

CEICC

**COX ENERGY, INDUSTRIAL COATINGS &
CLEANING, LLC**

ENVIRONMENTAL SAFETY & HEALTH MANUAL

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1. INTRODUCTION

1. INTRODUCTION:

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC's ("CEICC") most valuable assets are the employees whose efforts have enabled us to achieve the level of success we enjoy today. The safety and well-being of each and every employee is the most important element in protecting that asset. Consequently, CEICC is committed to equipping employees to perform their assigned tasks safely. The safety program cannot be successful without active participation by all of its employees. As a valued employee, you should know your responsibilities so that you are able to work safely, and if you see coworkers performing unsafe acts, you can remind them that safety is a top priority. The "Employee Safety Handbook" gives you a quick reminder of the many elements of the safety program and sets the general rules that all employees must follow. However, this handbook does not contain all requirements of the safety and health program. For complete safety and health program requirements, refer to this "Environmental Health & Safety Manual" which is maintained by the Environmental Safety & Health Department.

A. GOVERNING DOCUMENTS:

The following materials constitute the governing documents of the Cox Energy, Industrial Coatings & Cleaning, LLC Environmental, Safety and Health Program for all Construction Projects performed under contract with COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC as the Construction Manager. These materials shall supersede and take precedence over any and all contrary terms and requirements of any prior environmental, safety and health programs issued to date on any existing Cox Energy, Industrial Coatings & Cleaning, LLC projects performed under contract and control of COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC as Construction Manager.

B. SAFETY CULTURE POLICY STATEMENT:

Background

Safety culture is how a company and those working for it behave in the pursuit of safety. It is the product of individual and group beliefs, values, attitudes, perceptions, competencies, and patterns of behavior that determine the organization's commitment to quality and safety.

Definition

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC is committed to a positive safety culture where safety is paramount. We define

our safety culture as the core values and behaviors resulting from a collective commitment by leaders and individuals to emphasize safety over competing goals, such as production or costs, to ensure a safety-first focus and protection of people and the environment. We believe in prioritizing safety through shared values, attitudes, and behaviors, rather than just compliance.

Key Components to Our Safety Culture

Construction safety encompasses many aspects of construction work, ranging from pre-project preparation to post-project management. Some of our key components for ensuring safety are the following:

Safety Culture and Leadership: Our leaders, who are trained to understand the value of safety in the workplace, set expectations and empower workers through clear policies and visible engagement.

Safety Training: We hold regular safety training for all employees, including leaders and workers, on general hazards, equipment use, material maintenance, and emergency procedures. We use this training to ascertain that all workers understand the risks and best practices for mitigating hazards.

Emergency Planning: We established and regularly updating emergency response plans ensures preparedness for accidents, medical emergencies, and site evacuations.

Safety Protocols and Hazard Controls: On our construction sites and controlled access zones, we require documented safety protocols for preventing falls, managing electrical work, handling scaffoldings , and controlling struck-by hazards.

Personal Protective Equipment (PPE): We require that our employees wear the right PPE, and make it mandatory for visitors to protect everyone against common hazards.

Equipment and Worksite Safety: We require regular inspection, upkeep, and safe handling of tools and machinery in order to prevent injuries and accidents.

Risk Assessment: We train our leadership and employees to identify hazards and implement controls.

Incident Reporting and Management: We require all leadership and employees to timely report hazards, near misses, and incidents which help us respond quickly and refine our safety processes.

Continuously Building a Better and Stronger Safety Culture

This safety culture policy statement is just the beginning. We are continuing to develop our safety culture by:

Leadership Engagement: Active involvement from management to promote a "safety-first" mindset.

Employee Empowerment: Encouraging workers to report hazards, speak up about risks, and participate in safety committees.

Clear Communication: Ensuring all personnel, including other contractors and visitors, are aware of and comply with the policy.

Proactive Approach: Using tools like tool box talks and promoting a "no-blame" culture.

Conclusion

We promote our safety culture by, among many other things, open communication, accountability, training, and continuous improvement. Every person working for the company is responsible for maintaining a safe, secure, and respectful work environment. We encourage a questioning attitude and promise to support an environment free from retaliation when raising concerns

C. SAFETY POLICY STATEMENT:

a. Mission:

CEICC and its employees will fully integrate Occupational Safety and Health Administration (OSHA) excellence into its business and related operations planning and decision making to achieve superior health and safety performance. Simply stated: Safe production is the Company's only standard! Policy CEICC will manage its operations in accordance with our OSHA principles and beliefs, in a manner that helps to control occupational safety and health risks, protects the environment, while fully complying with applicable laws and regulations.

b. Principles & Beliefs:

The management philosophy of CEICC is to produce superior value for our customers. CEICC's management philosophy is also its environmental health and safety philosophy. Employees of CEICC will be innovative and entrepreneurial in offering systems and

services that return economic value, while at the same time protect all workers of hazards. Only through this management philosophy can CEICC sustain business growth, serve its customers, and effectively benefit the world around us. The OSHA principles and beliefs are intended to guide the actions of CEICC and its employees of developing, designing and systems and services that provide needed services to our customers. OSHA must come first, no matter how urgent the job. A healthy and safe work environment for all employees and contractors is essential for the success of its business. We believe that all incidents are preventable through the application of proper training, planning, knowledge, and resources to identify and control safety risk.

c. Personal Commitment:

Only employees and contractors with the highest commitment to health and safety, environmental protection, and compliance will work for CEICC. All employees must take personal responsibility to work safely and show concern for the health and safety of their coworkers, contractors, customers, and communities. CEICC is committed to serving its customers.

d. Open Door Policy:

Since many issues may be the result of misunderstandings and lack of communication, Cox Energy, Industrial Coatings & Cleaning, LLC ("CEICC") encourages an open line of communication between you and your supervisor. The basic steps most helpful in addressing your concerns, in an environment conducive to problem solving are as follows:

- Under normal conditions, if you have a job-related problem, question or complaint, you should discuss it with your supervisor. The simplest, quickest, and most satisfactory solution will often be reached at this level.
- If the discussion with your supervisor does not answer your question or resolve the matter to your satisfaction, you may continue your discussion with your supervisor's manager. Your supervisor can make these arrangements for you.
- If you still feel the problem requires further consideration, please direct your concerns to the Company President, and your matter will be given prompt attention. When the issue involves

the supervisor or manager with whom you would ordinarily discuss the problem, you may bypass that individual and proceed to the next person in authority without fear of reprisal

e. Equal Opportunity Policy:

CEICC maintains a policy of nondiscrimination with employees and applicants for employment and advancement opportunities. Employment decisions will be based on merit, qualifications and abilities. CEICC provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability, or status as a Vietnam-era or special disabled veteran in accordance with applicable state and federal laws. This policy applies to all terms and conditions of employment including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training. CEICC expressly prohibits any form of unlawful employee discrimination and/or harassment based on race, color, religion, sex, national origin, age, disability, status as a Vietnam-era or special disabled veteran or status in any group protected by state, federal or local law. This policy governs all aspects of employment, including employee selection, promotion, discipline, termination, compensation and eligibility of benefits.

f. Zero Tolerance Harassment Policy:

Employers interested in human dignity and protection of their employees are particularly concerned about the possibility of employee harassment, whether sexual, racial, ethnic, or other type. Harassment in any form- verbal, physical, or visual- is strictly against company policy and will result in corrective action. It is illegal and against CEICC's policy for any employee, male or female, to harass another employee in the following manner:

- Making unwelcome sexual advances or favors or other verbal or physical conduct of a sexual nature, a condition of any employee's employment;
- Using an employee's submission to, or rejection of such sexually harassing conduct as the basis for, or as a factor in any employment decision affecting the individual; or
- Otherwise creating an intimidating, hostile or offensive work environment by such sexually harassing conduct. Defining

sexual harassment precisely is not easy but it certainly includes slurs, threats, derogatory comments, unwelcome jokes, exposure to sexually oriented literature or pictures, teasing or sexual advances, and other similar verbal or physical conduct. CEICC will not condone nor permit any sexual harassment of its employees. All employees, including supervisors and managers, will be subject to severe discipline, up to and including discharge, for any act of sexual harassment which they commit. An employee who believes that he/she is or may be subjected to objectionable conduct must report it immediately in writing. Do not allow an inappropriate situation to continue without reporting it, regardless of who is creating the situation. No employee is exempt from this policy. It is the responsibility of the employee to immediately report any sexual harassment, in writing, to his/her supervisor. If the employee's immediate supervisor is the cause of the harassment, the employee is to report the problem immediately to the supervisor's superior. When a supervisor or manager receives a sexual harassment complaint, he/she is to carefully investigate the matter. Each member of management is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. However, if after investigating any complaint of harassment or unlawful discrimination, the company determines that the complaint is not bona fide or that an employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or provided the false information. Furthermore, no employee shall be subject to any form of retaliation or discipline for pursuing a legitimate sexual harassment complaint.

g. Workplace Violence Policy:

No workplace violence will be tolerated. CEICC will not condone nor permit any type of workplace violence of its employees. All employees, including supervisors and managers, will be subject to discipline, up to and including termination, for any act of workplace violence which they commit. It is the responsibility of the employee to immediately report any workplace violence, in writing, to his or her supervisor. If the employee's immediate supervisor is the source of workplace violence, the employee is to report the problem immediately to the supervisor's superior. When a supervisor or manager receives a workplace violence complaint, he is to carefully

investigate the matter. An employee who is not satisfied with the results of the investigation should then go to the supervisor's superior. No employee will be subject to any form of retaliation or discipline for pursuing a workplace violence complaint.

h. Absenteeism or Tardiness Policy:

An employee must call Human Resources and/or supervisor by 8:00 a.m. if he/she will not be able to report to work for any reason. Anyone who expects to leave the office early, arrive late or to be away from the office for an extended period during the day must inform Human Resources and/or his/her supervisor, must complete a Request for Leave Form, and must give the completed Request for Leave Form to his/her Supervisor or to Human Resources. If an employee does not appear for work and the employee has not contacted Human Resources and/or supervisor for more than two (2) continuous days, the employee will be considered to have resigned.

i. Solicitation Policy:

No solicitation will be allowed to or by employees while performing work for CEICC.

j. Cell-Phone Policy:

Company cell phones are only to be used to the extent that they relate to or are in furtherance of company business. Cell phones are to be used in a professional manner and are not to be used in ways that are disruptive or offensive to others or in ways that could otherwise be harmful to the workplace. Any employee driving a company vehicle while using a cell phone must have the appropriate equipment (i.e. hands-free cradle and/or earpiece). Proper and professional phone etiquette is expected on each and every cell phone call. Use and access to company cell phones is restricted and limited to employees of the company or such other persons as the company may authorize. The cell phone shall not be used for any communication containing ethnic slurs, racial epithets or anything that may be construed as offensive, harassing or disparaging to others based on their race, religion, national origin, sex, age or disability. Employees are expected to follow all applicable federal and state laws, regulations, and policies relating to the use of cell phones. CEICC reserves the right to monitor the use of each company cell phone for possible misuse. Further, CEICC assumes no responsibility and will assume no liability for an employee's misuse of these phones. However, it does reserve the right to terminate an employee immediately for

improper use of a company cell phone. Immediately, upon separation of employment, the Employee must return to the Company its cell phone. Personal cell phone use is prohibited during working hours and while driving a company vehicle. Employees cannot accept or make calls from their personal cell phones while working and/or while driving a company vehicle. This includes texting, emailing, etc. You will have an opportunity during your lunch break to check any messages and to make personal phone calls. We understand that personal phone calls are sometimes necessary; however, they should be kept to a minimum and abuse of this policy will result in corrective action.

k. Computer/E-Mail/Internet/Voice Mail/Fax Policy:

Company equipment, including computer software, is a valuable asset. They shall be used for Company business only. You may not copy or use Company purchased software contrary to the provisions of the software contract. From time to time, especially when you are on vacation or leave of absence, another authorized employee may need access to your computer or files to better serve our customers and other business needs. You should not expect information left on your computer or files to be totally private. You are not permitted to access or attempt to access information that does not directly relate to your job responsibilities. A password is our only protection about unauthorized access from within and outside the company. Sharing passwords is against Company policy and only the System Administrator can change passwords. The Internet is a tool to be used for Company business. The e-mail system is for conducting Company business only. All e-mail is company property and is subject to review and content filtering by company management. All electronic communication systems (Computer/E-Mail/Internet/Voice Mail) and information transmitted by, received from, or stored in E-Mail, Internet or Voice Mail is the property of CEICC. E-Mail, Internet and Voice Mail are to be used solely for job related purposes and all employees are hereby notified that they have no expectation of privacy in connection with the use of E-Mail, Internet or Voice Mail. This policy is also to notify all employees that they are not to use a code, access a file or retrieve any stored communication unless specifically authorized to do so. Also, no software is to be loaded onto the Company computers. This policy is also to notify employees that CEICC has the right to monitor the use of this equipment at all times, which would include printing or reading of all E-Mail, Internet

and Voice Mail files. E-Mail, Internet and Voice Mail are not to be used in ways that are disruptive or offensive to others or in ways that could be harmful to workplace morale. Further, there is to be no display or transmission of sexually explicit images, messages or cartoons, or any transmission or use of such communications containing ethnic slurs, racial epithets or anything that may be construed as offensive, harassing or disparaging to others based on their race, religion, national origin, sex, age or disability. Further, CEICC assumes no responsibility and will assume no liability for an employee's misuse of the equipment or telephones. However, it does reserve the right to terminate an employee immediately for improper use of the equipment or telephones. E-Mail, Internet and Voice Mail are not to be used to solicit or to address others for commercial purposes, religious and political causes, or for any other solicitations that are not work related. Employees should not attempt to gain access to another employee's personal E-Mail, Internet or Voice Mail file without the latter's express permission. Again, any violation of the employee policy on computers, E-Mail, Internet and Voice Mail will result in appropriate disciplinary action, up to and including discharge. The fax machine is for company use only. Any personal use of the fax machine must be approved by Human Resources and/or Supervisor. No Privacy Expectation Policy To safeguard the property of our employees, our clients and CEICC, and to help prevent the possession, sale and use of illegal drugs on CEICC's premises, CEICC reserves the right to question employees and all other persons entering and leaving our premises, and to inspect any packages, parcels, purses, handbags, briefcases, lunch boxes or any other possessions or articles carried to and from CEICC's property. In addition, CEICC reserves the right to search any employee's office, desk, files or any other area or article on our premises. In this connection, it should be noted that all offices, desks, files, computers, laptops, etc., are the property of CEICC, and are issued for the use of employees only during their employment with CEICC Inspections may be conducted at any time at the discretion of CEICC Further, CEICC reserves the right to video employees on company time.

EMPLOYEES REPRESENTED BY A UNION ARE SUBJECT TO THE TERMS AND CONDITIONS OF THEIR RESPECTIVE CBAS WITH THE COMPANY REGARDLESS OF THE POLICIES SET FORTH HEREIN.

I. Safety Practices:

1. Cox Energy, Industrial Coatings & Cleaning, LLC is dedicated to achieving a zero injury, zero incident workplace for its employees, sub-contractor employees, and the public. Safety is an obligation for all employees and sub-contractor employees, and is a condition for employment. Of foremost concern is the personal suffering of employees, relatives, and the public, that can result from incidents due to unsafe conditions and practices in the workplace.
2. All federal, state, and local safety, health, and environmental regulations applicable to the work activities are to be enforced. All requirements of this program and of any sub-contractor's safety program (with the most stringent applying) are to be enforced, but at no time, and in no way is the sub-contractor relieved of their duty to ensure due diligence in terms of regulatory compliance or adopting recognized best practices for their trade/scope of work. Variance from this program, while expected, must be communicated to and approved by the site Cox Energy, Industrial Coatings & Cleaning, LLC Site Project Superintendent or Safety Manager. Those variances and implementations of best practices may become site policy in future revisions of this program, as continuous improvement is necessary in ensuring the safest conditions possible for our employees. In situations or for all scopes of work not addressed in this plan, industry's best practice(s) will be identified and followed.
3. All personnel working on the project shall receive an initial safety orientation to introduce the program, site-specific requirements, and reminders of OSHA requirements. Safety starts at the beginning of each day on the project with the development of a job safety analysis (JSA) and/or pre-task plan (PTP) to identify hazards and controls for the day's work tasks, and documented inspections & function tests of equipment to be used.

4. Only employees and contractors with the highest commitment to health and safety, environmental protection, and compliance will work for CEICC. All employees must take personal responsibility to work safely and show concern for the health and safety of their coworkers, contractors, customers, and communities. CEICC is committed to serving its customers.
5. All Cox Energy, Industrial Coatings & Cleaning, LLC employees shall be provided with a copy of the Employee Safety Handbook.

2. DISCIPLINARY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Disciplinary Program:

1. Scope: Each employee of Cox Energy Industrial Coatings & Cleaning LLC has the responsibility of staying in compliance with all safety requirements of the Company's Safety Program. It is also required of all company employees to be aware of any specific hazards of any project encountered while an employee of Cox Energy Industrial Coatings & Cleaning LLC. This includes but is not limited to all usual or unusual hazards that may arise. It shall be the responsibility of the Supervisor in charge to assure that each employee has been trained as to the requirements of the Company's Safety Programs, and answer or find answers to the employee's questions about any usual or unusual hazards associated with the work and to effectively enforce the Disciplinary Policy. The responsibility to stay in compliance with these Safety Requirements is a condition of employment for all employees.

2. Safety Violations;

- Any deliberate action of an employee that will put themselves or others in harm's way. **
- Disregard to Company's Safety Policies or procedures.
- Misuse of tools or equipment or usage in an unsafe manner.
- Failure to wear proper PPE.
- Horseplay
- Failure to recognize and obey posted traffic rules.
- Failure to recognize and/or obey any posted warnings.
- Theft.
- Harassment in violation of federal or State law, including on the basis of race, sex & religion.
- Violation of drug and alcohol policies (consistent with applicable law).

- Insubordination or poor work attitude.
- Fighting or threatened violence.
- Falsification of Information.
- Malicious or deliberate property damage.
- Breach of confidentiality.

3. Disciplinary Procedure:

- Dealt with by management at their discretion including, but not limited to, immediate termination.

** A deliberate or blatant unsafe action by an employee which puts him/her or co-worker in immediate danger shall be dealt with immediately by management at their discretion including immediate termination.

3. STOP WORK AUTHORITY POLICY

COX ENERGY, INDUSTRIAL COATINGS CLEANING, LLC

Stop Work Authority Policy:

I. Purpose:

1. All Cox Energy, Industrial Coatings & Cleaning, LLC employees, sub-contractors, client personnel, and other participating personnel, have the obligation, responsibility, and authority for stopping work activities where concerns or questions, regarding the Health, Safety, and/or Environmental policies or procedures of Cox Energy, Industrial Coatings & Cleaning, LLC are at risk.
2. Employees are responsible to initiate a Stop Work Intervention when warranted and management is responsible to create a culture where Stop Work Authority is exercised freely.
3. When an unsafe condition is identified, the Stop Work Intervention Policy shall be initiated, coordinated through the supervisor, initiated in a positive manner, notification of all affected personnel and supervision of the stop work issue, correction of the issue, and resumption of work when safe to do so.
4. Cox Energy, Industrial Coatings & Cleaning, LLC will provide its company employees training of its SWA program prior to their initial assignment. All training shall be documented which shall include the employee's names and dates of training.
5. It is the desired outcome of the Stop Work Intervention Program that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, but occasionally additional investigation and corrective actions may be required to identify and address root causes.
6. All Cox Energy, Industrial Coatings & Cleaning, LLC employees and sub-contractor employees (if used) shall receive Stop Work Authority training before initial assignment. The training shall be documented including the employee's name, the dates of training, subject matter, and instructor's name.

II. Scope:

1. Under the Company's "Stop Work Authority (SWA) Policy", each employee has the authority and obligation to "Stop Work" if any unsafe condition exists or unsafe act occurs. Pursuant to the

Company's SWA Program, each employee has stop work authority in, among others, the following situations:

- Whenever you see something you believe to be unsafe.
- Whenever you believe an activity to be unsafe for you or a co-worker, or anyone else. Employees are expected to follow all safety and health rules. Failure to follow the important rules in this handbook, and in the Safety Manual, could result in injury to yourself or others as well as damage to the Company's, or customers property. Failure to follow CEICC's safety rules and regulation may result in disciplinary action in accordance with current practices, including termination of employment.

2. To Initiate the STOP WORK POLICY;
 - i. Identify the issue that created the SWA.
 - ii. Alert the affected employee(s) or Cox Energy, Industrial Coatings & Cleaning, LLC employee(s) engaged in the work creating an unsafe situation and request that the work be stopped.
 - iii. Contact the foreman or superintendent for the involved employee(s) or, Cox Energy, Industrial Coatings & Cleaning, LLC safety personnel to investigate.
 - iv. Inform the union steward, if applicable
3. Contact the Cox Energy, Industrial Coatings & Cleaning, LLC, Safety Department if contact cannot be made with supervision in the area, or if concerns are not addressed immediately.
4. The Cox Energy, Industrial Coatings & Cleaning, LLC Project Manager and the Client shall support a robust program that allows ANY employee to question, pause, or completely stop an activity if they believe it to be unsafe or if someone could be hurt. Employees are empowered to stop or pause an activity for potentially unsafe actions or conditions. All employers on the site shall stand in full support of this program.
5. Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated.
6. No work shall resume until all stop work issues and concerns have been adequately addressed.
7. All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.

8. Stop Work reports shall be reviewed by the Safety Department in order to measure participation, establish the quality of SWA interventions and corrective actions, establish trends, discover opportunities for improvement, and establish lessons learned.
9. A Stop Work Intervention Remediation Report shall be generated within 48 hours of the incident and shall include the causal factors and remediation methods used to mitigate the situation. Recommendations to prevent a reoccurrence of this type of incident shall be included. This report shall be discussed in the next weekly safety meeting and shall be communicated to all employees. The names of those involved in the incident shall not be included in the report.

III. Employee Right to Refuse Work:

1. OSHA defines **imminent danger** as " any conditions or practices in any place of employment which are such that a danger exists which could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through the enforcement procedures otherwise provided by this Act."
2. The right to refuse to do a task is protected (by law) if **all** of the following conditions are met:
 - a. Where possible, you have asked the employer to eliminate the danger, and the employer failed to do so; and
 - b. You refused to work in "good faith." This means that you must genuinely believe that an imminent danger exists; and
 - c. A reasonable person would agree that there is a real danger of death or serious injury; and
 - d. There isn't enough time, due to the urgency of the hazard, to get it corrected through regular enforcement channels, such as requesting an OSHA inspection.
3. The affected employee(s) shall take the following steps:
 - a. Ask your employer to correct the hazard, or to assign other work;
 - b. Tell your employer that you won't perform the work unless and until the hazard is corrected; and
 - c. Remain at the worksite until ordered to leave by your employer.
4. Cox Energy, Industrial Coatings & Cleaning, LLC projects accept no less than full compliance with these requirements; the Project Superintendent shall be contacted to assist in a Right to Refuse situation/event. Employees that refuse a task in good faith shall not be retaliated against, in accordance with applicable labor laws.

“DO IT SAFELY, OR NOT AT ALL”

SAFETY FIRST!!!!

