOLVENTS**

Onetime : NO

EPA Codes : D001 D002 D018 D026 D035 D039 D040 F003 F005 U001 U002 U003 U019 U031 U079 U117 U122 U159 U162 U165 U196 U213 U220 U239

Disposal TSD : ARD981057870 IND093219012 NED981723513 TND000772186 TXD055141378 ARD069748192 KSD007246846 KSD980633259 LAD981057706 MOD980962849 MOD981505555 TND991279480 TXD000838896 TXD055135388 TXD980624035 OHD980613541 OHD083377010

Comments :

Stream No : 474 **WASTE HALOGENATED SOLVENTS**

Onetime : NO

EPA Codes : D019 D039 D040 F001 F002 U080 U210

Disposal TSD : ARD981057870 NED981723513 TND000772186 TXD055141378 ARD069748192 KSD007246846 KSD980633259 LAD981057706 MOD980962849 TND991279480 TXD000838896 TXD055135388 TXD980624035 OHD980613541

Comments :

Stream No : 478 **EQUIP. WASH-SOLVENTS**

Onetime : NO

EPA Codes : D004 D005 D006 D007 D008 D009 D010 D011

Disposal TSD : ARD981057870 LAD010395127 NED981723513 TXD055141378 OKD000402396 ARD069748192 KSD007246846 LAD981057706 MOD980962849 TND981922826 TXD000838896 TXD055135388 TXD980624035

Comments :

Stream No : 1997 **MISC. LAB PACKS - HAZARDOUS**

Onetime : NO

EPA Codes : D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011 D012 D013 D014 D015 D016 D017 D018 D019 D020 D021 D022 D023 D024 D025 D026 D027 D028 D029 D030 D031 D032 D033 D034 D035 D036 D037 D038 D039 D040 D041 D042 D043 F003 F005 P034 P009 P041 P039 P044 P043 P027 P008 P023 P058 P002 P003 P005 P006 P007 P010 P011 P012 P038 P036 P054 P013 P024 P028 P014 P060 P016 P050 P059 P001 P015 P017 P018 P045 P021 P022 P029 P030 P033 P040 P004 P037 P046 P047 P048 P020 P049 P051 P042 P031 P056 P057 P026 P062 P063 P064 P065 P066 P067 P068 P069 P070 P071 P072 P073 P074 P075 P076 P077 P078 P081 P082 P084 P085 P087 P088 P089 P092 P093 P094 P095 P096 P097 P098 P099 P101 P102 P103 P104 P105 P106 P108 P109 P110 P111 P112 P113 P114 P115 P116 P118 P119 P120 P121 P122 P123 P127 P128 P185 P188 P189 P190 P191 P192 P194 P196 P197 P198 P199 P201 P202 P203 P204 P205 U001 U002 U003 U004 U005 U006 U007 U008 U009 U010 U011 U012 U014 U015 U016 U017 U018 U019 U020 U021 U022 U023 U024 U025 U026 U027 U028 U029 U030 U031 U032 U033 U034 U035 U036 U037 U038 U039 U041 U042 U043 U044 U045 U046 U047 U048 U049 U050 U051 U052 U053 U055 U056 U057 U058 U059 U060 U061 U062 U063 U064 U066 U067 U068 U069 U070 U071 U072 U073 U074 U075 U076 U077 U078 U079 U080 U081 U082 U083 U084 U085 U086 U087 U088 U089 U090 U091 U092 U093 U094 U095 U096 U097 U098 U099 U101 U102 U103 U105 U106 U107 U108 U109 U110 U111 U112 U113 U114 U115 U116 U117 U118 U119 U120 U121 U122 U123 U124 U125 U126 U127 U128 U129 U130 U131 U132 U133 U134 U135 U136 U137 U138 U140 U141 U142 U143 U144 U145 U146 U147 U148 U149 U150 U151 U152 U153 U154 U155 U156 U157 U158 U159 U160 U161 U162 U163 U164 U165 U166 U167 U168 U169 U170 U171 U172 U173 U174 U176 U177 U178 U179 U180 U181 U182 U183 U184 U185 U186 U187 U188 U189 U190 U191 U192 U193 U194 U196 U197 U200 U201 U202 U203 U204 U205 U206 U207 U208 U209 U210 U211 U213 U214 U215 U216 U217 U218 U219 U220 U221 U222 U223 U225 U226 U227 U228 U234 U235 U236 U237 U238 U239 U240 U243 U244 U246 U247 U248 U249 U271 U278 U279 U280 U328 U353 U359 U364 U367 U372 U373 U387 U389 U394 U395 U404 U409 U410 U411 U408