4. FIT FOR DUTY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Fit for Duty Work Policy:

I. Statement of Policy:

The purpose of this policy is to determine if the employees of Cox Energy, Industrial Coatings & Cleaning, LLC are medically and physically qualified to perform his/her job duties under required working conditions. Return to Work assessments shall be performed as a pre-employment requirement, after an illness or injury, or as a condition of job transfer.

II. Assessment:

1. The employee shall, as a condition of employment, undergo a Fitness to Work examination by a licensed health care professional. The medical professional shall return a report of;
 - a. Fit for duty – no restrictions
 - b. Fit for duty – subject to work restrictions/modifications
 - c. Unfit for duty
2. Persons determined to be fit for duty – no restrictions, are deemed medically and physically qualified to perform all assigned job duties.
3. Persons determined to be fit for duty – subject to work restrictions/modifications, shall be only assigned duties that take the work restrictions/modifications into consideration. Employees shall be informed by communicating the company policy via a safety meeting or toolbox talk, reviewing the policy as part of the new employee orientation, and/or posting the policy in a conspicuous location, etc.
4. Persons deemed to be unfit for duty shall not be assigned to the job site.
5. Local health care providers shall be advised that Cox Energy, Industrial Coatings & Cleaning, LLC provides modified work to injured employees, whenever practicable. This may be accomplished by proactively making arrangements with clinics that specialize in Occupational Health, and recommending injured employees seek treatment there. If/when this is not practicable, a standard letter shall be drafted that outlines the company's modified

work opportunities. Injured employees should take this letter with them when they visit their health care provider.

6. Cox Energy, Industrial Coatings & Cleaning, LLC shall ensure that modified work being offered is consistent with the medical restrictions listed by the health care provider. Employees must ensure that changes in the scope of the modified work must adhere to the medical restrictions. Modified work is temporary and should be managed with a goal to return the individual to full time work as soon as deemed medically fit.

7. A list of jobs available to be performed for employees on modified duty shall be maintained. All jobs shall be assessed to determine which jobs can be performed by persons working under specific restrictions. It is recommended that a Physical Demands Analysis (PDA) be prepared for each of these jobs to ensure employees are placed accordingly.

8. Supervisors shall be made aware of the restrictions to ensure the modified work meets the physician's orders.

9. Medical records shall be kept by the employer strictly on a need-to-know basis. The records shall be kept in a locked file. If the injury is of an OSHA Recordable nature and is considered confidential, no employee identification shall be recorded on the OSHA 300 log.

10. Cox Energy, Industrial Coatings & Cleaning, LLC shall maintain written records of all incident details. This will help the company to recall information about the circumstances of the incident at a later time, and will demonstrate due diligence. Incident investigation records shall be maintained. Records shall be kept of communications with the injured employee regarding modified work. Workers Compensation and medical records, where applicable, shall also be maintained.

III. Drug & Alcohol Use:

1. An employee's abuse of drugs and alcohol jeopardizes the safety of co-workers and the public and damages the reputation of the Company and its employees. When performing work duties, employees have a responsibility to ensure their on-the-job performance of these duties is not impaired by using drugs or alcohol, regardless of whether such use is legal or illegal. To promote on-the-job safety, Cox Energy, Industrial Coatings & Cleaning,

LLC conducts mandatory drug and alcohol testing of all employees who perform safety-sensitive functions. These individuals are referred to herein as covered personnel.

IV. Guidelines:

1. All managers and officials of the Company must attend at least two (2) hours of training on the signs and symptoms of drug and alcohol abuse.
2. Prior Job Drug and Alcohol History: The Company shall obtain the employment history of a covered applicant. A written release of the covered applicant's drug and alcohol history is a requirement of employment. The previous employer is required to release this information upon request and upon receiving the written request. A newly covered employee cannot work beyond fourteen (14) days without this drug and alcohol history, unless the record of the previous history cannot be obtained.
3. Conditions Requiring Testing: Covered personnel are designated for drug and alcohol testing under any of the following conditions:
 - a. Pre-Employment: Any individual applying for a covered position will be tested before employment, post-accident, at random, and for cause, (reasonable suspicion).
 - b. Random:
 1. Random drug testing shall be conducted each year at a rate to equal at least 50% of safety-sensitive employees
 2. Random alcohol testing shall be conducted each year at a rate to equal at least 25% of safety-sensitive employees.
 - c. Reasonable Suspicion:
4. Employee's activities, behaviors and job performance shall be monitored to determine if the employee should be removed from the work site. If a manager or authorized Company official has cause to believe or has reasonable suspicion that an employee's use of legal or illegal substances is adversely affecting performance or fitness for duty based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech, or body odors of the employee, these findings and observations are to be documented on a Behavior/Incident Documentation

form and a drug and/or alcohol test is required. The employee shall be relieved of duties until the results of the alcohol/drug testing have been received.

5. Annual or Biennial: Drug testing is performed on covered personnel as part of annual or biennial physical examinations where the examinations are required by law, regulation, or Company policy.

6. Post-Accident: Recordable accidents shall require testing for alcohol and controlled substances following an occurrence for any employee:

a. Alcohol testing must be administered within two (2) hours and drug testing within thirty-two (32) hours of an accident. Covered personnel are prohibited from using alcohol or controlled substances following an accident until they have been tested,

7. Return-to-Duty and Follow-Up: A covered employee who is allowed to return to performing safety-sensitive duties after undergoing a Company approved substance abuse counseling/treatment program must submit to at least six (6) unannounced tests in the first twelve (12) months after returning to duty. Follow-up testing may be extended for up to sixty (60) months following return to duty.

8. Testing procedures: Covered personnel are subject to alcohol screening and a five-panel drug screen in accordance with and conforming to the stipulations set forth in DOT drug and alcohol testing procedure rule, 49 CFR Part 40.

9. Covered personnel who voluntarily request assistance for substance abuse are relieved of duties, but may be retained as employees in non-safety sensitive positions or placed on medical leave or leave without pay while undergoing treatment. They must also undergo substance abuse counseling/treatment approved by the Human Resources Department. The cost of any substance abuse treatment and rehabilitation is the responsibility of the employee involved.

10. Failure to comply with the Company's Drug and Alcohol Testing policies will result in disciplinary action up to and including termination.

V. Medication Reporting:

1. Employees shall report all medications they are taking. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor. A copy of the current medical prescription shall be made available for review by management

2. Employees shall be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers. Employees are responsible for self-reporting of health problems which will affect the performance of their assigned job duties.

5. COMPETENCIES & QUALIFICATIONS POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

COMPETENCIES & QUALIFICATIONS PROGRAM

1. OSHA requires the following regarding instruction/training of hazard awareness, which will be enforced, as a minimum on the site:
 - a. *1926.20(b)(4) - "The employer shall permit only those employees qualified by training or experience to operate equipment and machinery. "*
 - b. *1926.21(b)(2) - "The employer shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury. "*
2. Cox Energy shall have organizational chart or list of job titles/roles. Cox Energy shall set minimum qualification requirements for each title/role identified in the chart/list. Each person who assumes a position for a job/role shall be evaluated to ensure that each person meets the qualification necessary for their job/role. This evaluation shall be documented and shall be kept in each person's personnel file.
3. All employees working for Cox Energy, Industrial Coatings & Cleaning, LLC shall have at least OSHA 10-hour (Construction) training current within the last three years. Foreman (all levels), supervisors, and full-time safety coordinators shall have OSHA 30-hour (Construction) training current within the last three years. OSHA 30 training for workers promoted to a foreman/supervisor level must be completed within 30 days. OSHA 10-hour and 30-hour training must remain current for the duration of employment at the project. Online training is accepted if from an OSHA-authorized provider. Training must be completed before the start of work. OSHA 10-hour construction training is considered entry-level and must be accompanied by additional training specific to an employee's trade or scope of work.
4. Employees working for Cox Energy, Industrial Coatings & Cleaning, LLC shall receive training/education specific to the employee's assigned scope of work. This training is to be completed prior to the employee starting work on the project. Initial

training shall be documented by Cox Energy, Industrial Coatings & Cleaning, LLC and recorded in a training matrix. Documentation/proof of training must be provided by the employee upon request. Training topics and instruction shall meet OSHA and other regulatory agencies as applicable.

5. In addition to the requirements of the preceding paragraph, Cox Energy, Industrial Coatings & Cleaning, LLC shall provide HSE, leadership, and technical/supervisory training as necessary to maintain a high level of competency of the Company's leadership.

6. Non-exempt (hourly) and technicians shall be provided with all training deemed necessary to ensure competency in their job performance. This training shall consist of either on-the-job training or formal classroom, instructor-led training or a combination of both.

7. All training shall be documented as to date, type of training, instructors name, and employees name and job classification. Competency shall be verified before employees are permitted to perform tasks independently.

8. Equipment Training;

- a. Equipment training shall be provided to all mobile equipment operators. Operator cards or other proof of training (issued hardhat stickers) must be available in the field on the employee's person for verification.
- b. Training shall be documented on the training matrix with records of training readily available at the project site.
- c. Operator training shall be conducted by a qualified trainer having a current Train-the-Trainer certification, or equivalent credentials, for the same style/class of equipment.
- d. Documented training for each class of mobile equipment (aerial work platform, industrial forklift, etc.), shall meet the requirements of the appropriate regulatory agency.
- e. Training may be conducted in a classroom setting or utilizing an online component, with a hands-on operator qualification.

Additionally, familiarization instruction for different makes or models of equipment used shall be completed prior to use. This familiarization must cover the purpose and function of all controls, and safety devices/operating characteristics specific to the equipment.

9. Training Records:

- a. Each employee shall provide training records prior to their starting at the project. This includes, but is not limited to, photocopies of employee training cards, annual and recurring training records, OSHA logs, training matrices, job specific SDS, etc. Training matrix updates are to be provided to the Safety Department on a periodic basis, but not to exceed every quarter. Training matrices must be updated at all times and readily available for inspection at the project site.
- b. Competent and qualified workers are to be designated in writing and submitted to the Cox Energy, Industrial Coatings & Cleaning, LLC Safety Department with proof of training to accompany submission.

6. PROJECT SITE ORIENTATION POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

PROJECT SITE ORIENTATION:

1. To ensure proper training and authorization to work at the project, the following requirements have been developed. The safety and security of all employees at the project is our highest priority.
2. All employees entering the job-site shall complete the Cox Energy, Industrial Coatings & Cleaning, LLC safety orientation to receive a badge to access the project. Site orientations in English will be held during morning working hours at a minimum the Monday of each work week. Completion of orientation and badging may take approximately 1 to 2 hours, depending upon the site. Contact the Cox Energy, Industrial Coatings & Cleaning, LLC Site Superintendent or Safety Manager for more specific details and times.
3. All personnel entering the site must be approved for entry by authorized Cox Energy, Industrial Coatings & Cleaning, LLC or sub-contractor representatives. The Project Management team shall maintain a roster of authorized personnel with the Security office. The site Cox Energy, Industrial Coatings & Cleaning, LLC Safety officer shall be contacted prior to the arrival of new hires to add to the orientation roster/sign-in. New hires must be checked in prior to the beginning of orientation by an authorized a Cox Energy, Industrial Coatings & Cleaning, LLC representative.
 - a. New Hire Required Items:
 - (i) Employees starting at a Cox Energy, Industrial Coatings & Cleaning, LLC Project are required to have the following at orientation to receive a construction badge;
 - (ii) Proof of OSHA 10-hour construction training for workers, and 30-hour for foremen/leads and superintendents. Project management, administrative personnel, visitors, and vendors are excluded.
 - (iii) Cox Energy, Industrial Coatings & Cleaning, LLC will accept cards current within 3 years, and certificates of completion from an OSHA - authorized online training course. Sign-in rosters for training completed with local trainers/training centers may be approved at Cox Energy, Industrial Coatings & Cleaning, LLC discretion. Certificates of completion signed by the outreach trainer are preferable to sign-in rosters.

- d. completes a fit for duty screening.
- e. Safety toe boots (steel or composite) meeting ANSI or ASTM requirements.
- f. An acceptable form of identification (employees must be a minimum of 18 years of age).
- g. Proper dress, long pants, sleeved shirt, in good condition.
- h. Project and OSHA minimum training is required before undertaking any work activity. See Job Competency Program plan for more information.

7. COMPANY MOBILE EQUIPMENT/ VEHICLE USE POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

COMPANY MOBILE EQUIPMENT/VEHICLES USE

POLICY:

ONLY AUTHORIZED, TRAINED AND LICENSED EMPLOYEES ARE PERMITTED TO OPERATE TRUCKS, TRACTORS, FORKLIFTS, AND OTHER COMPANY MOBILE EQUIPMENT AND/OR VEHICLES. UNAUTHORIZED RIDING ON MOBILE EQUIPMENT AND/OR VEHICLES IS PROHIBITED.

1. Operators of mobile equipment/vehicles must have sufficient education, training, and experience. A worker must not operate mobile equipment unless the worker: (a) is trained to safely operate the equipment (b) has demonstrated competency in operating the equipment to a designated competent worker (c) is familiar with the equipment's operating instructions (d) is authorized by the company to operate the equipment (e) if licensing is required, possess a valid driver's license with the endorsements for the type of motor vehicle they will operate.
2. If you are authorized and trained to operate company mobile equipment and/or vehicles, abide by all traffic regulations and be alert to pedestrians.
3. Before starting the engine, the operator shall fasten seat belts and adjust them for a proper fit. Seat belts are to be worn at all times when operating a company mobile equipment/vehicle; passengers are required to wear seatbelts while in a company mobile equipment and/or vehicle.
4. Company mobile equipment/vehicle operators are required to operate their vehicle at a safe speed (10 mph on company property) at all times. You should, however, be alert for moving vehicles when walking through buildings and yards. Don't walk alongside or talk to the operator of mobile equipment/vehicle while it is in motion.

I. Driving Safety:

1. Only authorized employees shall drive mobile equipment/vehicle in the course and scope of work or operate company-owned mobile equipment/vehicle. Employees are required to follow all traffic laws and

rules of the road while on company business. All accidents shall be reported promptly according to the procedures outlined below.

2. Personnel permitted to drive mobile equipment/vehicles (e.g., Company automobiles, delivery vehicles, trucks, forklifts, tractors, loaders, back hoes, bobcats, mowers, etc.) must demonstrate the knowledge and ability to operate the equipment safely to the satisfaction of a qualified examiner.

II. Responsibilities:

1. Driver's Supervisor;

a. Ensures that employees under his/her supervision are responsible for possessing a valid driver's license for the type of mobile equipment/motor vehicle they operate.

b. Ensures that mobile equipment/vehicles are used only for official Company business and carries only Company employees who are authorized passengers.

c. Ensures all operators of mobile equipment and/or powered industrial trucks are properly trained in the operation of the vehicles.

d. Ensures all mobile equipment/vehicle drivers have the necessary medical examinations to ensure that the driver is physically qualified to operate the equipment.

e. Regularly inspects mobile equipment/vehicles and mobile equipment/vehicle systems.

2. Employee(s)

a. Carries the required valid driver's license with the endorsements for the type of motor vehicle they will operate

b. Daily inspects mobile equipment/vehicles before using. Items to be checked should include the forks, batteries, wheels, cables, lights, horns, back-up alarm, mirrors, steering, brakes, tires and controls.

c. Report any defects or malfunctions to the supervisor immediately.

d. Not use a malfunctioning mobile equipment/vehicle if the defect impairs the safe operation or use of the mobile equipment/vehicles.

e. Operates mobile equipment/vehicles safely and in accordance to

operating instructions.

f. Seat belt use is mandatory for the driver and passengers while the mobile equipment/vehicle is in operation.

g. Employees are strictly prohibited from operating mobile equipment/vehicles while under the influence of drugs or alcohol. This includes: a. blood alcohol level at or above the local legal limit; b. illegal drugs; and c. prescription medications that cause drowsiness or other conditions that may cause impairment. Employees taking prescription medication that may impact their safety shall report this to their supervisor.

3. Safety and Health Manager

- a. Maintains with the Supervisor, records of employee qualification tests.
- b. Assists, when necessary, in selecting and designation of jobs which require powered industrial trucks.
- c. Periodically and routinely inspect mobile equipment/vehicles and mobile equipment/vehicles operations.
- d. Coordinates with the Supervisor, training programs for use and operation of the vehicles.

III. General Requirements:

1. The examiner will administer a driving test to each prospective operator of the specified equipment.
2. The operator is required to:
 - a. Point to and explain the following controls: lifts, tilt, forward and reverse gears.
 - b. Perform all driving and loading/unloading maneuvers deemed necessary by the examining official.
 - c. Upon satisfactory completion of the test procedures, a permit card shall be signed by the examiner and mobile equipment/vehicles licensing official. The permit shall be valid as long as health requirements and safe operating techniques are met.

IV. Operating Rules and Practices:

- a. Safeguard pedestrians at all times. Do not drive mobile equipment/vehicles up to anyone standing in front of a stationary or fixed

object (e.g., a bench or parked vehicle).

b. Mobile equipment/vehicle incidents occurring while on company business must be reported. Emergency services should be called (if necessary), and the incident should be reported to the insurance company and the employee's supervisor. Report to supervisor all accidents involving personnel, building structures, and equipment.

c. Obey all safety signs and markers.

d. Any cargo on or in mobile equipment/vehicles must be adequately stored and secured to prevent unintentional movement of the equipment which could cause spillage, damage to mobile equipment/vehicles, or injury to the operator.

e. The mobile equipment/vehicles shall only be used for its intended purpose.

f. Pre-use inspections shall be performed before operating mobile equipment/vehicles for each shift to ensure that it is in safe operating condition and that no one will be endangered by the start-up of the equipment. A checklist should be used for pre-use inspections that consists of a walk-around the vehicle to check for any defects to mobile equipment/vehicles and ensure there are no barriers blocking the path. Company-owned mobile equipment/vehicles shall have a maintenance program in place to ensure safe operations in accordance with the manufacturer's recommendation.

g. In the event employees are driving personal vehicles for company business, pre-use inspections and regular vehicle maintenance must still be completed.

h. Authorized drivers must follow safe driving practices. Some examples of safe driving practices include hands-free cell phone use, cell phone use prohibited while driving, not manipulating radios or other equipment which may cause distraction, not exceeding the posted speed limit and maintaining a safe distance between other vehicles etc.

Vehicle and equipment operation (situational awareness)

- Only qualified and competent workers are able to operate mobile equipment/vehicles and heavy equipment;
- All mobile equipment/vehicles operators requiring certification must be

certified and licensed for the jurisdiction they will be operating in. All certifications must be current and proof of certification must be available for inspection on request;

- The number of passengers in mobile equipment/vehicles or heavy equipment is limited to the number of seats and seat belts available. All passengers must wear seat belts;
- It is forbidden to ride on any mobile equipment/vehicles or piece of heavy equipment outside a properly equipped occupant compartments;
- Dangerous goods are transported and handled in full compliance with Transportation of Dangerous Goods Act and Regulations;
- A maximum speed limit of 15 mph/25 km an hour must be obeyed when travelling on client's and business property;
- A maximum speed limit of 10 mph/15 km an hour must be obeyed within 330 ft/100m of all workers and heavy/light equipment;
- All traffic signs and posted speed limits on TC Energy property shall be obeyed; and,
- Don't jump/leap in and out of mobile equipment/vehicles.

Backing guidelines - Situational awareness

- Every time a driver exits their company mobile equipment/vehicles (except for refueling) the driver will place their Situational Awareness device on or around the exterior of the vehicle in a position that prompts the driver to perform a 360° walk-around. Before getting back in the vehicle, the driver will retrieve the cone while performing their 360 walk-around and create a mental image of how they intend to exit the parking area and into the traffic flow.
- Situational Awareness devices must be placed while mobile equipment/vehicles are parked overnight.
- The operator shall make sure the warning signal is operating when the equipment is backing up.

Guidelines/approach:

- The operator Situational Awareness practice is applicable to all employees
- Prior to backing, the operator will tap on their horn (not required if the vehicle is equipped with back-up beepers).
- The operator shall make sure the warning signal is operating when the

equipment is backing up.

- Once mobile equipment/vehicles are parked the driver must place a Situational Awareness device at a position that prompts the driver to perform a 360 walk-around. This gives the driver the opportunity to survey/observe the area for possible hazards.
- Prior to re-entering mobile equipment/vehicles the operator shall retrieve the Situational Awareness devices while performing their 360 walk-around.
- Prior to driving away, create a mental image of how to safely exit the parking area and into traffic flow.
- If a trailer is attached to mobile equipment/vehicles, the Situational Awareness device shall be placed at the back passenger side of the trailer.
- Prior to backing mobile equipment/vehicles and/or trailer inside a TC Energy facility (away from the designated traffic path) the driver must place Situational Awareness device at the spot in which they intend to back into. This requirement will not be required if a spotter is being used.
- Situational Awareness device shall be present overnight while the mobile equipment/vehicles is parked. Only mobile equipment/vehicles or heavy equipment essential to work in progress are allowed in the immediate area. All other mobile equipment/vehicles shall be safely parked in designated areas:
- There are minimum distance requirements when working in proximity to hazardous work area locations;
- mobile equipment/vehicles and heavy equipment will not pass over buried pipelines, trench way or station sidewalks except at designated points;
- All heavy equipment on TC Energy worksites must be equipped with a back-up and/or warning device to indicate motion or travel;
- No person shall mount or dismount a moving mobile equipment/vehicles or piece of equipment;
- The operator shall not load mobile equipment beyond its established load limit and shall not move loads which, because of the length, width, or height that have not been centered and secured for safe transportation. All mobile equipment/vehicles carrying loads shall have the load

properly secured and loads which project beyond the length of the vehicle shall be properly flagged or lighted;

- No person shall occupy the cab of mobile equipment/vehicle while it is being loaded or unloaded when there is a danger that the load may fall on the cab.

V. Use of Powered Mowers, Tractors, etc.

a. Operation is limited to qualified operators approved for use of specific equipment. Equipment may also be used by supervised individuals who are training for certification.

b. Equipment operators must wear approved safety shoes and, as appropriate, eye and hearing protection.

VI. Off Road Vehicles

- Operators of All Terrain Vehicles (ATVs)/Utility Terrain Vehicles (UTVs) must hold a valid operator's license before operating equipment;
- Seatbelts/life restraints must always be worn by all occupants when available and the vehicle is provided with a roll overprotective structure;
- Three quarter (3/4) or full-face helmets meeting DOT/CSA standard or SNELL with visor or goggles, and bearing Department of Transportation certification, must be worn by all personnel operating or riding on an ATV or UTV when outside of a TC Energy fenced operating facility;
- Wearing the site specific Personal Protective Equipment as required once dismounting the ATV or UTV;
- All such vehicles must be legally registered where required by Federal and state regulations;
- ATVs and UTVs shall be identified by an orange reflective safety flag attached at the top of a 6 ft/1.8 m long whip antenna;
- All ATVs and UTVs must be secured to the vehicle during transportation; and,
- Vehicles transporting ATVs and UTVs must be equipped with ramps secured to the vehicle to prevent slipping off the ramp during loading and unloading.

VII. Load Handling

- Loads are never carried over the heads of personnel and personnel shall not work under a suspended load unless it is physically supported by

means of shoring, skids, etc.;

- That personnel never stand under a suspended load;
- The controls are never left unattended while a load is suspended.
Whenever the load on a lifting device is suspended off the ground for extended periods (i.e. during tie-ins) or while the lifting device is transporting a load suspended from the boom, the boom and cable brakes MUST be engaged to prevent unintentional lowering of the boom or load;
- Any sling or cable where the rigging limitations are not legible will be discarded;
- All slings, hooks, cables and tag lines shall be inspected prior to use and replaced if defective;
- No mobile equipment/vehicles or piece of heavy equipment may be parked or positioned, even temporarily, beside any joint(s) of pipe when they are being lifted or will likely be lifted for any reason by any means; and,
- All equipment is shut down before any adjustments, repairs or cleaning is done.

VIII. Danger Zone

The “DANGER ZONE” is defined as any location within 20 ft/6 m of a piece of heavy equipment and for equipment with booms, cables, counterbalances, etc. The “DANGER ZONE” is boom/counterbalance length plus 20 ft/6 m.

Heavy equipment includes, but is not limited to the following:

- Winch trucks, Cherry pickers
- Draglines or Crane Trucks
- Bulldozer
- Dump trucks
- Boring equipment
- Tractor units and trailers
- Hydraulic lifts
- Industrial tractors with front-loader
- Trenchers loader and/or backhoe
- Sidebooms
- Combinations
- Platforms

- Mobile cranes
- Tack rigs
- Pneumatic and air track drills
- Welding rigs
- Backhoes
- Bobcat
- Graders
- Bending machines
- Man Lifts
- Pile Driving Units

Danger zone precautions

- No person shall enter the “DANGER ZONE” while equipment is in operation unless their presence is essential to the work in progress;
- The operator of heavy equipment shall immediately sound a warning horn upon unauthorized entry to the “DANGER ZONE” and discontinue work and not resume until the “DANGER ZONE” is clear;
- Before lifting any pipe, the operator of any heavy equipment shall double check that no person has taken an unsafe position in the “DANGER ZONE”;
- When the “DANGER ZONE” extends into an adjacent travelled or occupied area, flagging shall be strung to indicate restriction of movement of the equipment into that area and a signalman shall direct the operator in the area and restrict traffic or activity there; and,
- No person or vehicle shall pass through the “DANGER ZONE” until eye contact has been established with the operator and authorization granted by the operator

IX. Signal Person/Swamper

A Signal Person/Swamper wearing the appropriate Personal Protective Equipment (e.g. high visibility vest, fire retardant clothing) is required when, but not limited to:

- A piece of equipment is operating within 20 ft/6 m of any above ground facility;
- The operator cannot clearly see the work or load;

- The equipment is moved and the Operator cannot see all parts of the machine and its path of travel;
- Hazards such as overhead power lines fall within the “DANGER ZONE”; and,
- Direct vehicles necessary to the operation when positioning near an excavation edge.

The Signal Person must be in direct communications at all times with the Operator. The Signal Person/Swamper shall discontinue work activities if an unauthorized person enters the “DANGER ZONE”. Under normal operations, Operators shall take direction from only one appointed Signal Person/Swamper.

AN OPERATOR MUST OBEY STOP SIGNALS AT ALL TIMES NO MATTER WHO GIVES IT!

X. Refueling

- No refuel with the engine running;
- No refuel under power lines;
- No refuel within 330 ft/100 m of watercourses; and,
- Refuel in a well-ventilated area where smoking or other ignition sources are not allowed.

XI. Unattended Mobile Equipment/Vehicles

When parking any mobile equipment/vehicle or heavy equipment, the worker shall:

- Set the brake;
- Lower attachments to the ground or cradle;
- Place all controls in the neutral or park position;
- Disengage the transmission and shut off the ignition before leaving any piece of equipment;
- Chock the equipment wheels or tracks to prevent runaway after dismounting (ensure parallel parking alignment to excavations); and,
- Render the ignition and operating controls on unattended equipment inoperable by any unauthorized person on TC Energy property, rights of way or easements.

The Operator may leave the equipment running in extreme cold weather and unattended provided:

- All controls are neutralized and locked;
- The equipment is braked or otherwise mechanically restrained;
- The wheels or tracks are chocked; and,
- An appointed attendant observes the unit at frequent and regular intervals to detect creep of the drive train or movement of attachments.

XII. Mobile Equipment/Vehicles Accident:

1. In cases of accident:

- a. Stop immediately.
- b. Take steps to prevent another accident at the scene.
- c. Call a doctor or ambulance, if necessary.
- d. Notify police.
- e. DO NOT sign any paper or make any statement as to who was at fault (except to your supervisor or to a Federal Government investigator).
- f. Obtain the name and address of each witness
- g. Provide your name, address, place of employment, name of your supervisor, and upon request, show your operator's permit.
- h. Make notes of the following:
 - (i) Registration information for other vehicle(s), (owner's name, tag number and state, serial number, and vehicle description).
 - (ii) Information on other drivers (name, address, operator's permit number and expiration date).
 - (iii) Name and address of each person involved and extent of injury, if any.
 - (iv) Name and address of company insuring other vehicle(s).
 - (v) General information such as location, time, measurements, weather, damage, etc.

9. As soon as possible, notify your supervisor and, if driving an interagency motor pool vehicle, the manager of the pool which issued

the vehicle.

10.If the vehicle is unsafe to operate, have it towed to the nearest garage or service station.

11.If you are injured, notify the Safety and Health Manager.

12.Submit all reports and data to your supervisor within one working day.

13.If you are injured have the police notify your supervisor who will assume your responsibilities for reporting the accident.

XIII. Fleet Preventative Maintenance Program:

- 1.Preventative maintenance (PM) consists of scheduled servicing, inspections, and mobile equipment/vehicle repairs to prevent potential problems and maximize vehicle availability. It is used by Cox Energy, Industrial Coatings, & Cleaning in fleet management to proactively avoid or reduce vehicle breakdowns and is based on time, mileage, engine hours, or gallons of fuel used. Preventative maintenance actions include vehicle inspection, lubrication, adjustment, cleaning, testing, repair, and/or worn parts replacement.
2. An inventory of the company's machinery/equipment has been established and is kept current. When new machinery or equipment is acquired, it is added to the inventory.
3. To maximize the availability of vehicles, PM services shall be performed on a scheduled basis. If preventative maintenance is not performed regularly, vehicle life span will be greatly reduced.
4. Proper maintenance will also help prevent litigation from negligence.
5. As defined, liability is premised upon providing an employee with a dangerous tool or instrument, such as a vehicle, while knowing, or having reason to know, that use of the vehicle creates unreasonable risk or harm to others. Simply stated, the vehicle must be safe to operate.

XIV. Proactive Scheduled Preventative Maintenance:

1. The Cox Energy, Industrial Coatings, & Cleaning PM program shall consist of the following:

- a. Checklist of PM service tasks performed.
- b. PM service interval or frequency to perform tasks.
- c. Driver written-up inspections and/or complaints.
- d. An automotive facility with trained professional automotive technicians — either in-house or outsourced.
- e. Scheduling and recordkeeping, either manual or electronic.

XV. Preventative Maintenance Service Checklist:

1. The following shall be addressed during a routine preventative maintenance service: engine oil and filter changes; transmission fluid; fuel system; cooling system; engine and transmission mounts; drive shafts or CV joints; belts and hoses; tune-ups; electrical system components; braking system; steering and suspension system; tires, wheels, and rims; exhaust system; undercarriage and frame; exterior and interior lights; body, glass, and mirrors; windshield wiper system; horn; seatbelts and seat structures; fluid leaks; and auxiliary systems.
2. The following mobile equipment/vehicle systems shall be monitored by the driver:
 - a. Mobile equipment/vehicle safety items (e.g., tires, wipers, horn, brakes, steering, etc.).
 - b. Mobile equipment/vehicles drivability items (e.g., misfire, rough idle, etc.).
 - c. Mobile equipment/vehicles body (e.g., glass, body damage, cleanliness, etc.).
 - d. Mobile equipment/vehicles miscellaneous repair items (heater, radio, etc.).
3. The mobile equipment/vehicle operator shall be trained on proper inspection procedures and be held responsible for failure to inspect and report vehicle problems.
4. Defects observed in machinery or equipment shall be reported to the Cox Energy, Industrial Coatings, & Cleaning Fleet Manager, and said defects shall be repaired or replaced before the machinery or equipment is returned to service.

XVI. Determining Preventative Maintenance Intervals:

1. Check the mobile equipment/vehicle owner's manual for the manufacturer's recommended PM intervals. A preventative maintenance schedule shall be established based on manufacturer requirements and industry standards. However, note that PM service intervals depend upon vehicle's operating conditions during either "normal" or "severe" duty. Cox Energy, Industrial Coatings, & Cleaning fleet operates under what is considered normal duty.
2. Preventative maintenance shall be performed by either an in-house certified automotive technician or outsourced to a local automotive service center specializing in fleet preventative maintenance with certified technicians using state-of-the-art equipment.
3. In-house technicians shall be trained on the importance of performing thorough preventative maintenance service. The technician must proactively service each vehicle to reduce breakdowns and repairs.
4. If Cox Energy, Industrial Coatings, & Cleaning fleet operations outsources preventative maintenance, a local vendor specializing in maintaining fleet vehicles shall be used. The Cox Energy, Industrial Coatings, & Cleaning Fleet Manager shall meet with the vendor's service manager to discuss the following PM service issues:
 - a. Expectations,
 - b. Requirements,
 - c. Scheduled intervals.
5. The vendor shall be provided with the Company Health and Safety PM checklist. The Cox Energy, Industrial Coatings, & Cleaning Fleet Manager shall communicate the exact expectations to the maintenance facility using the Cox Energy, Industrial Coatings, & Cleaning PM program.
6. Since maintenance and repair cost are considered a variable operating expense, the Company Fleet Manager shall track parts, labor, vendor, fuel, and collisions. These costs shall be monitored and analyzed routinely to determine which vehicles cost the most. This enables proactive decisions regarding vehicle efficiency and replacement. A properly maintained vehicle provides the lowest operating cost.

XVII. Records of Vehicle Maintenance:

1. Using data collected from tracking preventative maintenance activity and cost, a detailed report shall be generated. This report shall be generated on a monthly basis and submitted to senior management for review. An outline of the total number of completed vehicle jobs, both scheduled and unscheduled shall be included. Detailed information on the type of scheduled and unscheduled work performed shall be included. Also include fleet variable operating cost items.
2. Preventative maintenance performed on Cox Energy, Industrial Coatings, & Cleaning machinery or equipment shall be documented and retained for the life of the machinery or equipment.

8. GENERAL SAFETY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

GENERAL SAFETY RULES:

- Report to work well rested and physically fit to be able to give full attention to your job.
- No person shall be permitted to remain on the premises while their ability to work is so affected by alcohol, drugs (prescription and/or nonprescription) or other substance, so as to endanger their health or safety or that of any other person.
- Persons working alone shall be required to check in regularly with a Supervisor to ensure that their wellbeing is maintained.
- Inappropriate behavior, such as horseplay, fighting and practical jokes are extremely dangerous and will not be tolerated.
- Any unsafe conditions which are encountered shall be corrected or reported to your Supervisor or Safety Department.
- Do not operate any machinery or equipment if it is known to be in an unsafe condition.
- Machinery and equipment, including vehicles, are only to be operated by qualified persons and then only when adequately trained in the use of the equipment and authorized to operate it.
- Unsafe Acts shall be reported to your Supervisor and/or the Safety Department.
- Personal protective equipment ("PPE") must be worn when performing specific duties that require its use to ensure worker safety. Persons refusing to wear PPE will be subject to disciplinary action. Selection of the correct PPE may require assistance, contact the Safety Department for guidance.
- Employees must inform Supervisors when they have significant allergies which might be encountered while at work (i.e. bee stings). This information is to be passed on to the Safety Department so that first aid personnel can be made aware of it. The person with the severe allergy should carry and "ANA Kit" or "Epi-pen" and be familiar with how to use it.
- Avoid manual lifting of materials, articles or objects which are too heavy. Wherever possible, use mechanical lifting devices to move heavy objects.
- Smoking is only permitted outside buildings. Where "NO SMOKING" signs are posted (i.e. near flammable storage), persons shall observe those signs.

- Employees are responsible for reporting to their Supervisor and Safety department whenever they become sick or injured at work. All injuries, no matter how minor, must be reported immediately.
 - Always keep your work area clean and orderly. Poor housekeeping habits can be a serious safety hazard. Do not leave materials in aisles, walkways, stairways, roads or other points of egress.
 - Always keep vehicles and equipment free of trash.
 - Any damaged equipment or missing machine guards must be reported to your Supervisor.
 - All warning signs, signals and alarms shall be obeyed.
- Employees shall not use unfamiliar tools or equipment without proper instruction and permission from their immediate Supervisor. Always use the correct tool for the job, do not improvise.
 - Loose or ragged clothing, dangling neckwear or bracelets shall not be worn around moving parts of machinery or electrically energized equipment.
- Firefighting equipment shall be maintained in accordance with the manufacturer's instructions and the requirements of the BC Fire Code.
 - Whenever mobile equipment or vehicles are equipped with seat belts, the operator and passengers shall use the belts whenever the equipment is moving. Failure to abide by this requirement will result in disciplinary action.
- Flammable liquids are to be handled and stored only in approved safety containers. Proper lids and caps must always be used on storage containers. Cloth, paper, and other "make-shift" lids and caps are prohibited. Use bonding cables while filling containers holding flammable liquids.
- Never dispense gasoline into a fuel tank while the engine is running, or the motor is hot.
 - Do not dispose of any hazardous materials or flammable liquids by pouring them down a sewer or drain. Guidance in proper disposal of hazardous materials is available from the Safety Department.
- Compressed gas cylinders should be stored in an upright position and chained or otherwise secured. Where not connected to a service line or manifold system, the protective caps for these cylinders shall be in place.
 - Flash-back arrestors must be in place on all oxyacetylene fuel gas cutting equipment.

- Compressed air shall not be used for cleaning clothing or to blow dust from your body.
- Do not attempt to repair defective wiring or other electrical equipment. Report defective electrical equipment to your Supervisor. Electrical equipment can only be repaired or serviced by a qualified electrician.
- Faulty or makeshift ladders shall not be used.

9. INSPECTION & ENFORCEMENT POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

INSPECTIONS & ENFORCEMENT:

1. Regular job site inspections shall be performed by all the Cox Energy, Industrial Coatings & Cleaning, LLC supervisory personnel. These inspections will be facilitated by the use of an observation program and enforced to OSHA regulations and the policies of this program. Cox Energy, Industrial Coatings & Cleaning, LLC employs a full-time safety manager to assist in setting up a project safety program, which provides guidelines for job site performance and maintaining effective loss control.
2. As the field staff walks the site, they are expected to perform a safety inspection. The executed checklists will be returned to the project safety coordinator for recording and processing. Non-compliant safety findings will be delivered immediately to the Cox Energy, Industrial Coatings & Cleaning, LLC Project Manager so the situation can be corrected. It is the responsibility of everyone at Cox Energy, Industrial Coatings & Cleaning, LLC on the project to work safely and in accordance with the applicable standards to ensure the well-being of all employees. Furthermore, the sub-contractors (if used) must maintain the safe working conditions established by Cox Energy, Industrial Coatings & Cleaning, LLC. All unsafe conditions or actions identified are required to be abated with corrective actions put in place to eliminate or reduce recurrence.
3. The Client may also employ full-time safety person that administers a safety observation program aimed at ensuring safe working actions & conditions are maintained, and recognized best practices are implemented.
4. All sub-contractor, supervisors and safety personnel are responsible to inspect and maintain safe working conditions for their employees and not endanger the safety of others. Conditions change rapidly on a construction site; a continuous inspection & auditing program helps to ensure that work in an environment of constant change can be completed without injury.

10. RISK ASSESSMENT POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

RISK ASSESSMENT POLICY:

I. Introduction:

1. Nobody expects an emergency or disaster - especially one that affects them, their employees, and their business personally. Yet the simple truth is that emergencies and disasters can strike anyone, anytime, and anywhere. The best way to protect yourself, your employees, and your business is to expect the unexpected. A forced evacuation could happen at the company when it is least expected. COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC has developed a Risk Assessment Plan to guide its employees when immediate action is necessary. The is in writing, kept in the workplace, and available to all employees for review. However, when COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC has 10 or fewer employees on a job site, the policy shall be communicated orally to all affected employees.

2. These procedures are designed to help the employees respond to potential emergencies such as lightning, tornadoes, earthquakes, spills and fires. All affected employees shall be trained in safe-evacuation procedures and will learn the parts of the evacuation plan that apply to the particular job site. They shall receive updated training as their responsibilities in the plan are changed.

II. Hazard Identification:

A workplace emergency is an unforeseen situation that threatens employees, customers, or the public; disrupts or shuts down operations; or causes physical or environmental damage. This Risk Assessment Plan covers designated actions COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC will take to ensure employee, customer, and the public safety from emergencies. Emergencies may be natural or manmade and may include the following.

- Floods,
- Hurricanes,
- Tornadoes,
- Fires,
- Toxic gas releases,
- Chemical spills,
- Radiological accidents,

- Explosions,
- Civil disturbances, and
- Workplace violence resulting in bodily harm and trauma.

1. In the Event of Lightning:

- a. Work will stop when lightning is within 10 miles and for 30 minutes.
- b. Employees will be taken to safe area (i.e. Company truck, office trailer, and the like).
- c. Each Superintendent shall have a lightning detector for each job.

2. In the Event of a Tornado/Earthquake:

Tornadoes occur more frequently in the spring and early summer months, although they can occur at any time. Supervisors should pay close attention to weather reports during tornado "season" and be prepared to implement appropriate emergency procedures when notified by local authorities or the sounding of tornado sirens. Earthquakes occur at any time.

- a. If you are inside: If there is no time crouch under a desk or table, away from windows or glass dividers. Stay away from tall objects, such as file cabinets.
- b. If you are outside: Seek cover in low lying depressions away from buildings, trees, telephones and electric lines.

3. In the Event of a Fire:

- a. Be familiar with the location of fire extinguishers in your work area. If you detect a fire, notify co-workers, and your supervisor immediately.
- b. If the fire seems controllable, **you may, if you are trained**, on a voluntary basis, try to extinguish it as long as you can do so safely.
- c. Immediately sound the alarm and call 911 if it appears the fire cannot be easily controlled.

III. At a minimum, the Company Risk Assessment Plan shall include the following:

- A preferred method for reporting fires and other emergencies;
- An evacuation policy and procedure;
- Emergency escape procedures and route assignments, such as floor plans, workplace maps, and safe or refuge areas;
- Names, titles, departments, and telephone numbers of individuals both within and outside your company to contact for additional information or explanation of duties and responsibilities under the emergency plan;
- Procedures for employees who remain to perform or shut down critical plant operations, operate fire extinguishers, or perform other essential services that cannot be shut down for every emergency alarm before evacuating; and
- Rescue and medical duties for any workers designated to perform them.
- A designated assembly location and procedures to account for all employees after an evacuation.

IV. Risk/Job Hazard Assessment:

1. Risk assessments shall be performed for each job site, at a minimum, before work begins, to formally identify and assess potential hazards. Process Hazard Analysis (PHA), Job Hazard Analysis (JHA), Job Safety Analysis (JSA) daily hazard assessments, pre-task plans, pre-job hazard assessments shall be developed for all routine tasks. Formal workplace inspections shall be performed on a regular basis by a designated competent person. Risk assessments and PHAs/JHAs/JSAs shall be updated whenever changes occur to processes, equipment, and/or facilities.

2. All affected employees shall be actively involved in the risk identification and assessment process. If subcontractors are performing work at the location, they also shall be included. Identified hazards and risks must be reviewed with all affected employees.

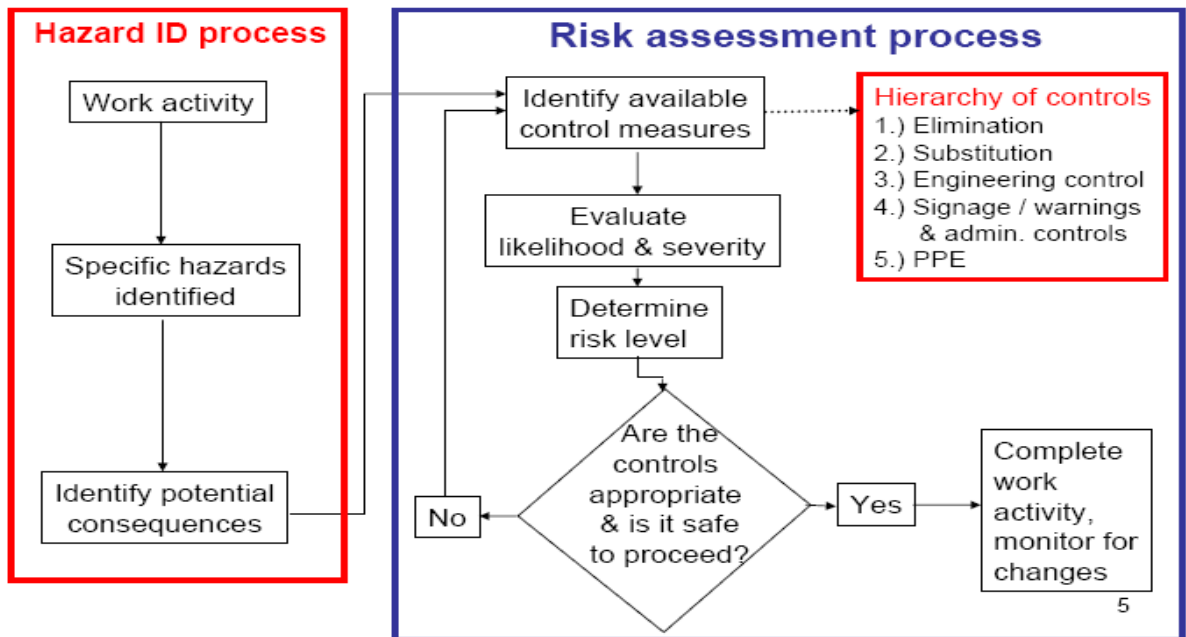
V. Hierarchy of Controls:

1. The COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC policy demonstrates how identified hazards are mitigated. The hierarchy of

controls is used to mitigate hazards. When a hazard is identified, first attempt to eliminate the hazard. If elimination is not practicable, use engineering controls. If engineering controls are not practicable, implement administrative controls. If the hazard cannot be adequately controlled using engineering and/or administrative controls, employees must use Personal Protective Equipment. A combination of engineering controls, administrative controls, and Personal Protective Equipment is usually best. (See Figure 1.)

Figure 1.

Integrating Hazard ID & Risk Assessment Hierarchy of Controls



2. This COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC policy has established a formal system for classifying and ranking hazards according to risk. Risk may be determined by analyzing the probability of the hazard causing harm, the frequency the hazard is encountered, and the potential consequences of impact with the hazard. A risk matrix has been developed to assist employees with risk assessment, establish a formal system for identifying, classifying and ranking hazards according to risk. Risk shall be determined by analyzing the probability of the hazard causing harm, the frequency the hazard is encountered (likelihood of occurrence), and the potential severity and consequences of impact with the hazard by utilizing the risk matrix. (See Figure 2.)