Disposal TSD : ARD981057870 IND093219012 NED981723513 TND000772186 TXD055141378 OKD065438376 ARD069748192 KSD007246846 LAD981057706 MOD980962849 TXD055135388 TXD980624035 OHD980613541 OHD083377010

Comments : OHD980613541 does not display

Stream No : 7644 **PAINT-RELATED MATERIALS**

Onetime : NO

EPA Codes : D001 D007 D008 D018 F003 F005

Disposal TSD : ARD981057870 NED981723513 TND000772186 TXD055141378 ARD067671313 ARD069748192 KSD007246846 MOD981505555 TND991279480 TXD000838896 TXD055135388 TXD980624035

Comments :

Stream No : 18600 **CORROSIVE LIQUID**

Onetime : NO

EPA Codes : D001 D002 D004 D005 D006 D007 D008 D009 D010 D011 P102

Disposal TSD : ARD981057870 IND093219012 NED981723513 TND000772186 TXD055141378 OKD065438376 OKD000402396 ARD069748192 TXD000838896 TXD055135388 TXD069452340 TXD980624035 OHD980613541 OHD083377010

Comments : OFF-SPEC CHEMICALS.

Stream No : 18631 **OXIDIZING SOLIDS AND LIQUIDS**

Onetime : NO

EPA Codes : D001 D002 D003 D011 D035 U160

Disposal TSD : ARD981057870 IND093219012 NED981723513 TND000772186 TXD055141378 OKD000402396 ARD069748192 KSD007246846 TXD000838896 TXD055135388 TXD069452340 TXD980624035 OHD980613541

Comments : OFF-SPEC PRODUCTS.

Stream No : 25764 **FLAMMABLE CORROSIVE LIQUIDS**

Onetime : NO

EPA Codes : D001 D002 U009 U404

Disposal TSD : TND000772186 ARD069748192

Comments :

Stream No : 26620 **ENVIRONMENTALLY HAZARDOUS LIQUIDS**

Onetime : NO

EPA Codes : D007 D023 D025 D026 U102 U122 U223 U404

Disposal TSD : ARD981057870 TND000772186

Comments :

Stream No : 480 **Contaminated Solids**

Onetime : NO

EPA Codes : D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011 D019 D022 D023 D024 D035 D036 D039 P075 P076 P205 U012 U044 U068 U070 U080 U115 U122 U125 U147 U158 U169 U188 U201 U210 U211 U219 U244 U328

Disposal TSD : ARD981057870 IND093219012 TND000772186 TXD055141378 TXD982290140 OKD065438376 OKD000402396 ARD069748192 KSD007246846 TXD000838896 TXD055135388 OHD980613541

Comments :

Total number of waste streams : 10

ODEQ NHIW Certification

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

NHIW CERTIFICATION

Please read instructions prior to completing this form.

Generator Name: Environmental Management, Inc.

Mailing Address: P.O. Box 700 **City** Guthrie **State** OK **Zip** 73044

Point of Generation Address: 5200 NE Highway 33 **City** Guthrie **State** OK **Zip** 73044

Generator Contact: Terry D. Bobo **Title** President **Telephone** 405-282-8510

DETAILED WASTE DESCRIPTION

Waste Name: Nonhazardous Solids

If waste was generated out-of-state, is it classified as hazardous in the state of origin? [ ] Yes [ ] No [X] NA- Okla. waste

Approximate amount of waste to be disposed:

120

[ ] Tons [ ] Pounds
[X] Cubic yards [ ] Drum
[ ] Other _____

Disposal frequency:

[ ] One-time [ ] Weekly
[X] Monthly [ ] Annually

Physical characteristics:

[X] Solid [ ] Liquid
[ ] Sludge [ ] Combination

Method used to determine waste is non-hazardous: [ ] Analysis [X] Generator knowledge [ ] Both

Process generating waste (be specific and use additional sheets if necessary):

Consolidation of nonhazardous solids, petroleum contaminated solids, and nonhazardous liquids that are solidified with flyash

DESIGNATED RECEIVING LANDFILL

Name: Northern Oklahoma Disposal **Permit #:** 3552011

GENERATOR CERTIFICATION

I understand this form must be signed by the original waste generator or other persons authorized by 27A O.S. §2-10-501(H).

To the best of my knowledge, I certify:

- **The information contained herein is accurate, complete, and representative of the waste to be disposed;**
- **The waste identified above is not a characteristically hazardous waste as identified by 40 CFR 261, Subpart C, is not a listed hazardous waste as identified by 40 CFR 261, Subpart D or contaminated with a listed hazardous waste, and is not otherwise identified as a hazardous waste by the Department of Environmental Quality; and**
- **This waste will be managed in accordance with all applicable statutes and rules of the Department of Environmental Quality.**

Terry D. Bobo

Generator Signature

Terry D. Bobo	President	5/18/17
Printed name	**Title**	**Date**

Adopted June 2003

DEQ Form # 515-860

OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY

NHIW CERTIFICATION

Please read instructions prior to completing this form.

Generator Name: Environmental Management, Inc. / Various Customers

Mailing Address: 5200 NE Hwy 33 City Guthrie State OK Zip 73044

Point of Generation Address: Various Locations City Various State OK Zip

Generator Contact: Scott T. Ketman Title ER Coordinator Telephone 405-282-8510

DETAILED WASTE DESCRIPTION

Waste Name: Drill cutting from Oilfield Services E&P waste

If waste was generated out-of-state, is it classified as hazardous in the state of origin? [ ] Yes [x] No [ ] NA- Okla. waste

Approximate amount of waste to be disposed: 100

[x] Tons [ ] Pounds [ ] Cubic yards [ ] Drum [ ] Other

Disposal frequency: [x] One-time [ ] Weekly [x] Monthly [ ] Annually

Physical characteristics: [x] Solid [x] Sludge [x] Liquid [ ] Combination

Method used to determine waste is non-hazardous: [ ] Analysis [x] Generator knowledge [ ] Both

Process generating waste (be specific and use additional sheets if necessary):
Drill Cuttings from Oilfield Services, E&P Waste

DESIGNATED RECEIVING LANDFILL

Name: Oklahoma Landfill - OKC Permit #: 3555018

GENERATOR CERTIFICATION

I understand this form must be signed by the original waste generator or other persons authorized by 27A O.S. §2-10-501(H).

To the best of my knowledge, I certify:

- The information contained herein is accurate, complete, and representative of the waste to be disposed;
- The waste identified above is not a characteristically hazardous waste as identified by 40 CFR 261, Subpart C, is not a listed hazardous waste as identified by 40 CFR 261, Subpart D or contaminated with a listed hazardous waste, and is not otherwise identified as a hazardous waste by the Department of Environmental Quality; and
- This waste will be managed in accordance with all applicable statutes and rules of the Department of Environmental Quality.

Generator Signature

Scott T. Ketman	ER Coordinator	3/3/14
Printed name	Title	Date

Adopted June 2003 DEQ Form # 515-860

OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY

NHIW CERTIFICATION

Please read instructions prior to completing this form.

Generator Name: Environmental Management, Inc.