Figure 2

The Risk Priority Chart

PROBABILITY: what is the likelihood of it happening?	CONSEQUENCE: how severely could it hurt someone?		
	CATASTROPHIC kills, disables, permanently injures	MAJOR significantly injures, NOT permanently	MINOR first aid only, no work time lost
VERY LIKELY: it could happen	1	2	3
LIKELY: it could happen occasionally	2	3	4
UNLIKELY: it could happen, although uncommon	3	4	5
VERY UNLIKELY: it could happen, although probably never will	4	5	6

- If you score a 1 or 2, do something **NOW**.
- If you score a 3 or 4, plan to do something soon.
- If you score a 5 or 6, plan to review the risk in the future.

VI. Training:

1. All affected employees shall be trained on the hazard identification and risk assessment process. This training shall include:

- Conditions under which an evacuation would be necessary;
- A clear chain of command and designation of the person in your business authorized to order an evacuation or shutdown. A Supervisor shall be designated an “evacuation warden” to assist others in an evacuation and to account for personnel;
- Specific evacuation procedures, including routes and exits. These procedures shall be posted where they are easily accessible to all employees;
- Procedures for assisting people with disabilities or who do not speak English;

e. Designation of what, if any, employees will continue or shut down critical operations during an evacuation. These people must be capable of recognizing when to abandon the operation and evacuate themselves; and

f. A system for accounting for personnel following an evacuation.

g. Individual roles and responsibilities;

h. Threats, hazards, and protective actions;

i. Notification, warning, and communications procedures;

j. Emergency response procedures;

k. Location and use of common emergency equipment; and

l. Emergency shutdown procedures.

2. Employees shall review the plan annually, and also when the following occurs:

a. Hire new employees;

b. Introduce new equipment, materials, or processes into the workplace that affect evacuation routes;

c. Change the layout or design of the facility; and

d. Revise or update your emergency procedures.

VII. Personal Protection Equipment:

Employees exposed to or near accidental chemical splashes, falling objects, flying particles, unknown atmospheres with inadequate oxygen or toxic gases, fires, live electrical wiring, or similar emergencies shall be provided with appropriate personal protective equipment.

VIII. Medical Assistance:

1. First aid must be available within 3 to 4 minutes of an emergency. Worksites more than 3 to 4 minutes from an infirmary, clinic, or hospital should have at least one person on-site trained in first aid and CPR (available all shifts), have medical personnel readily available for advice and consultation, and develop written emergency medical procedures.

2. It is essential that first aid supplies are available to the trained first aid providers, that emergency phone numbers are placed in conspicuous places near or on telephones, and prearranged ambulance services for any emergency are available. The COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC shall, whenever possible, coordinate an emergency action plan with outsider responders such as the fire department, hospital emergency room, EMS providers and local HAZMAT teams.

IMPORTANT PHONE NUMBERS

FIRE, POLICE, AMBULANCE: 911

CEICC'S MAIN OFFICE: 304-932-4333

CEICC'S FAX: 866-205-4342

CEICC'S SAFETY DEPARTMENT: 304-932-4333

11. EMERGENCY ACTION (CRISIS MANAGEMENT) PLAN POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

EMERGENCY ACTION (CRISIS MANAGEMENT) PLAN:

I. Introduction:

1. Nobody expects an emergency or disaster - especially one that affects them, their employees, and their business personally. Yet the simple truth is that emergencies and disasters can strike anyone, anytime, and anywhere. The best way to protect yourself, your employees, and your business is to expect the unexpected. A forced evacuation could happen at the company when it is least expected. COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC has developed an Emergency Action Plan to guide its employees when immediate action is necessary. This Emergency Action Plan is in writing, kept in the workplace, and available to all employees for review. However, when COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC has 10 or fewer employees on a job site, the policy shall be communicated orally to all affected employees.
2. These procedures are designed to help the employees respond to potential emergencies such as lightning, tornadoes, earthquakes, spills and fires. All affected employees shall be trained in safe-evacuation procedures and will learn the parts of the evacuation plan that apply to the particular job site. They shall receive updated training as their responsibilities in the plan are changed.

EMERGENCY PLAN COORDINATOR:

The Safety & Health Manager is responsible for making sure this emergency action plan is kept up to date, practices, and reviewed periodically.

The Emergency Plan Coordinator can be reached at Cox Energy, Industrial Coating, & Cleaning LLC, Main Office: 304-932-4333

1. Workplace Emergencies:
 - a. The Cox Energy, Industrial Coatings, & Cleaning Emergency Action Plan includes procedures for reporting a fire and medical emergency. The Emergency Action Plan also includes procedures

for natural disasters, spills, and other threats to your organization.
The notification procedure is as follows;

- a. In the event of a fire emergency, (Company office), a fire alarm will sound for the building//work - site. (fire alarm, PA System, Two-Way Radio, or verbal communication).
- b. All other notifications for natural disasters shall be job site specific with approval of the client and consistent with their emergency action plan. Affected employees shall be notified of the signal alarm being used.
- c. The alarm system shall be distinctive and recognizable as a signal to evacuate the work area or perform actions designated under the emergency action plan. For those employers with 10 or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding the alarm provided all employees can hear the alarm.
- d. A workplace emergency is an unforeseen situation that threatens employees, customers, or the public; disrupts or shuts down operations; or causes physical or environmental damage. This Emergency Action Plan covers designated actions COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC will take to ensure employee, customer, and the public safety from emergencies. Emergencies may be natural or manmade and may include the following.
 - Floods,
 - Hurricanes,
 - Tornadoes,
 - Fires,
 - Toxic gas releases,
 - Chemical spills,
 - Radiological accidents,
 - Explosions,
 - Civil disturbances, and
 - Workplace violence resulting in bodily harm and trauma.

In the Event of Lightning:

- Work will stop when lightning is within 10 miles and for 30 minutes.

- Employees will be taken to safe area (i.e. Company truck, office trailer, and the like).
- Each Superintendent shall have a lightning detector for each job.

In the Event of a Tornado/Earthquake:

Tornadoes occur more frequently in the spring and early summer months, although they can occur at any time. Supervisors should pay close attention to weather reports during tornado "season" and be prepared to implement appropriate emergency procedures when notified by local authorities or the sounding of tornado sirens. Earthquakes occur at any time.

- If you are inside: If there is no time crouch under a desk or table, away from windows or glass dividers. Stay away from tall objects, such as file cabinets.
- If you are outside: Seek cover in low lying depressions away from buildings, trees, telephones and electric lines.

In the Event of a Fire:

- Be familiar with locations of fire extinguishers in your work area. If you detect a fire, notify co-workers, and your supervisor immediately.
- If the fire seems controllable, **you may, if you are trained**, on a voluntary basis, try to extinguish it as long as you can do so safely.
- Immediately sound the alarm and call 911 if it appears the fire cannot be easily controlled.

2. At a minimum, the Company Emergency Action Plan includes the following:

- A preferred method for reporting fires and other emergencies;
- An evacuation policy and procedure;
- Emergency escape procedures and route assignments, such as floor plans, workplace maps, and safe or refuge areas;
- Names, titles, departments, and telephone numbers of individuals both within and outside the company to contact for additional information or explanation of duties and responsibilities under the emergency plan;

- a. Mary Prim – Office Manager – 304-932-4333
 - b. Dewayne Cox – Superintendent – 304-989-6493
 - c. Kevin Harrison – Safety Manager – 304-559-2299
- Procedures for employees who remain to perform or shut down critical plant operations, operate fire extinguishers, or perform other essential services that cannot be shut down for every emergency alarm before evacuating; and
 - Rescue and medical duties for any workers designated to perform them.
 - A designated assembly location and procedures to account for all employees after an evacuation.

II. Emergency Evacuation:

1. Every exit shall 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 exits be blocked.
2. 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” or a sign indicating its actual use (i.e., “Storeroom”). Exits and accesses to exits shall be marked by a readily visible sign. 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.
3. On the client's work site, evacuation routes shall be clearly marked and assembly areas shall be designated for evacuees.
4. Occupant Emergency Plan for Persons with Disabilities:
 - a. The first line supervisor is assigned the responsibility to assist Persons with Disabilities under their supervision. An alternate assistant will be chosen by the supervisor. The role of the two assistants is to report to their assigned person, and to either assist in evacuation or assure that the Persons with Disabilities is removed from danger. Supervisors, alternates, and the person with a disability will be trained

by the Safety and Health Manager on available escape routes and methods.

- b. A list of persons with disabilities is kept in the Office of Health and Safety. This list is updated by the Safety and Health Coordinator and the Office of Personnel Management.
 - c. . Visitors who have disabilities will be assisted in a manner similar to that of Company employees. The Host of the person with disabilities will assist in their evacuation.
5. Emergencies Involving Fire:
- a. Fire Alarms-
In the event of a fire emergency, a fire alarm will sound for the building//work - site. (Fire Alarm, PA System, Two-Way Radio, or verbal communication).
 - (i) Evacuation Routes and Plans-
 - (ii) Each facility/job site, shall have an emergency evacuation plan. All emergency exits shall conform to NFPA standards.
 - (iii) Should evacuation be necessary, go to the nearest exit and proceed to an area of refuge outside the building or away from the work site.
6. Emergency Coordinators-
- a. Emergency Coordinators shall verify and account for all personnel that have evacuated for whom they are responsible.

III. Emergency Procedures:

- 1. If you discover a fire:
 - a. Activate the nearest fire alarm
 - b. Notify the fire department by dialing 911. Give your location, the nature of the fire, and your name.
 - c. Notify the Manager on duty and other occupants.
 - d. Notify the Safety and Health Manager.
- 2. Fight the fire **ONLY** if:
 - a. The fire department has been notified of the fire, **AND**
 - b. The fire is small and confined to its area of origin, **AND**
 - c. You have a way out and can fight the fire with your back to the exit, **AND**
 - d. You have the proper extinguisher, in good working order, **AND** know how to use it.

- e. If you are not sure of your ability or the fire extinguisher's capacity to contain the fire, leave the area.

3. If you hear a fire alarm:

- a. Evacuate the area. Close windows, turn off gas jets, close doors and shut down equipment as you leave.
- b. Leave the building/work area and move away from exits and out of the way of emergency operations.
- c. Assemble in the designated area.
- d. Report to the Manager/monitor so he/she can determine that all personnel have evacuated your area.
- e. Remain outside until competent authority (Physical Security, Safety and Health Manager, or your supervisor) states that it is safe to re-enter.

4. Evacuation Routes:

- a. Learn at least two escape routes, and emergency exits from your area.
- b. Never use an elevator as part of your escape route.
- c. Learn to activate a fire alarm.
- d. Learn to recognize alarm sounds.
- e. Take an active part in fire evacuation drills.

3. Risk Assessment:

- a. Risk assessments shall be performed for each job site before work begins, to formally identify and assess potential hazards. Job Safety Analysis (JSA), and/or Job Hazard Analysis (JHA), shall be developed for all routine tasks. Formal workplace inspections shall be performed on a regular basis by a designated competent person. Risk assessments and JSAs/JHAs shall be updated whenever changes occur to processes, equipment, and/or facilities.
- b. The COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC program describes how potential hazards are identified. This includes, but is not limited to, Job Safety Analysis (JSA), daily hazard assessments, or pre-job hazard assessments, hazard workplace inspection.
- c. Employees shall be actively involved in the Emergency Action Plan process. If subcontractors are performing work at the location, they also shall be included. Identified hazards and risks must be reviewed with all affected employees.

4. Training:

- a. All affected employees shall be trained on the Emergency Action Plan with respect to the hazard identification and risk assessment process. This training shall include:
 - (i). Conditions under which an evacuation would be necessary;
 - (ii) A clear chain of command and designation of the person in your business authorized to order an evacuation or shutdown. A Supervisor shall be designated an “evacuation warden” to assist others in an evacuation and to account for personnel;
 - (iii) Specific evacuation procedures, including routes and exits. These procedures shall be posted where they are easily accessible to all employees;
 - (iv) Procedures for assisting people with disabilities or who do not speak English;
 - (v) Designation of what, if any, employees will continue or shut down critical operations during an evacuation. These people must be capable of recognizing when to abandon the operation and evacuate themselves; and
 - (vi) A system for accounting for personnel following an evacuation.
 - (vii) Individual roles and responsibilities;
 - (viii) Threats, hazards, and protective actions;
 - (ix) Notification, warning, and communications procedures;
 - (x) Emergency response procedures;
 - (xi) Location and use of common emergency equipment; and
 - (xii) Emergency shutdown procedures.
- (xii) COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC shall review the emergency action plan when the plan is developed, annually thereafter, and when the employee is initially assigned to a job, and when the employee's responsibilities under the plan change, and when the plan is changed.

5. Personal Protection Equipment:

- a. Employees exposed to or near accidental chemical splashes, falling objects, flying particles, unknown atmospheres with inadequate oxygen or toxic gases, fires, live electrical wiring, or similar emergencies shall be provided with appropriate personal protective equipment.

6. Medical Assistance:

- a. First aid must be available within 3 to 4 minutes of an emergency.
Worksites more than 3 to 4 minutes from an infirmary, clinic, or hospital should have at least one person on-site trained in first aid and CPR (available all shifts), have medical personnel readily available for advice and consultation, and develop written emergency medical procedures.
- b. It is essential that first aid supplies are available to the trained first aid providers, that emergency phone numbers are placed in conspicuous places near or on telephones, and prearranged ambulance services for any emergency are available. The COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC shall, whenever possible, coordinate an emergency action plan with outsider responders such as the fire department, hospital emergency room, EMS providers and local HAZMAT teams.

IMPORTANT PHONE NUMBERS

FIRE, POLICE, AMBULANCE: 911

CEICC'S MAIN OFFICE: 304-932-4333

CEICC'S FAX: 866-205-4342

CEICC'S SAFETY DEPARTMENT: 304-932-4333

12. DRUG & ALCOHOL-FREE POLICY

COX ENERGY,
INDUSTRIAL
COATINGS &
CLEANING, LLC

DRUG-AND
ALCOHOL-FREE
WORKPLACE SAFETY
PROGRAM

SEE SEPARATE
DOCUMENT

13. INCIDENT/ ACCIDENT INVESTIGATION POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Incident/Accident Investigation Policy:

I. Scope:

A proactive, ongoing process to identify and assess hazards in order to fix them is a core element of any effective safety and health program. Failure to identify or recognize hazards is frequently one of the “root causes” of workplace injuries, illnesses, and incidents and indicates that the safety and health program is ineffective. Hazard assessment can lead to opportunities to improve program performance.

Hazards identified using the processes described here will be addressed under the hazard prevention and control section of these guidelines.

II. Hazard Identification:

1. Collection and review of information about hazards are likely to be present in the workplace.
2. Periodically inspect the workplace to identify new or recurring hazards
3. Investigate injuries, illnesses, incidents, and close calls/near misses to identify the underlying hazards.
4. Identify and address any trends in injuries, illnesses, and hazard reports.
5. Consider hazards associated with emergencies or non-routine situations.
6. Determine the severity and likelihood of incidents that could result from each hazard identified and use this information to prioritize corrective actions. Note: COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC has an ongoing obligation to control serious, recognized hazards.

III. Accident/Investigation Procedure:

In the event of an accident/incident, the following procedure shall be followed:

1. When the company is notified of a work-related incident, the company shall appoint qualified personnel to conduct investigations of incidents once the company is notified of the event. The investigation should take place as soon as possible after the incident occurs. While all incidents must be investigated, the extent of the investigation should reflect the seriousness of the incident. First Aid cases shall be investigated, but minimal resources may be required.

2. Incidents/accidents must be reported by the appropriate manager or Safety & Health Manager within the end of the shift of the occurrence, and include the following types:
 - a. Any accident which involved an injury requiring a doctor's treatment, whether it be a First Aid case, OSHA recordable or lost time case;
 - b. Any lost time accident will require a phone call by the appropriate manager to the Company President.
 - c. Any near miss incident;
 - d. Auto/Motor fleet incident; and
 - e. Property damage and public liability incident.
3. Supervisors and/or the Safety & Health Manager shall ensure that work is stopped until it has been deemed that the incident area is safe and free of any hazards; post-accident drug/alcohol testing of involved personnel shall be done according to the Fit for Duty Policy.
4. A supervisor shall accompany each injured employee to the medical facility where treatment will be provided; the supervisor will explain the circumstances involved relating to the injury to the treating physician;
5. The supervisor who accompanies the injured employee shall provide the treating physician with an authorization for initial treatment and release of medical information form and request that the doctor complete the form;
6. The injured individual is required to take an authorization for initial treatment and release of medical information for all follow-up doctors' visits. Copies of all pertinent information should be submitted to Safety Department on immediate return to job; and
7. Light duty or restricted duty may be available to injured employees. The field supervisor will explain this program to the treating physician and explain to the physician that completing the authorization for initial treatment and release of medical information form will help us create a light-duty position that stays within the guidelines and restrictions placed on the patient.

8. Notify Safety and Health Manager immediately where an incident that requires off-site assistance such as medical care beyond first aid, emergency services or environmental remediation:
9. Commence and maintain Jobsite OSHA 300 Log and Job Incident Log,
10. Reconcile jobsite OSHA 300 Log with the Regional Insurance Department Log on a monthly basis;
11. Maintain and complete all incident files for each new occurrence. This will include, but is not limited to, documents as defined in this program:
12. Issue all relevant forms;
13. Initiate Post Incident Review Meeting; and
14. The injured/affected employee shall participate in all required meetings as set forth in this program.
15. Environmental, Safety and Health Department shall:
 - a. Ensure that incidents are reported as required by OSHA regulations and within the time frame specified.
 - b. Ensure that work-related injuries or illnesses that result in hospitalizations, amputations, or loss of an eye are reported to OSHA within twenty-four hours of the incident.
 - c. Ensure that, for incidents that result in fatality, the fatality is reported to OSHA within eight hours.
 - d. Ensure that incidents involving company employees are reported to the Owner Client (host facility) as soon as possible but no later than twenty-four hours.
 - e. Ensure all incidents are reviewed and recorded as per OSHA record keeping requirements:
 - f. Communicate incident classifications to Regional Insurance Department for recording purposes; and
 - g. Develop monthly, quarterly and yearly incident statistics and trends as required.

IV. Training Of Qualified Personnel:

1. All accidents/incidents shall be verbally reported to applicable regulatory agency(s) within 8 hours of their discovery. Incidents must also be reported to the client as soon as possible or in a timely manner (within 24 hours of incident).
2. Members of the incident investigation team shall be trained, qualified and competent individuals. The company shall provide training on investigation techniques used during an incident investigation. Personnel shall be trained in their roles and responsibilities for incident response and incident investigation techniques so that they understand their roles and responsibilities for incident response and be familiar with the techniques used in incident investigations.
3. Evidence of the incident must be collected and preserved for incident investigation. Initial identification of evidence immediately following the incident shall include a listing of people, equipment, and materials involved, recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions. Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers shall be detailed. The need for follow-up interviews should also be addressed. Equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, marking devices such as flags, equipment manuals, etc.
4. Evidence of the incident must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.
5. Incident Investigations shall be documented. Participants shall prepare a written investigation report that includes immediate corrective action to be taken and long term actions that are required to prevent the recurrence of the incident, as well as the description of the incident, any evidence collected during the investigation, an explanation of the causes of the incident and corrective actions, include an incident report form and a detailed narrative statement concerning the events, and corresponding corrective action. The format of the narrative report may

include an introduction, methodology, summary of the incident, investigation board member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included.

V. Corrective Action Plan:

1. For all recordable, lost time and/or near-miss incidents, a Corrective and Preventative Action Plan shall be completed in a timely manner. The written incident investigation report shall include any immediate corrective actions that were taken as well as any long-term actions that are required to prevent the recurrence of the incident. The Safety & Health Manager has the primary responsibility for the Corrective and Preventative Action Plan.
2. The objective is to investigate the incident, to develop Root Cause Analysis, and to establish corrective and preventative actions to prevent future occurrences.
3. Lessons learned shall be reviewed and communicated to affected employees in order to prevent reoccurrence of the incident or those similar and changes to processes must be placed into effect to prevent recurrence or similar events. Targets and established dates of completion are to be set.

14. HAND AND POWER TOOL POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Hand & Power Tool Policy:

- I. Hand and power tools are a part of our everyday lives and help us to easily perform tasks that otherwise would be difficult or impossible. However, these simple tools can be hazardous, and have the potential for causing severe injuries when used or maintained improperly. Special attention toward hand and power tool safety is necessary in order to reduce or eliminate these hazards. Employees using hand and power tools are exposed to hazards of falling, flying, abrasive or splashing materials, as well as harmful dusts, fumes, mists, vapors or gases. Workers must be provided with appropriate personal protective equipment to guard against injury. All electrical connections for tools must be suitable for the type of tool and the working conditions (e.g. wet, dusty, flammable vapors). Employees shall be trained in the proper use of all tools. Workers shall be able to recognize the hazards associated with the different types of tools and the safety precautions necessary.

II. General Safety Rules: Work Area

1. Keep work areas clean, clutter free, and well lit.
2. Do not operate power tools in explosive atmospheres, such as in the presence of flammable liquids, gases, or dusts.
3. Create a buffer zone around the work area to keep unauthorized personnel away while operating power tools.
4. Avoid dangerous environments, do not operate ungrounded cord and plug tools in a wet location. GFCI's are always required when operating cord and plug tools.
5. Practice good housekeeping, store cutting edges with protective coverings, and always store flammable and combustible materials properly.

6. Avoid slips, trips, and falls. There shall be no debris, cords, hoses, tools, or other materials in the walkways of the work area. Clean up spills promptly.
7. All rags or other materials that have the potential for spontaneous combustion shall be placed in sealed containers and disposed of at the end of the shift.
8. All firefighting equipment shall be readily accessible and unobstructed.

III. Electrical Safety

1. Do not abuse cord and plug tools. Never use the cord to carry the tool.
2. When using battery operated tools, always use the correct charger to recharge the tool.
3. Dispose of batteries either through recycling (recommended) or by following manufacturers' recommendations.
4. Hold tools by the insulating grips when performing an operation where the tool may contact hidden wiring.
5. Never modify the plug in any way.
6. Any power tool that is damaged shall be removed from service and tagged "DO NOT USE". Any damaged power tool shall only be repaired by authorized service representatives.

IV. Tool Safety

1. Maintain all tools in good operating condition. Inspect power tools for misalignment or binding of moving parts. Whether furnished by the employer or the employee, the tools shall be maintained in a safe condition. Tools that are deemed unsafe shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.
2. Keep tools sharp and clean. Properly maintained cutting tools with sharp cutting edges are less likely to bind and are easier to control.

3. Always operate power tools according to manufacturers' recommendations.
4. Disconnect all power tools before servicing
5. Do not force the tool. Be aware of kick-back or binding potential.
6. Keep all guards in place. Guards shall be in place and operable at all times while the tool is in use. The guard may not be manipulated in such way that will compromise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in ANSI B15.1.
7. Always use the proper tool for the job. Never modify a tool to do something it's not intended to perform.
8. Read and understand all rules and instructions that come with power tools. Frequently review these instructions for continued safe and efficient operation of the tool.
9. Secure work. Use clamps, vise, or other mechanical holding means. It's safer than using your hands and it frees both hands to operate the tool.
10. Use only manufacturers' recommended accessories.
11. Never leave a power tool running unattended. **TURN THE POWER OFF!!!**
12. Avoid accidental starting; make sure the switch is in the off position before plugging in the tool.
13. Use auxiliary handles with tools when provided. Loss of control may cause personal injury.