Mailing Address: P.O. Box 700 City Guthrie State OK Zip 73044

Point of Generation Address: 5200 N.E. Highway 33 City Guthrie State OK Zip 73044

Generator Contact: Terry D. Bobo Title President Telephone 405-282-8510

DETAILED WASTE DESCRIPTION

Waste Name: Nonhazardous Industrial Solids

If waste was generated out-of-state, is it classified as hazardous in the state of origin? [ ] Yes [ ] No [x] NA- Okla. waste

Approximate amount of waste to be disposed: 80

[ ] Tons [x] Cubic yards [ ] Other _____ [ ] Pounds [ ] Drum

Disposal frequency: [ ] One-time [ ] Weekly [x] Monthly [ ] Annually

Physical characteristics: [ ] Solid [ ] Sludge [ ] Liquid [ ] Combination

Method used to determine waste is non-hazardous: [ ] Analysis [x] Generator knowledge [ ] Both

Process generating waste (be specific and use additional sheets if necessary):
Consolidation of nonhazardous solids from clients. Solidification with flyash of nonhazardous liquids determined by MSDS review.

DESIGNATED RECEIVING LANDFILL

Name: Waste Connections Oklahoma City Landfill Permit #: 3555018

GENERATOR CERTIFICATION

I understand this form must be signed by the original waste generator or other persons authorized by 27A O.S. §2-10-501(H).

To the best of my knowledge, I certify:

- The information contained herein is accurate, complete, and representative of the waste to be disposed;
- The waste identified above is not a characteristically hazardous waste as identified by 40 CFR 261, Subpart C, is not a listed hazardous waste as identified by 40 CFR 261, Subpart D or contaminated with a listed hazardous waste, and is not otherwise identified as a hazardous waste by the Department of Environmental Quality; and
- This waste will be managed in accordance with all applicable statutes and rules of the Department of Environmental Quality.

Terry D Bobo
Generator Signature

Terry D. Bobo — President — 8/28/12
Printed name — Title — Date

Adopted June 2003

DEQ Form # 515-860

J:\worddocs\forms\profiles&application\NHIW disposal request Form

ATTACHMENT 27

- AESTHETIC ENHANCEMENTS TO THE EMI FACILITY

Environmental Management, Inc.
"For an environment we can all live with today & tomorrow."

May 10, 2001

Mr. Oral Saulters
Land Protection Division
Oklahoma Department of Environmental Quality
PO Box 1677
Oklahoma City, OK 73101-1677

Dear ~~Mr. Saulters~~ ORAL:

During development of E.M.I.'s Transfer Station application, reference was made to future plans for aesthetic enhancement at the facility. The construction along Highway 33 prevented improvements at the time but E.M.I. indicated a commitment to plant trees along the fence line once the easement and highway construction was completed. That commitment has been fulfilled. E.M.I. has planted 20 trees along the fence line and has with this years Arbor Day planted a Red Oak in the area just to the north of the main office. The Red Oak planted near the office was planted in honor of long time treasurer Robert L. Nichols. E.M.I. plans to plant another tree in this area every year on Arbor Day until it becomes a "Grove."

Pictures of the plantings along with copies of articles from both our newsletter and from the Guthrie News Leader depicting this event are included. Please feel free to call me if you have any questions. It seems to have been awhile sine we have had a chance to talk so I hope things are still going well for you and your family both professionally and personally.

Sincerely,

Robert A. Rabatine

Robert A. Rabatine
Regulatory Affairs

c. Terry Bobo

E.M.I.
Post Office Box 700
Guthrie OK 73044-0700
(405) 282-8510
www.emiok.com

Close up—Facing Southeast

Wide Angle of Fence Line Facing South from Entrance

Wide Angle of Fence Line Facing East from Entrance

Flower Bed at Office Building

Pond—Facing South from Office Building

Arbor Day Celebration Starts a Yearly Tradition

On April 27th, a Shumard Red Oak tree was planted in the area between the office building and the Truck Barn. This area has long been imagined as a picnic/lunch area and now this will be a reality. Emi Grove (pronounced "emmy") will become an area of quiet relaxation for all employees to enjoy.

The Oak tree was planted in honor of Mr. Nichols, who has been with E.M.I. since the first day of business. His guidance has been a key part of our success. A reception was held immediately following the speeches by Carl Barry and Mr. Nichols. Cake and punch were served.