V. Personal Safety

1. Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to

harmful dust, fumes, mists vapors, or gases shall be provided with particular PPE necessary to protect them from the hazard. Always use required personal protective equipment (PPE). Eye protection is always required and may be supplemented with a face-shield for face and neck protection. Other PPE may include; gloves, hearing protection, sleeves, full body coverings, safety shoes, and respiratory protection.

2. Stay alert, exercise maximum care and good judgment in all hand and power tool operations.
3. Do not overreach, maintain good body position, balance, and footing at all times.
4. Dress properly, do not wear loose clothing or jewelry which could be caught in moving equipment or machinery.
5. Do not perform any hand or power tool operations while under the influence of drugs, alcohol or any prescription medication that recommends precautions.
6. Do not work in haste. Be deliberate in all actions involving hand and power tools.
7. **BAD HABITS ARE DANGEROUS**, review safety procedures.

15. PERSONAL PROTECTIVE EQUIPMENT POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Personal Protective Equipment Policy

I. Policy:

Protective clothing will be provided whenever it is necessary because of hazards, processes or environmental conditions. Cox Energy, Industrial Coatings & Cleaning, LLC requires that protective clothing be used when chemical hazards, radiological hazards, or mechanical irritants are encountered in a manner capable of causing injury or impairment through absorption, inhalation, or physical contact.

II. References: 20 CFR 1910.134 Subpart 1 – Personal Protective Equipment.

III. Purpose:

1. The purpose of this program is to protect our employees by ensuring that Personal Protective Equipment (PPE) is provided, used, and maintained in a sanitary and reliable condition whenever it is necessary due to hazards from processes or in the work environment. To the extent that it is possible and feasible, the Company shall remove or eliminate all potential hazards or exposures through engineering or work practice controls to eliminate the need for PPE.

2. This program covers eye and face protection, head protection, foot protection, hand protection, and electrical protection. Respiratory hazards and hearing protection are covered by other programs, but they will also be included in the Hazard Assessment described below. This program covers the responsibilities of managers, supervisors, and workers, assessment of hazards, selection and use of personal protective equipment (PPE) and training.

IV. Responsibilities:

1. The Safety and Health Manager shall be responsible for assessing the hazards and exposures that may occur in the workplace which require the use of PPE, determining the type of equipment to be provided, and purchasing the equipment. Input from managers, supervisors, and employees will be obtained and considered in selecting appropriate equipment.

2. Managers/supervisors will be responsible for training employees in the use and proper care of PPE, ensuring that all employees are assigned appropriate PPE, and ensuring that PPE is worn by employees when and where it is required.

3. Employees are responsible for following all provisions of this program and related procedures. They are required and expected to wear PPE when and where it is required.

V. Procedures:

1. Personal protective equipment is for eyes, face, head, and extremities, and is to include, protective clothing, respiratory devices (as required), and protective shields and barriers, safety shoes, hard hats, safety eyewear, hearing protection (as required), and gloves. PPE shall be provided, used, and maintained in a sanitary and reliable condition. Defective or damaged personal protective equipment (PPE) must not be used.

2. Requests for all personal protective equipment not available as Company stock items are generated by the supervisor and are approved by the Safety and Health Manager. The protective equipment must be worn by employees and visitors as dictated by Company policy.

3. Safety shoes shall be worn by all shop, warehouse and maintenance personnel as dictated by the nature of the work. Safety shoe areas are recommended by the supervisor and approved by the Safety and Health Manager. The user shall be responsible for the proper cleaning, maintenance and use of the safety shoes.

4. Hard hats shall be worn in all posted areas (e.g., locations in warehouses, shops, and building construction or renovation areas) and when performing work in which the supervisor Safety and Health Manager deems such hazards exist.

VI. Hazard Assessment:

1. The workplace shall be assessed to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present the company must:

- a. Select, and have each affected employee use the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment;

- b. Communicate selection decisions to each affected employee; and
- c. Select PPE that properly fits each affected employee.

2. The hazard assessment shall be certified by the person who completed the hazards assessment and the date the assessment was completed. Consideration will be given to hazards such as impact, penetration, laceration, compression (dropping heavy objects on foot, roll-over, etc.), chemical exposures, harmful dust, heat, light (optical) radiation, electrical hazards, noise, etc.

3. The Company shall verify that the workplace hazard assessment has been performed by conducting a written certification that:

- a. Identifies the workplace evaluated
- b. The evaluation has been performed
- c. State the date(s) of the hazard assessment; and
- d. Identifies the document as a certification of hazard

This certification will be dated and signed by the Safety and Health Manager or person conducting the assessment. Whenever there is a change in process or in the workplace that might introduce or change and exposure or hazard, the Company will perform an assessment to determine if there needs to be additional PPE or a change in the PPE provided. These supplemental hazard assessments will also be documented, signed and dated by the person performing the assessment. The Company will review and update the workplace hazard assessment on an annual basis.

VII. Selection of Personal Protective Equipment (PPE).

1. Personal protective equipment (PPE) shall be selected on the basis of the hazards to which the workers are exposed or potentially exposed. All selections will be made with input from managers, supervisors and workers. Consideration shall be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected

2. Personal protective equipment will meet the following standards:

- a. Eye and Face Protection devices – ANSI Z87.1-1989 “American National Standard Practice for Occupational and Educational Eye and Face Protection.”
- b. Head Protection devices – ANSI Z89.1-1986 “American National Standard for Personal Protection – Protective Headwear for Industrial Workers.”
- c. Foot Protection devices – ANSI Z41-1991 “American National Standard for Personal Protection - Protective Footwear”.
- d. Hand Protection – No national standard available – Selection will be based on task performed, conditions present, duration of use, and the hazards and potential hazards identified.
- e. Electrical Protective equipment – No national standard – Equipment will be tested electrically before first use and every 6 months thereafter or upon indication that insulating value is suspect.

VIII. Training:

1. Each affected employee required to use PPE will be trained, at a minimum, in the following:

- a. Why PPE is necessary
- b. When affected employees should wear PPE
- c. The limitations of PPE
- d. How PPE is selected, proper use and care, storage, useful life and disposal of PPE
- e. How to maintain PPE

2. The training shall include an opportunity for employees to handle the PPE and demonstrate that they understand the training and have the ability to use the PPE properly. Training shall be provided by the manager or supervisor of the affected employees. Training will be documented in writing with the documentation including the names of each employee trained, the date(s) of the training, and the subject matter covered.

3. If an employee, who has been trained, demonstrates a lack of knowledge, understanding, and/or skill required or behavior which leads the supervisor to believe the employee does not have a proper understanding of the PPE involved, that employee will be retrained. Furthermore, retraining is required when, including, but is not limited to, situations where changes in the workplace render previous training obsolete, changes in the types of personal protective equipment (PPE) to be used render previous training obsolete, or inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.

IX. Care of Personal Protective Equipment:

1. Whenever practical, PPE will be assigned to individual workers for their exclusive use. Employees will be responsible for the PPE equipment assigned to them or used by them.

2. PPE shall be provided, used, and maintained in a clean, sanitary and reliable condition. It shall be regularly cleaned, inspected and stored according to instructions given during the training sessions or as directed by supervisors or managers. The PPE employees use must be kept clean and not give the employees risk of illness. Defective or damaged PPE shall not be used. Employees are to report any defective or damaged equipment to their supervisor for repair or replacement. Procedures shall be in place to ensure defective or damaged PPE is not used. PPE that is in disrepair must be discarded or removed from service until repaired.

X. Control of Hazards:

1. Engineering and/or work practice controls shall be the primary methods used to eliminate or minimize hazard exposure in the workplace. When such controls are not practical or applicable, personal protective equipment shall be employed to reduce or eliminate personnel exposure to hazards.

2. Personal protective equipment (PPE) shall be provided, used, and maintained when it has been determined that its use is required and that such use will lessen the likelihood of occupational injuries and/or illnesses. The Safety and Health Manager will recommend and/or provide necessary protective equipment where there is a reasonable probability that the use of the equipment will prevent or reduce the severity of injuries or illness.

XI. Equipment Specifications and Requirements:

All personal protective clothing and equipment will be of safe design and construction for the work of be performed. Only those items of protective clothing and equipment that meet National Institute of Occupational Safety and Health (NIOSH) or American National Standards Institute (ANSI) standards shall be procured or accepted for use. Any employee-owned PPE shall meet the requirements for use as prescribed by the employer.

16. RESPIRATORY PROTECTION POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Respiratory Protection Policy:

I. Overview:

1. Respiratory hazards may occur through exposure to harmful dusts, fogs, fumes, mists, gases, smoke, sprays, and vapors. The best means of protecting personnel is through the use of engineering and/or work practice controls, e.g., local exhaust ventilation or wet methods. Only when engineering or work practice controls are not practical or applicable, or while they are being instituted, shall respiratory protective equipment be employed to reduce personnel exposure.

2. The Safety and Health Manager is responsible for the Respiratory Protection Program at Cox Energy, Industrial Coatings & Cleaning LLC. Employee's requiring the use of respirators must first obtain medical approval from the Company physician to wear a respirator before a respirator can be issued. The Safety and Health Manager conducts respirator training and fit tests and is responsible for determining the proper type of respiratory protection required for the identified hazard.

3. Adherence to the following guidelines will help ensure the proper and safe use of respiratory equipment: a. Effective training shall be provided to employees who are required to use respirators. The company shall provide the training prior to requiring the employee to use a respirator in the workplace. Retraining shall be administered annually, and when the following situations occur:

a) Changes in the workplace or the type of respirator render previous training obsolete;

b) Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill; or

c) Any other situation arises in which retraining appears necessary to ensure safe respirator use.

4. Engineering and/or work practice controls shall be used (e.g. - enclosure or confinement of the operation, ventilation, (substitution of less toxic materials) to minimize exposure. When effective engineering and/or work practice controls are not feasible, or while they are being instituted, appropriate respirators shall be used. A respirator shall be provided to each employee when such equipment is necessary to protect the health of such employee. The company shall provide a respirator to each employee when such equipment is necessary to protect the health of such employee. c. Appropriate respirators shall be selected and provided based on the respiratory hazards to which workers are exposed and workplace and user factors that affect respirator performance and reliability. The company shall select a NIOSH-certified respirator. The respirator shall be used in compliance with the conditions of its certification.

5. Employees shall be provided respirators that are clean, sanitary and in good working order. Respirators shall be cleaned and disinfected as often as necessary to be maintained in a sanitary condition. All 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.

II. Definitions:

- a. Respirator – a device provided to protect the wearer from inhalation of harmful or nuisance atmospheres. Respirators may function by air purifying and/or air supplying techniques.
- b. Air Purifying Respirator – a respirator that filters and/or absorbs contaminants from the ambient air being inhaled by the wearer.
- c. Supplied Air Respirator – a respirator in which clean air is supplied to the facepiece from an auxiliary source away from the wearer.
- d. Self-Contained Breathing Apparatus – a respirator in which the air supply is carried by the wearer.

e. Atmospheric Contamination – the term applies equally to gases such as nitrogen, carbon monoxide, and carbon dioxide; the vapors of volatile substances such as benzene and carbon tetrachloride; toxic dusts and fumes; radioactive materials; and so forth.

f. Respirator Fit Test – a test used to determine a proper match or fit between the facepiece of the respirator and face of the wearer.

III. Provision for Safe Working Conditions:

1. It is the Company's policy to provide employees with a safe and healthful working environment. This is accomplished by utilizing facilities and equipment that have all feasible safeguards incorporated into their design. When effective engineering controls are not feasible, or when they are being initiated, protection shall be used to ensure personnel protection.

2. All employees will be protected from exposure to airborne radioactive, chemical, or biological contamination by installing, implementing, or instituting feasible engineering, work practice, or administrative controls. If these controls do not prove feasible, or while they are being installed/instituted, appropriate respiratory protection will be provided.

3. No employee of Cox Energy, Industrial Coatings & Cleaning LLC, is permitted to wear a negative-pressure respirator in a work situation until he or she has demonstrated that an acceptable fit can be obtained. Respirator fitting is conducted initially upon assignment to a task requiring use of a respirator. Refitting is conducted annually thereafter upon successful completion of the respirator training.

IV. Respirator Use:

1. A medical evaluation shall be provided to determine the employee's ability to use a respirator before he/she is fit tested or required to use the respirator. The company shall identify a physician or other licensed health care professional to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire.

2. Employees using a tight-fitting facepiece respirator must pass an appropriate qualitative or quantitative fit test. The company shall ensure that an employee

using a tight-fitting facepiece respirator is fit tested prior to initial use of the respirator, whenever a different respirator facepiece (size, style, model or make) is used, and at least annually thereafter.

3. Tight-fitting facepieces may not be used by employees who:

- a) have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function; or
- b) any condition that interferes with the face-to-facepiece seal or valve function.

4. Each time a negative pressure respirator is donned, the user shall perform positive and negative pressure fit checks. These checks are not a substitute for fit testing. Respirator users must be properly trained in the performance of these checks and understand their limitations.

5. For all IDLH atmospheres, the company shall ensure that:

- a) one or more employees are located outside the IDLH atmosphere;
- b) Visual, voice or signal line communication is maintained between the employees in the IDLH atmosphere and those located outside;
- c) The employees located outside the IDLH atmosphere are trained and equipped to provide effective emergency rescue;
- d) A company designate is notified before the employees located outside the IDLH atmosphere enter the IDLH atmosphere to provide emergency rescue;
- e) The company designate provides necessary assistance appropriate to the situation;
- f) Employees located outside the IDLH atmospheres are equipped with proper equipment for rescuing employees who enter these hazardous atmospheres. Any employee that detects a break-through or has difficulty breathing shall leave the immediate work area to wash their face, change filters, check their respirator for proper function or take any other measure to ensure their safety. Supervision shall be notified by the employee of the problem.

6. Proper fitting of a respiratory protective device facepiece for individuals wearing corrective eyeglasses or goggles, may not be established if temple bars or straps extend through the sealing edge of the facepiece. If eyeglasses, goggles, face shield or welding helmet must be worn with a respirator, they must be worn so as not to adversely affect the seal of the facepiece. If a full facepiece respirator is used, special prescription glasses inserts are available if needed.

7. Respirators shall be inspected before each use and during cleaning. Respirator inspections should include a check of respirator function, tightness of connections, the condition of the various parts including, but not limited to, the facepiece, head straps, valves, connecting tube, and cartridges, canisters, filters and elastomeric parts.

8. Supervisors shall contact the Safety and Health Manager prior to non-routine work which may expose workers to hazardous substances or oxygen deficient atmospheres.

V. Respirator Maintenance:

1. The maintenance of respiratory protective devices involves a thorough visual inspection for cleanliness and defects (i.e., cracking rubber, deterioration of straps, defective exhalation and inhalation valves, broken or cracked lenses, etc.). Worn or deteriorated parts will be replaced prior to reissue. No respirator with a known defect is reissued for use. No attempt is made to replace components, make adjustments or make repairs on any respirator beyond those recommended by the manufacturer. Under no circumstances will parts be substituted as such substitutions will invalidate the approval of the respirator. Any repair to reducing or admission valves, regulators, or alarms will be conducted by either the manufacturer or a qualified trained technician.

2. After inspection, cleaning, and any necessary minor repairs, store respirators to protect against sunlight, heat, extreme cold, excessive moisture, damaging chemicals or other contaminants.

3. Routinely used respirators, such a half-mask or full-face air-purifying respirators, shall be placed in opaque sealable plastic bags.

4. Respirators shall be packed or stored so that the facepiece and exhalation valves will rest in a normal position and not be crushed. Emergency use respirators shall be stored in a sturdy compartment that is quickly accessible and clearly marked.

5. All respirators in routine use shall be cleaned and sanitized on a periodic basis. Respirators used non-routinely shall be cleaned and sanitized after each use and filters and cartridges replaced. Routinely used respirators are maintained individually by the respirator wearer. Replacement cartridges and filters are obtained by contacting the employee's supervisor or the Safety and Health Manager.

6. Cleaning and disinfection of respirators must be done frequently to ensure that skin-penetrating and dermatitis-causing contaminants are removed from the respirator surface. Respirators maintained for emergency use or those used by more than one-person must be cleaned after each use by the user.

17. HAZCOM POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

HAZCOM PLAN:

I. Purpose:

1. The purpose of this program is to help workers identify potentially hazardous chemicals found in the workplace, know where to find information on the chemicals, know how to read and understand important information provided by the manufacturer on working safely around these chemicals, know what to do if inadvertent contact with the chemical is made and who to contact if emergency assistance is needed.
2. This Hazard Communication Program is written for and implemented by Cox Energy, Industrial Coatings & Cleaning, LLC to comply with the requirements of OSHA's General Industry Standard 29CFR191 0.1200 and OSHA's Construction Standard 29CFR1926.59.

II. Scope:

1. The Hazard Communication Standard is a system utilized by employers to ensure that all affected employees are kept informed of the types of chemicals in their workplace, the hazardous properties of the chemicals with which they will work and both safe handling procedures and measures to take to protect themselves to work safely with these chemicals.
2. Written hazard communication program has been developed, implemented, and is maintained for each workplace/jobsite that describes how labels & other forms of warning, safety data sheets, & employee information will be met.
3. Cox Energy, Industrial Coatings & Cleaning, LLC assures that this information is readily accessible to employees by use or creation of the following:
 - Written Hazard Communication Program,
 - Project-specific chemical inventories (list) developed on each project,

- Collection and archiving in a central repository of Safety Data Sheets (SDS's) of all known hazardous chemicals used. Each chemical on the list must have the same name as the one shown on its SDS.
- The program also includes the methods the employer will use to inform employees of the hazards of nonroutine tasks. Training employees on non-routine tasks, such as the cleaning of equipment, and informing workers on the hazards associated with chemicals contained in unlabeled systems in their work areas if that should occur.

III. Policy:

1. To ensure that information about the dangers of all hazardous chemicals used on the jobsite is known by all affected employees, the following Hazard Communication Program has been established. Under this program, employees shall be informed of the contents of the OSHA Hazard Communication Standard, the hazardous properties of the chemicals with which they work, safe handling procedures and measures to take to protect themselves from these chemicals.
2. Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical specific information must always be available through labels and safety data sheets.
3. This program applies to all construction activities and jobsites where employees may be exposed to hazardous chemicals under normal working conditions.

IV. Responsibility:

1. Cox Energy, Industrial Coatings & Cleaning, LLC is responsible for development and changes to this Hazard Communication Program.
2. Cox Energy, Industrial Coatings & Cleaning, LLC management teams are responsible for implementing the program on each individual project. Each project team will implement a project program that includes: a project-specific Chemical Inventory (“Repository”) using a product identifier that is referenced on the appropriate SDS, access to SDS’s, provisions for training, requirements for the supply and use of personal protective equipment (PPE), emergency response requirements, requirements for hazards of non-routine task(s), methods for informing other employers and posting requirements.

V. Safety Data Sheets:

The company shall obtain from the chemical manufacturer, safety data sheets (SDS) for all hazardous chemicals that the company has in inventory.

1. The Hazard Communication Program integrates the newly formatted Safety Data Sheets (SDS) formerly known as Material Safety Data Sheets or (MSDS). The new SDS's will be in the required uniform format which will include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restriction on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients include information on chemical ingredients; trade secrets claims.

Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment, and chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls / personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties list the chemical's characteristics.

Section 10, Stability and reactivity list chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information.

Section 13, Disposal considerations.

Section 14, Transport information.

Section 15, Regulatory information.

Section 16, Other information, includes the date of preparation or last revision.

2. SDSs shall be maintained and readily accessible in each work area. SDSs can be maintained at the primary work site. However, they

shall be made available in case of an emergency. SDS's must be made available, upon request, to employees, their designated representatives, the Assistant Secretary & the Director.

VI. Employee Access to Information:

1. This written Hazard Communication Program is available, upon request, to employees, their designated representatives, etc. (Collective Bargaining Agent, Physicians).
2. Copies of SDS's for hazardous substances to which employees of this company may be exposed shall be kept in the SDS Library located at each jobsite. The Superintendent will be responsible for obtaining and maintaining the SDS system for the project. SDS will be readily available for company employees.
3. The Supervisor shall review incoming data sheets for any new significant health/safety information and will ensure that any new information is passed on to affected employees and all affected subcontractors on the jobsite.
4. The Hazard Communication Program shall have specific methods for providing other employer information concerning hazardous chemicals at job sites, methods of providing SDS sheets, methods of precautionary measures that are necessary to protect their employees from workplace exposure during normal operating conditions and during emergencies be taken & methods of providing information on labeling systems. Where employees must travel between workplaces during a work shift (multi job sites), the written program may be kept electronically and made available to the employees via laptop computer, I-Phone, or I-Pad.
5. The company will inform affected employees of the hazards of non-routine tasks and the hazards associated with those chemicals by providing copies of the written program electronically and made available to affected employees by computer, mobile device and/or the company's App,

VII. Labeling:

1. The Hazard Communication Program integrates the newly formatted container labeling system. New labels shall include: Product identifier; Signal Word; Hazard statement(s); Pictogram(s); Precautionary statements(s); the name, address, and telephone number of the manufacturer of the chemical

2. Materials received at the jobsite are required to be properly labeled. If labels are not provided, suppliers must be contacted by the superintendent for the specified labels. Information contained on labels must not conflict with federal, state, or local laws and / or regulations in labeling requirements. These labels shall provide the following:

- a. Name, Address and Telephone Number of the chemical manufacturer and / or importer.
- b. Product Identifier.
- c. Signal Word (Danger or Warning)
- d. Hazard Statement(s)
- e. Precautionary Statement(s)
- f. Pictogram(s)

Pictograms



The final rule requires containers shipped six months after the information is available to be labeled correctly.

3. Labels must not be removed and shall be replaced if illegible. All containers of chemical products, including laboratory bottles, solvent cans and dispensers must be labeled. Only those chemicals that can be classified as “immediate use” are exempt from the labeling procedures described above. (Immediate use is defined as the hazardous chemicals under control of and used only by the person who transfers it from the labeled container and only within the work shift in which it is transferred). **ALL CHEMICALS ARE TO BE KEPT IN THEIR ORIGINAL CONTAINERS IF AT ALL POSSIBLE.**

VIII. Training:

1. Employees shall be trained on the dangers of the hazardous chemicals with which they are exposed. This training must be given when the employees are initially assigned work and when new chemicals or chemical hazards are introduced into the workplace. Specific chemical hazard information will be made available to affected company

employees via labeling and safety data sheets (SDS). Hazard Communication Program training will address the following areas:

- Overview of the Hazard Communication Program
- Protocol for newly introduced chemicals
- Availability and location of the Chemical Repository
- Inform employees of any operation in their work area where hazardous chemicals are present.
- Location and availability of the written Hazard Communication Program for the project.
- Location and availability of the SDS for the project.
- Location of the project-specific chemical inventory (list).
- Physical and health effects of the hazardous chemicals.
- Methods and observation technique used to determine the presence of or the release of hazardous chemicals in the work area.
- How to lessen or prevent exposure to hazardous substances through usage of engineering controls, work practices and / or the use of personal protective equipment.
- Steps the company has taken to lessen or prevent exposure to these chemicals.
- Emergency and first aid procedures to follow if employees are exposed to hazardous substance(s).
 - How to read labels and review SDS to obtain appropriate hazard information.
- Have each employee trained in the above and sign the Safety Training Form.