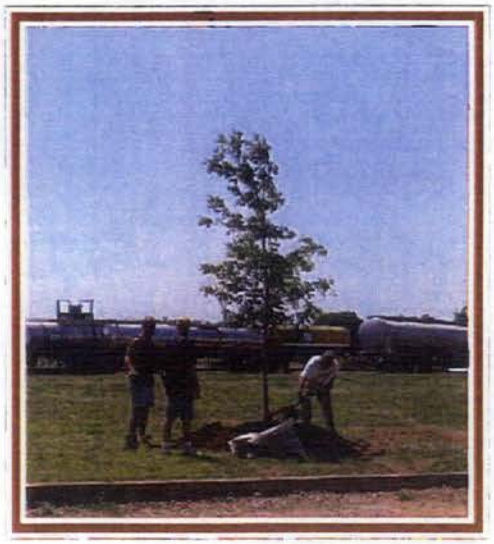
April 27th was chosen because it was National Arbor Day. Each year on Arbor Day, a ceremony will be held in which a new tree will be planted in honor of a person or in celebration of an event which has significantly affected Environmental Management, Inc. Guthrie is a Tree City USA and has developed a new urban forest project through the Guthrie Forestry Advisory Board, and they were happy to see E.M.I. joining the effort.

In addition to the honor tree, a donation was made to the National Arbor Day Foundation and 10 Douglas Fir and/or Lodgepole Pine trees will be planted in Mr. Nichols' name in Caribou—Targhee National Forest in the greater Yellowstone area. The Targhee was devastated by fire and the mountain pine beetle last year and the National Arbor Day Foundation is reforesting the whole area. This area is home to over 300 species of nesting birds including Sandhill Cranes, one of the largest known wintering concentration of Trumpeter Swans, Bald and Golden Eagles, hawks, ospreys, and the endangered Peregrine Falcon. This donation will be made each year in the name of the person or event.

A plaque will be in the lobby with each year's recipient and the type of tree planted.

It's a long way from being a grove, but with a little work and time, it will be! We hope everyone will use and enjoy Emi Grove!

Mr. Nichols was very happy to be the first recipient of an "Emi" tree.



Everyone had a great time at the ceremony and reception.

Guthrie NEWS LEADER

FIFTY CENTS

SUNDAY, APRIL 29, 2001

Andrew Kirkpatrick / Guthrie News Leader

Bob Nichols of EMI receives a plaque Friday in recognition of the Shumard red-oak planted in his honor. For more info, see page 2.

EMI plants trees

NEWS LEADER STAFF

Environmental Management, Inc. honored a longtime employee and began a new beautification initiative all in one fell swoop Friday.

A Shumard red oak was planted on EMI's property in honor of longtime EMI treasurer Robert L. Nichols.

EMI plans to plant a tree each year on Arbor Day until it has an "Emmi grove."

In addition, the company also planted 20 trees along the front side of the property.

EMI is the first business in Guthrie to partner with the Guthrie Forestry Advisory Board for a new urban forest project.

The project's idea came from the Up with Trees program in Tulsa.

"That's why Tulsa looks the way it does, and I'd like to see Guthrie do that," FAB member Sue Durkee said.

ATTACHMENT 28

- EMI FACILITY CLOSURE COST ESTIMATE & FINANCIAL ASSURANCE

Facility Closure Cost Estimate
&
Financial Assurance for Closure and Liability Requirements

1.0 CLOSURE PLAN COST ESTIMATE

1.1 Introduction

In accordance with 40 CFR 264.142 and the ODEQ Rules and Regulations for Hazardous Waste Management (252:205-3-1), EMI must have a detailed written estimate, in current dollars of the cost of closing the Transfer Station portion of the Facility in accordance with the approved closure plan. The certificate of deposit which secures these monies continues to be held in trust by Exchange Bank in Perry, Oklahoma.

1.2 Basis for Closure Cost Estimate

The following closure cost estimate is based on 2018 dollars at the point in the life of the Transfer Station when the extent and manner of its operation would result in the most expensive closure. The Transfer Station is also assumed to contain the maximum waste inventory at the time of closure, as stated in the closure plan (See 2.2.15 of the 2018 D&O Plan). The closure cost estimate is based on the costs to EMI associated with the hiring of a third party to implement and complete the closure activities specified in the Closure Plan.