2. Annual Review of the Hazard Communication Protocols.

1. When new hazardous chemicals are introduced to the job-site, the Cox Energy, Industrial Coatings & Cleaning, LLC Management Team will review the above items as they relate to the new chemical.

Note: It shall be the responsibility of all sub-contractors to provide the appropriate SDS's and Chemical Inventory List to Cox Energy, Industrial Coatings & Cleaning LLC, project management for all hazardous chemicals being used by their company at the jobsite,

2. Availability and Location of the Chemical Repository, instruct all employees and site workers on where the Chemical Repository is located and that the information in the Chemical Repository is always available to any interested individual during working hours.

3. Employers who produce, use, or store hazardous chemicals in such a way that the employees of other employers may be exposed shall ensure the Hazard Communication program includes the following:

a) The methods the employer will use to share SDS,

b) The methods the employer will use to inform other employers of any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies; and

c) The methods the employer will use to inform other employers of the labeling system used in the workplace.

IX. Recordkeeping:

1. Recordkeeping of the project-specific Hazard Communication Program will consist of the following:

- All SDS's of known chemicals on the jobsite. Cox Energy, Industrial Coatings & Cleaning shall have an SDS for each chemical used. If an SDS is not provided with the hazardous substance, then one shall be located.

- Requests for any SDS not furnished.
- Records of employee training and employee acknowledgement.
- Records of any employee over-exposure to a hazardous chemical.
- Records of any environmental testing program(s) with all affected employees and maintain a record of those in attendance

18. BLOODBORNE PATHOGENS POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Bloodborne Pathogens Policy:

Scope:

The purpose of the Company's (Cox Energy, Industrial Coatings & Cleaning, LLC) Bloodborne Pathogens Policy is to reduce potential occupational exposures to Hepatitis B, Hepatitis C, HIV and other bloodborne pathogens that employees may encounter in their workplace. Bodily fluids employees can reasonably expect to be exposed to on the work - site includes, but is not limited to, blood and other potentially infectious materials (OPIMs), such as saliva and mucous. This exposure-control plan will be reviewed and updated at least annually.

Section I – Employee Exposure Control Plan:.

1. All employees who could be reasonably anticipated and/or have the potential to be exposed to bodily fluids and/or other potentially infectious materials as the result of job duties shall be trained on the subject of bloodborne pathogens upon initial hire and annually thereafter at no cost to the employee. The various types of bodily fluids that the affected company employees can reasonably be exposed to in the workplace shall include, but is not limited to blood, mucus and saliva.

2. All training records shall be retained for a minimum of 3 years. The training shall include: Company policy; Types and transmission of blood borne pathogens; General safety rules; Universal precautions; Use of personal protective Equipment (PPE); Medical waste disposal procedures; Post-exposure treatment and procedures; HBV vaccinations

3. All affected employees shall have access to a copy of this Exposure Control Plan. Upon hire, the company shall advise the employee of its location.

Section II – Universal Precautions.

Universal Precautions shall be observed to prevent contact with blood or other potentially infectious materials. Under circumstances in which differentiation between body fluid types is difficult or impossible, all body fluids shall be considered potentially infectious materials. Where occupational exposure

remains after institution of engineering and work practice controls, personal protective equipment shall also be used. These precautions include:

1. Do not eat, drink, smoke, handle contact lenses or apply cosmetics in areas where exposure to blood borne pathogens is possible. Do not store food and drinks in refrigerators or cabinets where blood and other potentially infectious materials are stored.

2. Wear disposable latex or vinyl gloves if: you have cuts, abrasions, chapped hands, dermatitis or similar conditions; you are examining a victim with an open skin wound and active bleeding; you are handling blood, blood products or body secretions.

3. Wear gloves, masks, gowns, and/or lab coats, whenever there is a possibility that bodily fluids could splash on an employee.

4. PPE for the protection of workers from bloodborne pathogens may include gloves, masks, gowns, and other appropriate equipment. All PPE shall be provided to employees at no cost.

5. Perform procedures involving blood and other potentially infectious materials in such a manner that will minimize splashing or spraying.

6. Wash your hands as soon as possible after handling potentially infectious materials, and after removing protective clothing and equipment. Hand washing facilities shall be provided at all work locations if possible. In lieu of hand washing facilities, to ensure hand sanitizing, antiseptic hand cleanser with disposable towels or antiseptic towelettes must be provided.

7. Remove all protective equipment when leaving the work area and, if the equipment is contaminated, place it in a proper storage container for washing, decontamination or disposal.

8. Remove contaminated clothing before entering other areas of the work - site or leaving the work - site.

9. All non-porous surfaces contaminated with blood or other infectious material shall be decontaminated with a minimum of a 10% bleach solution for a minimum contact time of 10 minutes. Porous surfaces that have absorbed blood or OPIM shall be properly disposed of. All clean-up materials shall be properly disposed of in the bio containers.

Section III – Medical Records:

1. Cox Energy Industrial Coatings & Cleaning LLC shall provide, at its own expense, Hepatitis B vaccinations to affected employees covered under this program and who choose to be vaccinated. The company will document that it offered the vaccine, as well as the employees' decision to accept or decline and the date of vaccination.

2. Accurate medical records for each employee with occupational exposure shall be preserved and maintained for at least the duration of employment plus thirty (30) years.

19. CONFINED SPACE ENTRY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

CONFINED SPACE ENTRY PROCEDURE:

I. RESPONSIBILITIES:

1. Project Management is responsible for determining when a confined space program is needed and for coordinating with the Health and Safety Department for implementing procedures in place. Also, Project Management will archive all permits into the project files where they shall be retained for two (2) years. Entry permit means the written or printed document that controls entry into a confined space. In the event the client has their own confined space permit/procedures, project management will determine which program will prevail. Generally, Cox Energy, Industrial Coatings & Cleaning LLC Health and Safety Department will use the more stringent program. **Under no circumstances shall a Cox Energy, Industrial Coatings & Cleaning LLC employee enter into a Full – Permit – Required Confined Space**
2. Construction Management of Cox Energy, Industrial Coatings & Cleaning LLC Management Personnel are responsible for enforcing the designated program while working on site.
- 3 Cox Energy, Industrial Coatings & Cleaning LLC Health & Safety Department is responsible for the training as required for the crews. The Health & Safety Department will monitor the crews as to compliance of program. If a member of the Health & Safety Department is not on site, a member of the construction management department shall assume their duties.
4. Authority, Each department and individuals have the authority to discharge their responsibilities regarding these procedures.
5. Accountability All Cox Energy, Industrial Coatings & Cleaning LLC employees shall be held accountable for responsibilities outlined and enforcement of this procedure.

II Training:

1. Each affected employee shall be trained prior to initial assignment and prior to a change in assigned duties, if a new hazard has been created or special deviations have occurred. Before he/she begins work at a worksite, each employer shall ensure that a competent person identifies all confined spaces in which one or more of the employees it directs may work, and identifies each space that is a permit space, through consideration and evaluation of the elements of that space, including testing as necessary.
2. Personnel who work in confined spaces shall receive training in the following areas:
 - Any hazard that is associated with the confined space.
 - Required to recognize signs, symptoms of exposure to a hazard.
 - Emergency entry and exit procedures.
 - Use of applicable respirators.
 - Safety equipment use.
 - LO/TO Permit system and requirements.
 - Safe work practices required for confined space work including:
 - Lockout/tagout procedures.
 - Purging and ventilating.
 - Tools and equipment.
7. The training records shall include employee name, trainer signature/initials and dates of training. Training records must be made available to employees and their authorized representative(s).

III. DUTIES OF KEY PERSONNEL:

1. Standby person shall be stationed outside the entrance to a full permit required confined space at all times during entry operations and be assigned the following duties Attendants are the workers who watch the entrance to the confined space. They communicate with the entrants and know how many entrants are in the confined space. They

also ask for help in an emergency and do not enter the confined space.

- Maintain an accurate record of all personnel working inside the confined area.
- Be aware to the hazards of the confined space, monitor activities inside and outside, determine whether it is safe for personnel to remain inside.
- Maintain effective continuous communications with personnel inside the space, by two- way radios, hand signals or any other methods deemed appropriate.
- Be trained and prepared to perform rescue measures if needed.
- Measures necessary to prevent unauthorized entry shall be implemented. Pedestrian, vehicle and other barriers necessary to protect entrants from external hazards must be provided, and a method for verifying that conditions in the permit space are acceptable for entry during its duration.

2. Order evacuation when the following conditions occur:

- A condition is observed which is not allowed on the entry permit.
- Behavioral effects of exposure are detected.
- A situation outside the space which could endanger personnel inside.
- The standby attendant must leave his assigned area.

3. In the event that personnel are required to escape due to the presence of a hazardous condition or injury, contact supervisory personnel and appropriate emergency resources designated on entry permit. When unauthorized personnel approach or attempt to enter the confined space, take the following actions:

- Direct the unauthorized person or persons away from the space.
- Advise supervisory personnel of the incident.

4. Standby personnel (attendants) shall under no circumstances enter confined spaces to rescue personnel inside or leave their attendant position until he/she is relieved by another fully qualified standby person. All rescue measures should be re-evaluated prior to entry if the rescue is for reasons other than an injury. Prior to arrival of assistance, he/she may attempt rescue from outside the space.
5. The standby person shall not be designated as a member of the rescue team and meet all requirements of this procedure.
6. An attendant is not permitted to monitor more than one Permit Required Confined Space at a time. Multiple spaces require individual monitoring for each space.
7. Supervisory personnel (Entry Supervisor) shall be responsible for the safe execution of confined space work:
 - Ensure all information is listed on the entry permit before authorizing entry.
 - All safe work procedures and equipment are in place before the start of confined space work.
 - Cancel the entry permit whenever conditions for entry are not met.
 - Entry supervisors check the atmospheric monitoring being done and make sure all hazards have been identified and mitigated. They also make sure help is available if a rescue is needed and keep the area free of unauthorized people.

IV. Entrants Duties:

- Review the entry permit with the Entry Supervisor and all other appropriate personnel,
- Ensure that the space has been adequately ventilated, isolated, emptied, or otherwise made safe for entry.
- To immediately exit a space, without question, upon word of the attendant, no matter what the reason.

- To follow all safety rules and procedures that applies to the job.
- To be familiar with the work to be performed and the procedures that applies to the job.
- To use the appropriate PPE whenever necessary.
- Entrants, the workers who go into the confined space, must know how to use equipment and communicate with the attendant to check-in or ask for rescue.

IV. PERSONAL PROTECTIVE EQUIPMENT:

3. Protective equipment requirements must be determined prior to the issuance of a confined space entry permit. Hazards will vary from job to job and such determinations to be made on site-specific basis. General guidelines for confined space entry projects are as follows:
 - Hard hats, steel-toe shoes, safety glasses, long pants, long-sleeve shirt.
 - Protective coveralls, boots and gloves, as necessary, to protect personnel against chemical exposure due to skin contact and physical hazards including hot working surfaces, sharp edges, electric shock, abrasive surfaces.
 - Hearing protection shall be worn whenever noise levels prevent conversation at normal volume levels.
 - Respiratory protection shall be employed as required by specific site conditions.
 - A safety belt and/or body harness with lifelines to be worn by all personnel working inside the confined space as per the Confined Space Evaluation.
 - Gas-testing during initial entry.
 - When personnel are working in an area that rescue is not considered possible or such rescue would present undue risk to rescue personnel, employees shall not enter the space.

- When failure of ventilation would allow the build-up of toxic gases within the time necessary to evacuate the area, employees shall not enter the space.

V. Sub-Contractor Entry:

1. When Cox Energy, Industrial Coatings & Cleaning LLC arranges to have employees of another employer (contractor) perform work that involves a confined space entry:

- The contractor shall have been informed that the workplace contains a confined space and that confined space entry is allowed only through compliance with a confined space program meeting the requirements of 29CFR 1910.146.
- The contractor must be informed of the elements, including the hazards identified and Cox Energy, Industrial Coatings & Cleaning LLC experience with the confined space, that make the space in question confined space;
- The contractor must be informed of any precautions or procedures that Cox Energy, Industrial Coatings & Cleaning LLC has implemented for the protection of employees in or near the confined space where the contractor's personnel will be working;
- Coordinate entry operations with the contractor, when both Cox Energy, Industrial Coatings & Cleaning LLC personnel and contractor personnel will be working in or near the confined space; and
- Debrief the contractor at the conclusion of the confined space operation regarding the confined space program followed and any hazards confronted or created in the confined space during entry operations.

4. Each sub - contractor who is retained to perform confined space entry operations must:

- Obtain any available information regarding confined space hazards and entry operations from the employees.

- Coordination entry operations with the host employer, when both host employer personnel and contractor personnel will be working in or near a confined space; and
 - Inform the host employer of the confined space program that the contractor will follow and of any hazards confronted or created in the confined space, either through a debriefing or during the entry operation.
 - Provide vehicle and pedestrians barriers to protect employees from external hazards.
3. The Confined Space Program will be reviewed on a annual basis and revised if necessary. Employees or their representatives are entitled to request additional monitoring of the space at any time.
 4. Rescue service must be on site for immediate dangerous to life and health (IDLH) conditions while work is being performed. Safety belts may be used only as the primary means of suspension for the lifeline when rescue must be made by keeping the disabled body in a position that allows for easy passage through the openings.
 5. When entering into a confined space, via vertical opening, lifelines shall be attached to hoists unless site conditions make the use of such a device impractical, then other methods of retrieval are to be established.

VI. WORK PRACTICES:

1. Purging and Ventilating These shall be used to control environmental conditions inside the confined space unless the use of ventilation will create a more serious hazard or site conditions make the use of forced air ventilation impossible. The method used will be determined by the hazards, the work to be performed, and design of the confined space. When using purging or ventilation the following guidelines shall be followed:
 - The blower controls shall be at a safe distance from the confined space.
 - An audible warning device shall be installed to signal when there is a ventilation failure.
 - Gas testing will be conducted prior to start-up of a ventilation system to determine what precautions are necessary.

- When a ventilation system is in operation, before each work shift, airflow measurements will be made to ensure that a safe level is maintained.
- Exhaust outlets shall be placed so that workers outside the confined space are not exposed to contaminants in the exhaust.
- Ventilation inlets shall be kept away from exhaust outlets so that contaminants are not re-circulated back into the space. Sources of contamination outside the space are not located near ventilation inlets.
- Ventilation equipment shall be explosion proof and support equipment grounded whenever flammable atmospheres are present.
- The ventilation rate of preventing concentrations flammable gases below 10% of the Lower Explosive Limit (LEL). VII. Lockout/ Tagout:

2. Confined spaces will be completely isolated from all energy sources and any other systems which may release hazardous solids, liquids and gases into the space. Lockout/Tagout procedures all be implemented in accordance with Cox Energy, Industrial Coatings & Cleaning LLC Lockout/Tagout Specific procedures that apply to confined spaces include: When complete isolation is not possible, specific written safety procedures shall be implemented.
3. When blanking is used to seal off a line or pipe, the blank shall be able to withstand four (4) times the maximum working pressure of the line and be fitted with a leak-proof gasket. The gasket shall be made of a chemically non-reactive material.
 - Shut-off valves shall be locked in the closed position and tagged for identification.
 - Pumps and compressors serving the lines entering the confined spaces shall be locked out to prevent accidental activation.
 - Isolating and tagging out requirements for the confined space will be noted on the entry permit.

V. Equipment and Tools:

1. Equipment and tools used in confined spaces shall be in accordance with the following requirements:
 - All equipment, tools and cords will be heavy duty and insulated. All electrical equipment must be inspected for visible defects before using in confined space.
 - All power tools shall be air-driven when flammable atmosphere or flammable liquids are present to lower the risk of explosion.
 - All lighting used will be explosion proof and be equipped with guards. Portable lighting shall not be hung by the cord unless designed to do so.
 - Pumping equipment shall be grounded.

VI. ATMOSPHERIC MONITORING:

1. Before an employee enters the space, the internal atmosphere shall be tested, with a calibrated direct-reading instrument, for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants, in that order. The atmosphere within the space must be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. At a minimum, monitoring shall be conducted at the beginning of each shift and after subsequent breaks. All affected employees shall be notified of the air monitor. Atmospheric monitoring shall be conducted in accordance with the following guidelines:
2. Testing for flammable gases, oxygen deficiency shall be conducted. Due to various densities of different gases, the top, middle and bottom of the confined space must be tested for gas. Example: hydrogen sulfide is heavier than air and will be at the bottom; methane which is lighter than air will be found at the top. Prior to issuing the entry permit, types of tests to be performed, periodicity of testing and instruments to be used will be determined. Information on types of tests conducted, monitoring instrumentation used will be noted on Confined Space Entry Permit. Results of testing conducted for the initial entry and at the beginning of each work shift, shall be noted on the Confined Space Entry Permit and maintained in a separate log sheet. Monitoring conducted during work shall be recorded on log sheet. If monitoring is continuous, then readings shall be noted every half-hour on the air monitoring log. If any

unacceptable atmospheric conditions are present in the space, then appropriate ventilation or respiratory protections must be implemented.

- Oxygen – above 19.5%, LFL – less than 10%, any other atmospheric contaminant below PEL.
- If concentration of flammable gases exceeds 10% of the lower explosive limit or oxygen concentrations exceed 23%, any form of hot work will be prohibited.
- Calibration of monitoring equipment shall be performed in accordance with the manufacturers-instruction manual.
- Results of calibration shall be recorded on the log sheet provided in Attachment B
- Monitoring of the space must inform the entrants of the potential hazards and results shall be logged. Affected employees shall participate in the permit review and signing. Ventilation must be used & testing must be conducted before entry & during work. Continuous monitoring is required where engulfment hazards exist.

VII. RESCUE:

1. Personnel and services necessary to perform rescue shall be identified and in place prior to entry. These services may be provided by the site owner/operator, the company performing the confined space work, or by a third party that specializes in confined space rescue. Local fire departments may not have the means to perform confined space rescue, so do not assume they are able to do so.
 - Procedures for summoning rescue and emergency services shall be developed and implemented to perform rescue, to provide necessary emergency services to rescued employees, and to prevent unauthorized personnel from attempting a rescue.
 - Personnel not trained in rescue procedures and not equipped with the proper equipment, will under **NO CIRCUMSTANCES** be allowed to attempt to enter the confined space for rescue.

2. Under the following conditions, personnel shall be instructed to initiate self-evacuation procedures:
 - The attendant orders an evacuation.
 - Authorized personnel working in the space, perceive they are in danger.
 - Automatic alarms are activated.
 - If for any reason, rescue is unable to be performed by the attendant and support personnel, the attendant shall contact appropriate emergency resources as noted on the entry permit.
 - If relying on outside services for supplying rescue personnel, supervisory personnel responsible for implementing the rescue plan, shall ensure that the designated rescuers are aware of the hazards they may confront when called on to perform a rescue at the job-site.
3. Equipment to be provided to Cox Energy, Industrial Coatings & Cleaning LLC rescue personnel will include the following as a minimum:
 - Self-contained breathing apparatus.
 - Lifelines shall be attached to a hoist if entry through a vertical opening is required unless site conditions make the use of a hoist impractical; in which case other means of retrieval (rescue) will be established.
 - Any other personal protection necessary for safe entry into the space.
4. Rescue services shall be either:
 - a. Provided by the host facility, or
 - b. Provided by an outside service which is given an opportunity to examine the entry site, practice rescue, and decline as appropriate, or
 - c. Provided by the employer by selecting a rescue team that is equipped and trained to perform the needed rescue services.

VIII. Evaluation/Entry Permit:

1. An entry permit is the written or printed document that controls entry into a confined space. Before entry is authorized, an entry permit documenting control measures to protect workers from the hazards in the confined space shall be prepared. Procedures necessary for concluding the entry after entry operations have been completed must be in place. When workers from multiple employers are working in a permit space, procedures shall be implemented to ensure workers from one employer do not endanger workers of another.

2. Before an Entry/Evaluation Permit is issued, the space shall be deemed a Confined Space based on the following criteria a. the space is large enough to bodily enter and do work, and b. the space has limited means of entry and egress, and c. the space is not meant for continuous human occupancy.

3. If the space meets the above criteria and is deemed to be a Confined Space, an Evaluation/Entry permit shall be issued to determine what type of Confined Space it is;

a. Non-Permit Required – no hazards in the space or created by the work in the space, no attendant required.

b. Alternate Permit Space – a space which has only atmospheric hazards that can be controlled with continuous forced air ventilation. This type of space requires continuous air monitoring and recording of results every two hours, no attendant required.

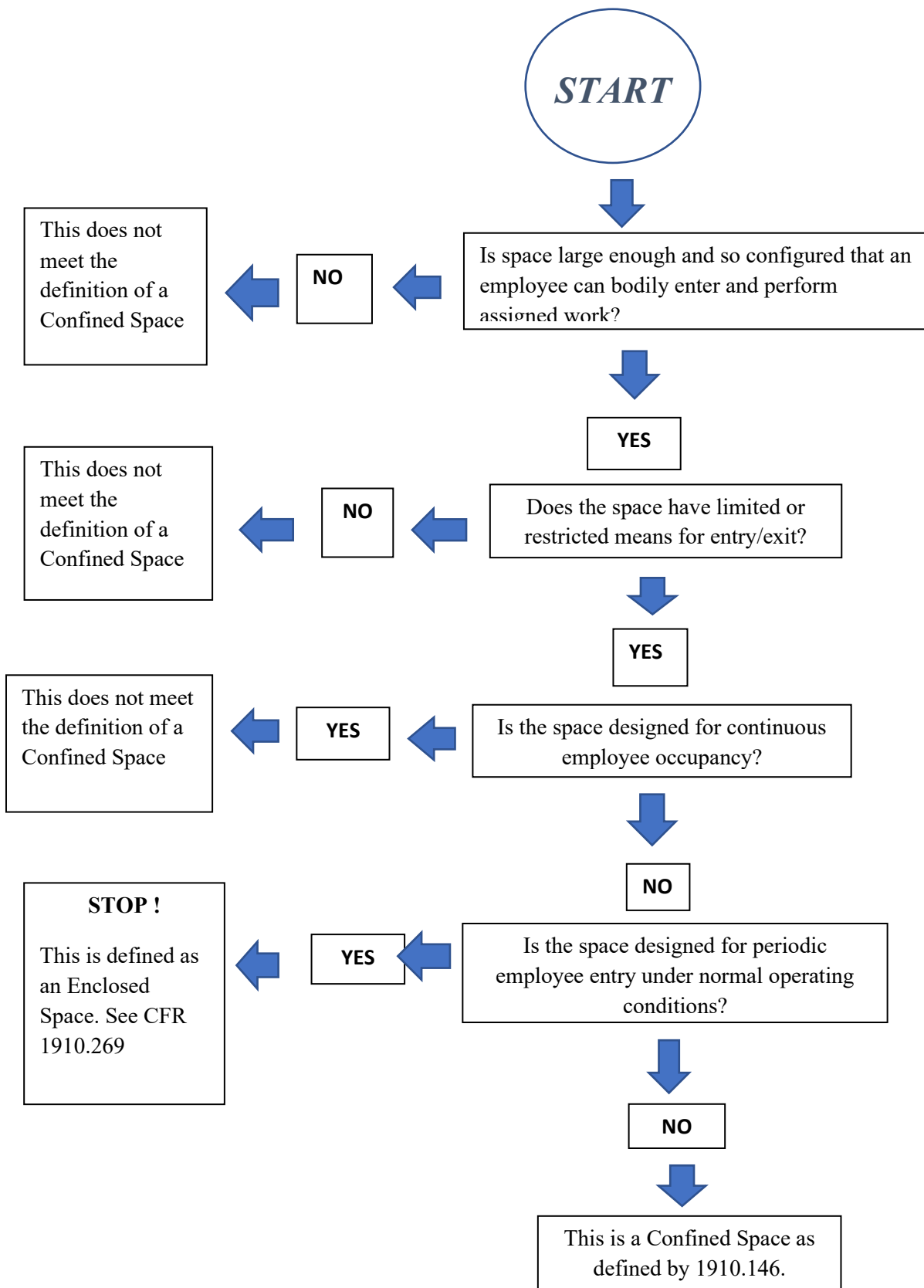
c. Full Permit Required Confined Space- a space that contains an uncontrolled hazard. An attendant and rescue equipment are required.