1.3 Annual Adjustment to Closure Cost Estimate

During the active life of the facility, EMI will adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial assurance mechanism. The cost will be adjusted using an inflation factor derived from the Implicit Price Deflator for Gross Nation Product, or other appropriate measure as defined by DEQ.

1.4 Adjustment to Closure Cost Estimate Due to EMI D&O Plan Modifications

In the event that modifications to the EMI D&O Plan result in an increase in the cost of closure, EMI will revise the closure cost estimate within 30 days, following ODEQ approval of the modified plan. The revised cost estimate will then be adjusted for inflation annually.

1.5 Retention of Closure Cost Estimate Documents

EMI will maintain the current closure cost estimate, as revised or adjusted, at the EMI Corporate Facility office. The most recent correspondence between DEQ and EMI associated with the cost closure bond requirement is provided as an attachment to this document. The most recent EMI Facility Closure cost breakdown is presented in Table 1 below.

Table 1. Facility Closure Cost Estimate Breakdown

EMI TRANSFER STATION FACILITY CLOSURE COST ESTIMATE				
Item / Activity	**Quantity**	**Units**	**Cost /Unit**	**Total Cost**
A. Notification to ODEQ				
Task: Prepare notification letter & Amendments to Closure Plan.				
1 person x 8 hours x $40.00/hour	8	Man Hrs	$40	$ 320.00
		Task Subtotal		**$ 320.00**
B Removal of Waste from Station				
Task: Waste Removal, Transportation & Disposal Costs.				
Nonhazardous Waste (Nonhaz Staging Area) 420 Drum	73.5	Ton	$48.50	$3,565.00
Hazardous Waste (Dock 2 incl. Universal)	100	Drum	$135	$13,500.00
VSQG Waste (Mix Room)	25	Drum	$135	$3,375.00
Universal Waste Light Bulbs (Bldg 5) (7000 bulbs)	1	ea	$3500	$3,500.00
Nonhazardous bulk waste (Rolloffs & Tank 1)	240	tons	$48.50	$11,640.00
Nonhazardous bulk waste (Recyclable Plastics & Metals) 120 yd^3 @ 0.29 tons/yard	35	tons	$26.00	$ 910.00
Nonhaz Liq Used Oil; Oil/Water Mix; Wash Water (Tank 3, 4, 7, 12, 13)	16,000	Gal	$0.40	$6,400.00
		Task Subtotal		**$42,890.00**
C Dismantle/Dispose Equipment				
Task: Dismantle & dispose of contaminated equipment & fixtures, etc. Assume 30 tons of debris will require transportation/disposal.				
(2 loads @ 60 miles) @ $2.50/mile (15 tons each trip)	120	Mi	$2.50	$ 300.00
30 tons @ $12.00/ton	30	Tons	$12	$ 360.00
Task: Labor crew for dismantling and loading debris				
2 persons x 40 hours x $25/hour	80	Man Hrs	$25	$2,000.00
		Task Subtotal		**$2,660.00**
D. Decontamination				
Task: Decontaminate floors, walls, equipment, etc., using brushes, scrapers, and steam cleaner, etc. Assumes labor crew has their own equipment, and need to decontaminate Buildings 2, 3, 5; NonHaz Staging Area, & Docks 1, 2.				
2 persons x 80 hours x $25/hour	160	Man Hrs	$25	$4,000.00
Task: Collect residues and rinse water in drums. Assumes 2000 Gal will require transportation/disposal				
40 drums x $45.00/drum	40	Drum	$45	$1,800.00
1 load 60 miles @ $2.50/mile	60	Mile	$2.50	$ 150.00
Task: Collect rinse water samples and analyze				
6 samples @ $300/sample	6	Sample	$300	$1,800.00
Task: Collect soil samples and analyze				
10 samples @ $300/sample	10	Sample	$300	$3,000.00
		Task Subtotal		**$10,750.00**
E. Closure Certification				
Task: Prepare final closure report and prepare owner certification				
1 person x 25 hours x $40/hour	25	Man Hrs	$40	$1,000.00
Task: Independent registered PE certification, then submit to ODEQ				
1 person x 8 hours x $100/hour	8	Man Hrs	$100	$ 800.00
		Task Subtotal		**$1,800.00**