4. The permit (whatever type) shall be issued by the designated competent person on the jobsite. This permit shall be valid for a period not to exceed 30 days. If the work in the space has not been completed in this time frame, the original permit shall be closed out, the space reevaluated and a new permit shall be issued.

5. The confined space permit may need to be terminated in some situations, such as when new hazards are introduced. Procedures for terminating the permit and closing it out after job completion or if new

hazards arise is the responsibility of the Entry Supervisor. Whenever the work is completed, the Entry/Evaluation Permit shall be closed out by the Entry Supervisor. The Entry/Evaluation permits shall be retained for a period of 2 years.

Flowchart for Determining Confined Spaces



20. LOCKOUT/ TAGOUT POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Control of Hazardous Energy (Lockout/Tagout)

I. Policy:

1. The procedures specified in this section comply with the requirements for the isolation or control of hazardous energy sources set forth in the OSHA standard 29 CFR 1910.147. The accidental release of energy during maintenance work can and frequently does cause severe injuries, amputations, and death. Energy can be present in the form of electricity, potential energy (due to gravity) stored in elevated masses, chemical corrosivity, chemical toxicity, or pressure.

2. The only exceptions (allowed by OSHA to these requirements) are those situations involving “hot tap” operations. For this exception to be valid, Company personnel involved must demonstrate that the continuity of services is essential, that the shutdown of the energy source is impractical, and that documented (written) procedures and special equipment have been implemented that will provide proven effective protection. These procedures apply to all maintenance or installation operations conducted on Company jobsites and shall conform to 29 CFR 1910.147.

II. Lockout Devices:

1. Lockout devices affixed to energy isolating devices are warning devices that provide the physical restraint on those devices that any lock would provide. Any lockout device so attached to an energy isolating device must not be removed without authorization of the person attaching it, and it must never be bypassed, ignored, or otherwise defeated. Tags, used in combination with locks, must be legible and understandable in order to be effective. Tags must be made of materials which will withstand the environmental conditions encountered in the workplace. When utilized, tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use. Tagout devices must be substantial enough to prevent inadvertent or accidental removal.

2. Lockout/Tagout devices must warn against hazardous conditions if the machine or equipment is energized and must include appropriate warnings such as:

***DO NOT START *DO NOT ENERGIZE *DO NOT OPEN**
***DO NOT OPERATE *DO NOT CLOSE**

3. Lockout devices and practices vary by nature and function. Several effective lockout devices and practices are listed as follows:

- a. Padlocks. Key operated padlocks are recommended and shall be assigned individually.
- b. Multiple lock adapters will enable more than one worker to place their own padlock on the isolating device to guarantee that the machine or equipment will remain deactivated until each and every employee completes their own task, and only then will the last padlock be removed.
- c. Chains or other commercially available devices shall be used to prevent valves from being opened or, in some cases, closed. The principle of multiple lock adapters still applies even when chains or other devices are used on operations requiring more than one employee.

III. Procedures:

1. If energy-isolating devices are not capable of being locked out, they must be modified so that they are capable of being locked out whenever major replacement, repair, renovation, or modification of the machine or equipment takes place. Whenever new machines or equipment are installed, energy-isolating devices for such machines or equipment must be designed to accept a lockout device.

2. If an isolating device cannot be locked out for any reason, then additional steps must be taken to ensure full employee protection such as removing fuses, blocking switches, blanking off lines, etc.

3. If machines or equipment is not capable of being locked out, a tagout procedure must be documented and utilized. The tagout procedure must provide full employee protection equivalent to a lockout system. For full employee protection, when a tagout device is used on an energy-isolating device, the device must be attached at the same location that the lockout device would have been attached and must demonstrate that the tagout device will provide a level of safety that is equivalent to that of a lockout system.

4. Normal production operations are not covered by this Lockout/Tagout procedure, Servicing and/or maintenance which takes place during normal production operations is only covered by this procedure if:

- a. an employee is required to remove or bypass a guard or other safety device or,
- b. an employee is required to place any part of his or her body into an area on a machine or piece of equipment where work is actually performed upon the material being processed (point of operation) or where an associated danger zone exists during a machine operating cycle.

5. Plug/Cord and Hose-Connected type equipment;

- a. When servicing or installing plug/cord or hose connected electrical, pneumatic, or hydraulically powered equipment, the cord or hose shall be disconnected from the equipment to be worked on, prior to starting the work. A tag warning against reconnecting the plug or hose shall be affixed to the plug or hose end.
- b. Any stored energy (e.g., capacitor voltage, hydraulic pressure) shall be safely released prior to the start of maintenance or installation work.

6. Electrically Powered Equipment shall be de-energized and their source of electricity manually disconnected from them prior to the removal of protective covers or the start of other maintenance or installation work. It is important to recognize that locking and tagging on/off switches is often not sufficient to prevent accidental start up or prevent voltage from being present in the equipment. If the equipment is not wired properly (i.e., the polarity is reversed) or the switch is of the single pole type, voltage can be present even if the operating switch is in the off position. For these reasons, manual disconnects must be placed in the off position and/or the equipment's power fuses removed from the motor control center.

IV. The Lockout/Tagout (LO/TO) procedure is as follows:

1. Each person working on the circuit or piece of equipment shall place a padlock and warning tag on the electrical isolation device (e.g., disconnect switch). Lockout devices and tagout devices shall indicate the identity of the authorized company employee applying the device(s).

2. Each person working on the circuit or piece of equipment shall attempt to energize or start the piece of equipment prior to starting work. Each on/off switch capable of energizing the equipment must be “tried”.

3. If the try step reveals that the equipment is capable of being energized, the proper disconnects must be located and locked out and the try step repeated.

4. As each person completes his or her task, they shall remove their padlock and tag from the energy isolating device.

5. All protective covers or panels shall be securely re-attached prior to energizing the equipment after work is completed. In the event that protective covers must be removed to make adjustments on energized equipment, appropriate guards must be constructed and attached in such a manner as to prevent employee contact with live circuitry capable of causing human injury. Such guards must be of durable construction, adequate to prevent injurious contact, and remain in place at all times that the equipment is energized.

6. The LO/TO shall be periodically inspected, at least annually, by an authorized company employee, other than ones utilizing the energy control procedure being inspected, to ensure that the procedures and requirements of CFR 1910.147 (OSHA Standard) are being followed. The periodic inspections shall be conducted to correct any deviations or inadequacies identified. Where lockout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected. Where tagout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized and affected employee, of that employee's responsibilities under the energy control procedure being inspected. The company will certify that the periodic inspections have been performed. The certification will identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection, and the person performing the inspection. Finally, these periodic inspections shall be documented.

7. Specific procedure shall be documented for the effective and efficient shutdown and isolation of all equipment that requires servicing or maintenance in which the unexpected energization or start-up of the machine or equipment, or release of stored energy could cause injury to employees.

8. In preparation for shut-down, the authorized person shall review all documentation pertaining to the shut-down to ensure that all potential stored energy sources can be effectively isolated and de-energized.

9. The machine or equipment shall be turned off or shutdown using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage. The authorized personnel performing work on the cleared equipment shall verify that the equipment is isolated and that all stored energy is dissipated and that if there is any indication that any energy is re-accumulating, all work will immediately stop and the equipment will be checked and rendered safe to continue the work.

10. Each authorized company employee must place his or her personal lock and/or tag (LOTO) on each group lockout/tagout device prior to commencing any servicing or maintenance operation. The supervisor responsible for the group lockout/tagout is forbidden to remove the group LOTO device until each authorized employee in the group has removed his or her personal device. When more than one crew, craft, department, etc. is involved, overall job-associated lockout or tagout control must be assigned.

11. All energy isolating devices that are needed to control the energy to the machine or equipment must be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

12. Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy must be relieved, disconnected, restrained, and otherwise rendered safe. If there is a possibility of reaccumulation of stored energy to a hazardous level, verification of isolation must be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists.

13. Prior to starting work on machines or equipment that have been locked out or tagged out, the authorized company employee shall verify that isolation and deenergization of the machine or equipment has been accomplished.

V. Chemical and/or Pressurized Lines:

1. Prior to working on any pressurized line or a line containing a toxic, flammable, reactive, or corrosive material, the following procedure must be implemented:

- a. The line to be serviced must have two block valves upstream of the work area or device to be serviced or installed, placed in the closed position and tagged. The bleed valve (between the two block valves) shall be opened and tagged so that leakage of the valve upstream would be readily obvious. The line shall be depressurized or drained in a safe manner. Lines shall be broken in such a manner as to release pressure away from the employee. All solids or liquids drained shall be safely collected. This procedure is called “double block and bleed.”
- b. If it is possible for pressure or line material to enter the work area from more than one direction, the line in each direction of travel shall be “double blocked and bled” as described above.
- c. In the event that “double blocked and bleed” procedures are infeasible (i.e., the line is not provided with adequate valving), alternative measures shall be implemented. One alternate measure is to place a solid “blind” in a flange located between the available upstream valve and the work area. If blinds are used, they shall be sufficiently corrosion and pressure-resistant to ensure that if the valve leaks, the blind will stop the material or pressure from reaching the work area.

VI. Stored Mechanical Energy:

In situations where equipment to be worked on has stored mechanical energy (e.g., in a flywheel or drop hammer), the stored energy must be released or blocked in a safe manner before starting maintenance or installation work. Effective blocking practices may include the installation of safety blocks or adequate supports. Under no circumstances will “bumper jacks” or “scissor jacks” be considered to be adequate blocks.

VII. Training:

1. The employer shall provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The employer shall certify that

employee training has been accomplished and is being kept up to date. The certification shall contain each employee's name and dates of training.

2. The purpose in providing training to employees is to ensure that they understand the purpose and function of the lockout/tagout program and procedures, and that they have the knowledge and skills required for the safe application, usage, and removal of energy controls.

3. Personnel who work around electrical equipment but who do not perform a primary duty of electrical system installation or maintenance will be briefed by their supervisor on the hazards of electricity and the proper precautions to observe.

4. Each authorized employee who will use a lockout/tagout procedure must receive training. Before an authorized or affected company employee turns off a machine or equipment, the authorized employee must have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means to control the energy. The machine or equipment must be turned off or shut down using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to company employees as a result of the equipment stoppage.

5. Retraining shall be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard, or when there is a change in the energy control procedures. Additional retraining shall also be conducted whenever a periodic inspection reveals, or whenever the employer has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

6. All LO/TO training shall be performed by a competent person who is familiar with the LO/TO procedure. The training shall be performed at least annually or whenever there is a change in the LO/TO procedure.

7. All training shall be documented, signed & dated by the trainer, include a list of trainees and be certified by the site manager.

21. ABRASIVE BLASTING POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Abrasive Blasting Procedure

I. Scope:

Cox Industrial Coatings & Cleaning LLC shall protect employees from the **Hazards of Abrasive Blasting Materials**. Abrasive Blasting is defined as; using compressed air or water to direct a high velocity stream of an abrasive material to clean an object or surface, remove burrs, apply a texture, or prepare a surface for the application of paint or other type of coating. Cox Industrial Coatings & Cleaning LLC shall protect workers from exposure too hazardous dust levels and toxic metals that may be generated from both the blasting material and the underlying substrate and coatings being blasted. Exposure of employees to inhalation, ingestion, skin absorption, or contact with any material or substance at a concentration above those specified in the "Threshold Limit Values of Airborne Contaminants for 1970" of the American Conference of Governmental Industrial Hygienists, shall be avoided. This procedure provides the information required on abrasive blasting material, health hazards, and methods to protect workers.

II. Abrasive Blasting Materials:

1. The decision to use a certain type of abrasive material will depend on many factors such as cost, job specifications, environment, and worker health.

Commonly used abrasive materials:

- Coal slag
- Garnet sand
- Nickel slag
- Copper slag
- Glass (beads or crushed)
- Steel shot
- Steel grit
- Specular hematite (iron ore)

1. Alternative, less toxic blasting materials include:

- Ice cubes
- Dry ice
- Plastic bead media
- Sponge
- Sodium bicarbonate (baking soda)
- Ground walnut shells, ground corn cob and other biodegradable materials
- High pressure water.

2. Abrasives and surface coatings on the materials blasted are shattered and pulverized during blasting operations and the dust formed will contain particles of respirable size. The composition and toxicity of the dust from these sources shall be considered in making an evaluation of the potential health hazards. The blast nozzle shall be bonded and grounded to prevent the build-up of static charges. The blast cleaning nozzles shall be equipped with an operating valve which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.

III. Health Hazards Abrasive:

1. Abrasive blasting operations can create high levels of dust and noise. Abrasive material and the surface being blasted may contain toxic materials (e.g., lead paint, silica) that are hazardous to workers. Silica sand (crystalline) can cause silicosis, lung cancer, and breathing problems in exposed workers. Coal slag and garnet sand may cause lung damage similar to silica sand (based on preliminary animal testing). Copper slag, nickel slag, and glass (crushed or beads) also have the potential to cause lung damage. Steel grit and shot have less potential to cause lung damage. Slags can contain trace amounts of toxic metals. Abrasive blasting creates high levels of dust if not properly contained.

IV. Protecting Employees from Potential Exposure to Abrasive Blasting Materials:

1. Each abrasive blasting operation is unique, involving different surfaces, coatings, blast material, and working conditions. Before beginning work, Cox Industrial Coatings & Cleaning LLC shall identify the hazards of the abrasive blasting operation and assign a **competent person** trained to recognize the hazards associated with the operation and with the authority to quickly take corrective action to eliminate them. Cox Industrial Coatings & Cleaning LLC shall use a combination of engineering and administrative controls, work practice controls, personal protective equipment (PPE), including respiratory protection, and training to protect workers involved in abrasive blasting activities. Engineering controls, such as substitution, isolation, containment, and ventilation are the primary means of preventing or reducing exposures to airborne hazards during abrasive blasting operations. Administrative controls, including the use of good work and personal hygiene practices, can also reduce exposure. When engineering and administrative controls cannot keep exposures to hazardous materials below OSHA permissible exposure limits, respiratory protection shall be used. Caution: Abrasive blasting creates high levels of noise that can cause substantial hearing loss, hearing protection shall

meet the requirements of the exposure assessment. Cox Industrial Coatings & Cleaning LLC shall administer a hearing conservation program as required by the OSHA Occupational Noise standard to ensure employees are not exposed to noise levels at or above the action level as required by OSHA Std, CFR 1926.

2. Engineering Controls

- a. Substitution: Use a less toxic abrasive blasting material. Use abrasives that can be delivered with water (slurry) to reduce dust. Blastox is the preferred blasting media. Silica sand is expressly forbidden to used as a blasting agent.
- b. Isolation and Containment: Use barriers and curtain walls to isolate the blasting operation from other workers. Use blast rooms or cabinets for smaller operations. Use restricted areas for non-enclosed blasting operations. Keep coworkers away from the blaster.
- c. Ventilation: Use exhaust ventilation systems in containment structures to capture dust. Administrative Controls Perform routine cleanup using wet methods or HEPA filtered vacuuming to minimize the accumulation of toxic dusts. Do not use compressed air to clean as this will create dust in the air. Clean and decontaminate tarps and other equipment on the worksite. Schedule blasting when the least number of workers are at the site. Avoid blasting in windy conditions to prevent the spread of any hazardous materials.
- d. Personal Hygiene Practices: Prohibit eating, drinking, or using tobacco products in blasting areas. Provide wash stations so workers can wash their hands and face routinely and before eating, drinking, or smoking. Vacuum (HEPA) or remove contaminated work clothes before eating, drinking or smoking. Abrasive blasting using a dust collection system with multiple exhaust ducts. clothing and equipment. Keep contaminated clothing and equipment out of the clean change area. Respiratory Protection; An abrasive-blasting respirator must cover the wearer's head, neck, and shoulders to protect the wearer from rebounding abrasive. Compressed air shall not be used for cleaning purposes except where the pressure is reduced to less than 30 p.s.i and a chip deflector is incorporated in the nozzle.

3. Personal Protective Equipment:

a. Workers shall use only respirators approved by NIOSH to provide protection from dusts produced during abrasive-blasting operations. Type E NIOSH-certified blasting airline respirator with positive pressure blasting helmet. Air for abrasive-blasting respirators must be free of harmful quantities of dusts, mists, or noxious gases. Support personnel involved in cleanup and other related activities shall also wear respiratory protection as required by the exposure assessment. Personal Protective Equipment shall include; Hearing protection, Eye and face protection. Hard Hat, Leather gloves that protect to full forearm and aprons (or coveralls), and Safety shoes or boots. Equipment for protection of the eyes and face shall be supplied to any other personnel working in the vicinity of abrasive blasting operations. A respiratory protection program shall be established wherever it is necessary to use respiratory protective equipment including worksite-specific procedures and elements for required respirator use. Abrasive blasting respirators shall be worn by all abrasive blasting operators under certain conditions. Equipment for protection of the eyes and face shall be supplied to the operator when the respirator design does not provide such protection.

3. Employee Training and Hazard Communication:

Cox Industrial Coatings & Cleaning LLC shall provide training to all employees before the blasting operation commences, (abrasive blasters and support personnel) on blasting health and safety hazards, how to use controls, personal hygiene practices, safe work practices and the use of PPE and respirators. Cox Industrial Coatings & Cleaning LLC shall include appropriate health hazard information on the blasting materials on safety data sheets (SDS) as required under OSHA's Hazard Communication standard (29 CFR 1910.1200).

22. NOISE EXPOSURE/ HEARING CONSERVATION POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Noise Exposure/Hearing Conservation Policy:

I. PURPOSE:

1. This purpose of this hearing conservation program is to prevent occupational hearing loss in Cox Energy, Industrial Coating & Cleaning LLC employees and comply with the Federal OSHA Standard 29 CFR 1910.95 - Occupational Noise Exposure.

2. The Occupational Safety and Health Administration (OSHA) Occupational Noise Exposure standard 29 CFR 1910.95 establishes a permissible exposure limit (PEL) for occupational noise exposure, requirements for audiometric testing, hearing protection (PPE), and employee training if those sound levels are exceeded. This regulation defines an "action level" (AL) as a "dose" of 50%, which is equivalent to an eight-hour time weighted average (TWA) of 85 dBA. **When noise levels exceed this amount, an effective hearing conservation program shall be implemented.**

II. Employee Training:

1. Cox Energy, Industrial Coating & Cleaning LLC will conduct an annual hearing conservation training program for each employee included in the hearing conservation program as described in Article I, Paragraph 2 above. The training program will include information on:

- a. The effects of noise on hearing.
- b. The purpose and use of hearing protectors.
- c. The advantages, disadvantages, and attenuation of various types of protection (PPE).
- d. Instruction in the selection, fitting, use and care of protectors.
- e. The purpose of audiometric testing and an explanation of the test procedures.

2. The employer shall make available to the affected employees copies of the noise exposure procedures and shall also post a copy in the workplace. The

employer shall also allow the Assistant Secretary and the Director access to the records.

3. Information provided in the training program shall be updated to be consistent with changes in protective equipment and work processes.

III. NOISE MONITORING:

1. Noise measuring shall be done to see if employees are being exposed to noise that is 85 dBA or louder on an eight hour time weighted average (TWA). This measuring can be either sampling performed when needed, or monitoring performed all the time.

2. If an employee is exposed to noise that is 85 dBA or louder on an eight hour time weighted average (TWA), then that employee must be included in a hearing conservation program.

3. All continuous, intermittent and impulsive sound levels from 80 decibels to 130 decibels shall be integrated into the noise measurements.

4. Instruments used to measure employee noise exposure shall be calibrated to ensure measurement accuracy.

5. Monitoring shall be repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that:

- a. Additional employees may be exposed at or above the action level;
or;
- b. The attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements of the OSHA Standard.

6. The employer shall notify each employee exposed at or above an 8-hour time-weighted average of 85 decibels of the results of the monitoring.

7. The employer shall provide affected employees or their representatives with an opportunity to observe any noise measurements conducted.

8. The employer shall establish and maintain audiometric testing by making audiometric testing available to all employees whose exposures equal or exceed an 8-hour time-weighted average of 85 decibels. In addition, the company requires

that audiometric testing must be performed annually for employees that are exposed to 85 dBA as an eight-hour time weighted average or greater.

9. The program, hearing protectors and replacements as necessary shall be provided at no cost to affected employees.

10. Within 6 months of an employee's first exposure at or above the action level of 85 dBA as an eight-hour time weighted average (TWA), a valid baseline audiogram shall be established against which subsequent audiograms can be compared. When a mobile van is used, the baseline shall be established within 1 year.

11. Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protection may be used to meet the requirements. Employees shall also be notified to avoid high levels of noise.

12. At least annually after obtaining the baseline audiogram, the employer shall obtain a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels. Each employee's annual audiogram shall be compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred. If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift has occurred, the company shall inform the employee of this fact in writing, within 21 days of the determination.

13. Audiometric tests shall be performed by a licensed or certified audiologist, otolaryngologist, or other physician, or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation, or who has satisfactorily demonstrated competence in administering audiometric examinations, obtaining valid audiograms, and properly using, maintaining and checking calibration and proper functioning of the audiometers being used. A technician who operates microprocessor audiometers does not need to be certified. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist or physician.

IV. AUDIOMETRIC EVALUATION:

1. Each employee's annual audiogram will be compared to his/her baseline audiogram by qualified evaluator to determine if a Standard Threshold Shift (STS) has occurred. This comparison may be made by a technician.

2. A Standard Threshold Shift is defined by OSHA as a change in hearing threshold relative to the baseline of an average of 10dB or more at 2000, 3000, and 4000 Hz either ear.

3. In determining if a Standard Threshold Shift has occurred, an allowance can be made for the contribution of aging (presbycusis). The age correction values to be used are found in Appendix F of 1910.95.