EMI TRANSFER STATION FACILITY CLOSURE COST ESTIMATE (cont.)				
Item / Activity	**Quantity**	**Units**	**Cost /Unit**	**Total Cos**
F Task Summary of Cost Estimate & Contingency				
Notification				$320.00
Removal of Waste, Transport & Disposal				$42,890.00
Dismantle/Dispose Structures/Equipment				$2,660.00
Decontamination				$10,750.00
Certification				$1,800.00
Contingency and Miscellaneous Adder (10%)				$5,842.00
Estimate Total				**$64,262.00**

Closure Cost Estimate and Actual Trust Value

Date	Closure Cost Estimate	Annual Inflation Factor		Updated Cost Estimate	Actual Trust Value	Comments
Jan-01	37,351.00	N/A		37,351.00	38,000.00	
Jan-02	37,351.00	2.16%	806.78	38,157.78	40,331.81	
Jan-03	38,157.78	1.31%	499.87	38,657.65	42,806.71	
Jan-04	38,657.65	1.63%	630.12	39,287.77	45,433.47	
Jan-05	39,287.77	2.10%	825.04	40,112.81	48,229.24	
Jan-06	44,730.76	2.63%	1,176.42	45,907.18	41,167.78	CD Reduced by $10,020.98 per 01/09/06 DEQ Letter
Jan-07	45,907.18	2.93%	1,345.08	47,252.26	43,073.12	Add'l CD on 05/30/07 for$3,700.00 to cover Bldg #5
Jan-08	47,252.26	2.66%	1,256.91	48,509.17	45,066.65	
Jan-09	48,509.17	2.12%	1,028.39	49,537.56	49,800.00	CD Reduced by $1374.90 per 01/22/09 DEQ Letter
Jan-10	49,537.56	1.19%	589.50	50,127.06	50,904.66	
Jan-11	50,127.06	0.95%	476.21	50,603.27	51,775.58	
Jan-12	50,603.27	2.10%	1,062.67	51,665.94	52,582.78	
Jan-13	51,665.94	1.76%	909.32	52,575.26	53,058.93	
Jan-14	52,575.26	1.49%	783.37	53,358.63	53,458.00	
Jan-15	53,358.63	1.44%	768.36	54,126.99	55,198.97	Added $1500.00 to Closure Bond
Jan-16	54,126.99	0.99%	535.86	54,662.85	55,447.54	
Jan-17	54,662.85	1.32%	721.55	55,384.40	55,753.98	49,086.77
Jan-18	55,384.40	1.02%	564.92	55,949.32	56,089.24	

Notes:
(1) Closure Cost Estimate was increased January 2006 to include $4,617.95 for Bldg #5
(2) Annual Inflation Factor - http://www.deq.state.ok.us/lpdnew/ipd.htm

Bryan Cline

From: Bartlett, Carol <Carol.Bartlett@deq.ok.gov>
Sent: Friday, August 26, 2016 3:43 PM
To: Bryan Cline
Subject: Financial Assurance - Inflation Adjustement
Attachments: Cost Estimate inflation-adjusted calculations through 2016.xls

Bryan:

Please see the attached Excel file with inflation-adjusted calculations through 2016, for Environmental Management, Inc. EPA ID No. OKD982293334. I have calculated the 2016 Closure Cost at $49,086.77.

Also, for DEQ's files, please provide a current balance statement from Exchange Bank & Trust Company, confirming the current balance.

Thank you for visiting with me today on the phone.

Carol Bartlett, Env. Prog. Specialist
Oklahoma Department of Environmental Quality
Land Protection Division
707 North Robinson, P.O. Box 1677
Oklahoma City, OK 73101-1677

(405) 702-5109
Carol.bartlett@deq.ok.gov