4. The audiologist, otolaryngologist, or physician shall review problem audiograms and shall determine whether there is a need for further evaluation. The employer shall provide to the person performing this evaluation the following information:

- a. A copy of the requirements for hearing conservation as set forth in the standard.
- b. The baseline audiogram and most recent audiogram of the employee to be evaluated.
- c. Measurements of background sound pressure levels in the audiometric test room as required in Appendix D: Audiometric Test Rooms.
- d. Records of audiometer calibrations

5. If the annual audiogram shows that an employee has suffered a standard threshold shift, the employer may obtain a retest within 30 days and consider the results of the retest as the annual audiogram.

6. Unless a physician determines that the standard threshold shift is not work-related or aggravated by occupational noise exposure, the employer shall ensure that the following steps are taken when a standard threshold shift occurs:

- a. Employees not using hearing protectors will be fitted with hearing protectors, trained in their use and care, and required to use them if they are exposed to an 8-hour TWA average sound level of 85 decibels or greater.

- b. Employees already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary.
- c. The company shall inform the employee, in writing, within 21 days of this determination of the existence of a Standard Threshold Shift. A copy of the STS letter will also be sent to the employee's supervisor.
- d. The employee shall be referred for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if the company suspects that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors..
- e. Cox Energy, Industrial Coating & Cleaning LLC shall counsel the employee on the importance of using hearing protectors and refer the employee for further clinical evaluation if necessary.

7. Persistent significant threshold shifts shall be entered on the OSHA 300 Log if determined to be work related.

8. If subsequent audiometric testing of an employee whose exposure to noise is less than an 8-hour TWA of 90 decibels indicates that a Standard Threshold Shift is not persistent, the company:

- a. Shall inform the employee of the new audiometric interpretation.
- b. May discontinue the required use of hearing protectors for that employee.

9. The company shall evaluate hearing protector attenuation for the specific noise environments in which the protector will be used.

V. Personal Protective Equipment (PPE):

1. Hearing protection shall be replaced as necessary. Employers shall ensure that hearing protectors are worn. Employees shall be properly trained in the use, care & fitting of protectors.

2. Hearing protectors are available to all employees exposed to an 8-hr. time-weighted average of 85 decibels at no cost to the employee.

3. Cox Energy, Industrial Coating & Cleaning LLC shall evaluate hearing protection for the specific noise environments in which the protective devices will be used.

4. Accurate records of all employee audiometric and exposure measurements shall be maintained as required by the regulation.

5. Access to records. All records required by this section shall be provided upon request to employees, former employees, representatives designated by the individual employee, and the Assistant Secretary for Labor.

VI. PROGRAM EVALUATION:

At least annually, the Hearing Protection Program shall be evaluated by Cox Energy, Industrial Coating & Cleaning LLC. After the evaluation, the changes/revisions to the program deemed necessary will be made in a timely manner.

23. LEAD ABATEMENT/ REMOVAL POLICY

Cox Energy, Industrial Coatings & Cleaning, LLC

Lead Abatement/Removal Policy

I. Policy Statement:

1. In the event that employees of Cox Energy, Industrial Coatings & Cleaning LLC shall be exposed to potentially dangerous concentrations of lead due to the nature of our cleaning processes or work on multi-contractor work sites and the potential of being exposed as a result of proximity, we shall maintain a lead compliance program in accordance with OSHA 1926.62. Cox Energy, Industrial Coatings & Cleaning LLC may perform work that would initiate lead disturbances and will try to limit, to the best of our ability, any potential exposures.
2. The facility host shall identify all surfaces or materials that contain metals of toxic significance, (Lead, Cadmium, Zinc, etc.). Cox Energy, Industrial Coatings & Cleaning LLC personnel shall not disturb in any fashion, any material or surface so designated by the facility host. Identification can be by signage, MSDS, labels or any means feasible to convey the presence of metals of toxic significance.
3. No employee shall be exposed to lead at concentrations greater than fifty micrograms per cubic meter of air averaged over an 8-hour period.

II. Employee Training:

1. Lead Abatement/Removal training is required for employees whose work activities may contact lead containing materials and potentially disturb the material during their work activities
2. Training shall be accomplished by any feasible means that meets the requirements of CFR 1910.62(l)(2) and includes; the content of the Lead Standard and its appendices, specific nature of operations that could result in exposure to lead or other toxic metals above the action level, the uses and limitations of PPE including respiratory protection to minimize potential exposures, purpose and description of medical surveillance programs, potential health effects of over exposure to lead and other toxic metals, and any engineering or work practice controls used to prevent occupational exposure to lead and other toxic metals. This training shall also apply to the other listed materials of toxic significance.

3. Employees with potential exposure to airborne lead at any level shall be informed of the content of Appendices A and B of the Regulation. Employees must be included if exposure to lead is at or above the action level, or if the possibility of skin or eye irritation exists. The company shall provide initial training prior to the time of initial job assignment. The training program shall be repeated at least annually for each employee.

4. Training shall be documented including dates of training, employee name, and trainer name.

5. The training program must include possible locations of lead containing materials such as leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.

III. Health Hazards:

1 There are two primary ways that lead enters the body, inhalation and ingestion. Inhalation is fairly self-explanatory and controllable with the use of well-fitted respirators. Ingestion is usually through hand-to-mouth activities, and needs to be clarified as to how easily transmission can occur. It is easy to overlook how often people put their hands either close to or near their mouths. It is also imperative that the showering and/or washing of the hands be closely followed to prevent blood contamination. It is extremely important that all workers in exposure situations follow closely all protective equipment guidelines and working procedures, for two reasons. First, to keep themselves safe and second, to avoid taking lead contamination home to their families.

2. Cox Energy, Industrial Coatings & Cleaning LLC Lead Abatement/Removal Policy identifies the health effects of lead exposure. Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache, joint or muscle aches, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

IV. Work Practices:

1. Housekeeping - The OSHA Standard requires all surfaces be maintained as free as possible of lead accumulations. This is accomplished by;

- HEPA filtered vacuuming cleaning methods where feasible.

- Wet wiping surfaces
- Shoveling, dry or wet sweeping or brushing only when HEPA vacuums are not feasible.
- Compressed air only in conjunction with ventilation.
- Blowdown only in ventilated containment.

2. The site-specific compliance program shall address means of engineering controls & work practice controls, air monitoring, and a description of each operation in which lead is potentially emitted. The written program shall be revised & updated as required.

3. Employees on multi-contractor work sites shall be protected from potential exposures to metals of toxic significance by the facility host. This protection shall include demarcation of work areas with OSHA required signage and direct communication with Cox Energy, Industrial Coatings & Cleaning LLC personnel.

4. Cox Energy, Industrial Coatings & Cleaning LLC shall not disturb lead containing materials. However, when Cox Energy, Industrial Coatings & Cleaning LLC work practices have the potential to disturb surfaces or materials that contain metals of toxic significance, appropriate engineering controls and/or work practice controls shall be instituted to bring potential exposure levels down to the lowest feasible levels. All suspect surfaces will be sampled by using accepted sampling and analytical methods and results reported in either parts per million (PPM) or percentage (%) of material. **Under no circumstances are “lead swabs” to be used to identify lead free paints or coatings.** If need be, appropriate PPE including respiratory protection shall be implemented to insure employee safety. Under no circumstances will a Cox Energy, Industrial Coatings & Cleaning LLC employee be intentionally exposed above the Permissible Exposure Limit (PEL) to any metal of toxic significance.

5. All employees shall practice good personal hygiene and shall wash their hands and face if lead containing materials are contacted, and before any hand to mouth activities (smoking, eating, drinking, handling chewing gum, etc.).

6. If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, Cox Energy, Industrial Coatings & Cleaning LLC shall either remove the employees from the

area until the enclosure breach is repaired or perform an initial exposure assessment.

7. Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials. Appropriate work practices must be followed to ensure the lead containing materials are not disturbed.

8. Warning signs, with required OSHA verbiage shall be posted in lead work areas.

The employer shall post the following warning signs in each work area where the PEL is exceeded:

**DANGER
LEAD
MAY DAMAGE FERTILITY OR THE UNBORN CHILD
CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM
DO NOT EAT, DRINK OR SMOKE IN THIS AREA**

9. Lunchroom, hygiene, shower, and changing facilities must be provided when exposures are at or above the PEL.

V. Personal Protective Equipment (PPE):

1. Protective Work Clothing - The two primary reasons for using protective attire are to minimize potential for ingestion of lead, and to prevent the employee from taking lead dust home. Employees will use-either disposable coveralls or reusable washable coveralls.

2. If an employee has the potential to be exposed to lead at or above the PEL, the company shall provide at no cost to the employee, and assure that the employee uses, appropriate protective work clothing and equipment such as, but not limited to: a) Coveralls or similar full-body work clothing; b) Gloves, hats, and shoes or disposable shoe coverlets; and c) Face shields, vented goggles, or other appropriate protective equipment. Protective clothing shall be cleaned and laundered at least weekly. Clothing shall also be properly disposed and repaired or replaced as necessary.

3. The company must provide appropriate respirators. Employees must be provided with: a) full face-piece respirators instead of half mask respirators for protection against lead aerosols that cause eye or skin irritation at the use

concentrations. b) HEPA filters for powered and non-powered air-purifying respirators. c) Powered air-purifying respirator (PAPR) instead of a negative pressure respirator when an employee chooses to use a PAPR and it provides adequate protection to the employee. Respirators shall be used during the time period necessary to install or implement engineering or work practice controls, where engineering and work practice controls are insufficient, and in emergencies.

VI. Air Monitoring:

1. Full shift personal samples shall be representative of the monitored employee's regular, daily exposure to lead. If the initial determination or subsequent monitoring reveals employee exposure to be at or above the action level but below the permissible exposure limit, the company shall repeat monitoring at least every 6 months. The employer shall continue monitoring at the required frequency until at least two consecutive measurements, taken at least 7 days apart, are below the action level at which time the employer may discontinue monitoring for that employee. If the initial monitoring reveals employee exposure is above the permissible exposure limit, the company shall repeat monitoring quarterly. They shall continue monitoring at the required frequency until at least two consecutive measurements, taken at least 7 days apart, are below the PEL but at or above the action level at which time the employer shall repeat monitoring for that employee. Employees must be notified within 15 working days after the receipt of the results of monitoring performed, either individually in writing or by posting the results in an appropriate location that is accessible to affected employees. Whenever the results indicate that the representative employee exposure, without regard to respirators, exceeds the permissible exposure limit, the company shall include in the written notice a statement that the permissible exposure limit was exceeded and a description of the corrective action taken or to be taken to reduce exposure to or below the permissible exposure limit.

VII. Medical Surveillance Program:

1. A medical surveillance program shall be implemented for all employees who are or may be exposed at or above the action level for more than 30 days per year. The company shall assure that all medical examinations and procedures are performed by or under the supervision of a licensed physician. The company shall

provide the required medical surveillance without cost to employees and at a reasonable time and place.

2. Employees must be removed from having exposure to lead at or above the action level when:

a. Blood lead at or above 50 ug/dl for 2 consecutive blood tests collected within two weeks apart. Employee may return to lead work after two consecutive tests below 40 ug/dl.

3. If a Cox Energy, Industrial Coatings & Cleaning LLC employee is exposed to levels at or above the OSHA action level, blood sampling & monitoring shall be conducted every 6 months until two consecutive blood samples & analysis are acceptable. The sampling & monitoring should be performed at least monthly during the removal period. Any employee with elevated blood levels should be temporarily removed.

4. Notify each affected employee of results within 5 days of sample results.

VIII. Recordkeeping:

1. The employer shall establish and maintain an accurate record of all monitoring and other data used in conducting employee exposure assessments as required in paragraph (d) of this section.

2. Exposure monitoring records shall include:

a. The date(s), number, duration, location and results of each of the samples taken if any, including a description of the sampling procedure used to determine representative employee exposure where applicable;

b. A description of the sampling and analytical methods used and evidence of their accuracy;

c. The type of respiratory protective devices worn, if any;

d. Name and job classification of the employee monitored and of all other employees whose exposure the measurement is intended to represent; and

e. The environmental variables that could affect the measurement of employee exposure.

f. Cox Energy, Industrial Coatings & Cleaning LLC shall maintain monitoring and other exposure assessment records in accordance with the provisions of 29 CFR 1926.33.

24. GENERAL WASTE MANAGEMENT POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

General Waste Management Practices:

- I.** All jobs shall be evaluated, before they begin, to ensure all materials that are to be used are identified and reviewed for specific safety and health hazards, and to determine the appropriate safety and health control procedures required to protect employees from the identified hazards. The amount of waste that will be generated shall be estimated prior to work being performed so that the need for containers and waste removal, if necessary, can be determined. Essentially, the same wastes or scrap materials shall be generated for every project. Waste materials shall be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.
- II.** All materials shall be evaluated, before the job begins, with respect to any hazardous wastes aspects they may have. These hazardous wastes aspects shall include, but are not limited to; listed wastes, inhalation or absorption materials, explosive or flammable wastes, biological wastes, or radiological wastes.
- III.** All employees exposed to safety and health hazards associated with waste materials, whether hazardous or not, shall receive training regarding the proper handling, storage, and disposal of these wastes. This training shall include general instruction on disposal of non-hazardous wastes, trash or scrap materials. If wastes generated are classified as hazardous, employees shall be trained to ensure proper handling, storage, and disposal. Site specific training by the facility host may also be required and must be completed before the job begins.
- IV.** All wastes generated by Cox Energy, Industrial Coatings & Cleaning LLC personnel shall be of the general waste or miscellaneous waste category and shall not require any special precautions other than proper disposal.
- V.** Potential wastes generated by Cox Energy, Industrial Coatings & Cleaning personnel shall be limited to; small quantities of flashlight batteries, wiping rags (completely dry with no free running liquids), aerosol cans (completely drained of material and propellant, and punctured), and scrap paper or cardboard. These materials shall be

placed in the waste streams of the facility host if required or permitted. If the disposal of waste material is not permitted at the site of the facility host, Cox Energy, Industrial Coatings & Cleaning personnel shall return the material to their Roane County, WV facility for proper disposal.

- VI.** All materials used by Cox Energy, Industrial Coatings & Cleaning LLC personnel shall be properly packaged and manifested in accordance with DOT rules and classified as ORM materials for transportation if the quantities exceed specified amounts.

All wastes that can be reused or recycled shall be properly handled, organized, and stored in a manner that will minimize their impact on the environment and is conducive to the “Green” concept. The employer shall encourage proper segregation of waste materials to ensure opportunities for reuse or recycling.

25. FIRE SAFETY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Fire Safety Plan:

I. Purpose:

The purpose of the Fire Safety Plan is to prevent potential injuries and deaths, and to protect the Cox Energy Industrial Coatings & Cleaning LLC property from damage or loss due to fire. This plan includes fire prevention, building exits, fire extinguishing, emergency evacuation, and employee training. This plan shall be reviewed with all new employees when they begin their job assignment and with all employees when the plan is changed.

II. Fire Prevention:

Our first line of defense against fire is to prevent it in the first place. It is the responsibility of all employees to prevent fires. All employees will be appraised of the potential fire hazards in their work area and will be trained in safe work procedures and practices. Employees are required to follow proper procedures to prevent fires and to notify their supervisor or other management personnel if they observe any condition that could lead to the ignition of a fire or could increase the spread of a fire.

The following are some general fire prevention practices and procedures that shall be followed:

- All ignition sources (i.e., open flames, cutting torches, spark producing equipment, electric motors, heating equipment, etc.) shall be controlled. All contact of ignition sources with combustible and flammable materials will be avoided. All employees will keep all combustible materials at least five feet from such ignition sources and all flammable liquids at least twenty feet away.
- Extensive use of electrical extension cords should be avoided. Any damaged or frayed electrical wiring, equipment cords, extension cords, etc. will be removed from service immediately and replaced or repaired.
- Any use of flammable liquids will be done in a manner that prevents spills and prevents the flammable liquid or its vapor or spray from coming into contact with any ignition source. All flammable liquids shall be stored in proper flammable liquid storage containers and kept in the proper storage cabinets.
- Housekeeping and storage practices are critical to preventing fires. Any combustible materials will be stored in neat stacks with adequate aisle space provided to prevent the easy spread of fire and to allow for access to

extinguish any fire that may start. Trash, scrap, and other unnecessary combustibles must be cleaned up immediately and placed in proper disposal containers.

- Smoking is restricted to designated areas.

III. Company Fire Exits:

- Each area of the building/work site shall have at least two means of escape and are to be used in a fire emergency. The location of exits and the path of egress (escape) will be shown on maps (and posted throughout the building /worksite as necessary).
- Fire exit doors shall not be blocked or locked during business hours in order to prevent their emergency use (when employees are within the building).
- Exit routes from the work site will be clear and free of obstructions. All exits are marked with signs designating exits from the premises.

IV. Fire Extinguishers:

- Each area of the Company will have a full complement of the proper type of fire extinguisher for the fire hazards present. All fire extinguishers will be inspected annually by a fire protection equipment company and tagged with the date of inspection. If a fire extinguisher is used or discharged for any reason, it will be removed from service and replaced with another properly charged fire extinguisher while it is being recharged.
- Employees who are expected or anticipated to use fire extinguishers will be instructed on the hazards of fighting fires, how to properly operate the fire extinguishers available, and what procedures to follow in alerting others to the fire emergency. These employees will only attempt to extinguish small incipient fires. If a fire cannot be immediately and easily extinguished with a fire extinguisher, the employees will evacuate the building. They will not try to fight the fire! All employees who are not trained and designated to fight fires are to immediately evacuate the premises at the first sign of fire or initiation of the fire alarm and are prohibited from using an extinguisher and re-entering the premises.

V. Emergency Fire Evacuation:

1. If any employee discovers a fire or smoke, the employee shall immediately report it. If there is time and it is safe to do so, the employee will contact a member of Management to report the fire. Management will then make an announcement over the public address system/radio that all employees and customers are to evacuate the

building/work - site. Management will then call 911 and report the fire to the fire department.

2. If a fire alarm sounds or a fire is otherwise announced, all employees (except those designated and trained to use fire extinguishers) are expected to immediately exit the premises by proceeding to the nearest exit in an orderly fashion. If the nearest exit is blocked by fire or smoke, the employees shall proceed to an alternate exit. There shall be no running, shouting, pushing, etc. A calm orderly evacuation is the safest for all concerned.
3. Upon exiting the building/worksites, all employees and personnel are to proceed to the designated meeting area(s) away from the building, so as not to hamper access by fire fighters, and in order to be accounted for.
4. Supervisors and managers will account for all of their employees to ensure that no one is unaccounted for.
5. Special procedures shall be established, when necessary, for assisting physically impaired employees in an emergency. This will be done on a case by case basis when the employee is first hired or when the physical impairment first occurs.

VI. Employee Training:

1. All new employees shall receive fire prevention and emergency evacuation training when they are hired. When the company provides portable fire extinguishers for employee use, Cox Energy Industrial Coatings & Cleaning LLC shall provide training to familiarize employees with the general principles of fire extinguisher use and the hazards associated with basic firefighting. All employees shall also receive refresher training and a review of this plan on an annual basis.
2. The Company shall hold fire drills and will include a practice evacuation of the building/worksites at least annually. These drills will be used to evaluate employee response and behavior and will help us determine where more training is needed.
3. Those employees who are designated and authorized to use fire extinguishers to fight small fires shall receive training in the proper use of extinguishers, how to extinguish a fire, the hazards involved in fighting fires, when not to fight a fire, and when to evacuate the area. Employees

who are expected to use fire extinguishers in case of emergency shall be trained during their orientation. Refresher training shall occur at least annually.

4. The Safety and Health Coordinator shall administer the Company's fire prevention and life safety inspection programs. This includes reviewing all job/work sites to ensure compliance with applicable state, local, and national fire and life safety standards.
5. Fire prevention measures propose to reduce the incidence of fires by eliminating opportunities for ignition of flammable materials.

VII. Flammable and Combustible Materials:

1. All flammables will be stored in OSHA-approved flammable storage cabinets or stored outside (at least 20 feet from any structure)
2. Fuels, solvents and other flammables (not stored in original shipping containers) will be stored in OSHA-approved self-closing containers with flame arresters. Flammables may not be stored in open containers (open parts baths, etc.).
3. Flammable storage areas will be kept dry and well ventilated. No storage of combustible materials, open flames or exposed electrical components are permitted in the flammable storage area.
4. Flammable or combustible materials may not be stored in electrical rooms. Electrical rooms must be kept clean and dry at all times.
5. Flammable liquids sometimes may be substituted by relatively safe materials in order to reduce the risk of fires. Any substituted material should be stable and nontoxic, and should either be nonflammable or have a high flashpoint.

VIII. Storage:

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

1) Cabinets

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

such cabinets (120 gallons each) may be located in a single fire area except in an industrial area.

2) Storage Inside Buildings

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

- a. The storage of any flammable or combustible liquid shall not physically obstruct a means of egress from the building or area.
- b. Containers of flammable or combustible liquids will remain tightly sealed except when transferred, poured or applied. Remove only that portion of liquid in the storage container required to accomplish a particular job.
- c. If a flammable and combustible liquid storage building is used, it will be a one-story building devoted principally to the handling and storing of flammable or combustible liquids. The building will have 2-hour fire-rated exterior walls having no opening within 10 feet of such storage.
- d. Flammable paints, oils, and varnishes in 1 or 5 gallon containers, used for building maintenance purposes, may be stored temporarily in closed containers outside approved storage cabinets or room if kept at the job site for less than 10 calendar days.

XIX. Ventilation:

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

XX. Elimination of Ignition Sources:

1. All nonessential ignition sources must be eliminated where flammable liquids are used or stored. The following is a list of some of the more common potential ignition sources:
 - a. Open flames, such as cutting and welding torches, furnaces, matches, and heaters-these sources should be kept away from flammable liquids operations. Cutting or welding on

flammable liquids equipment should not be performed unless the equipment has been properly emptied and purged with a neutral gas such as nitrogen.

- b. Chemical sources of ignition such as d.c. motors, switched, and circuit breakers-these sources should be eliminated where flammable liquids are handled or stored. Only approved explosion-proof devices shall be used in these areas.

Mechanical sparks-these sparks can be produced as a result of friction. Only non-sparking tools should be used in areas where flammable liquids are stored or handled.

- c. Static sparks-these sparks can be generated as a result of electron transfer between two contacting surfaces. The electrons can discharge in a small volume, raising the temperature to above the ignition temperature. Every effort should be made to eliminate the possibility of static sparks. Also, proper bonding and grounding procedures must be followed when flammable liquids are transferred or transported.

XXI. Removal of Incompatibles:

- 1. Materials that can contribute to a flammable liquid fire shall not be stored with flammable liquids. Examples are oxidizers and organic peroxides, which, on decomposition, can generate large amounts of oxygen.

XXII. Flammable Gases:

- 1. Generally, flammable gases pose the same type of fire hazards as flammable liquids and their vapors. Many of the safeguards for flammable liquids also apply to flammable gases, other properties such as toxicity, reactivity, and corrosivity also must be taken into account. Also, a gas that is flammable could produce toxic combustion products.

XXIII. Fire Extinguishers:

- 1. A portable fire extinguisher is a “first aid” device and is very effective when used while the fire is small. The use of fire extinguisher that matches the class of fire, by a person who is well trained, can save both lives and property. Portable fire extinguishers must be installed in workplaces regardless of other firefighting measures. The successful performance of a fire extinguisher in a fire situation largely depends on its proper selection, inspection, maintenance, and distribution.

XXIV. Classification of Fires and Selection of Extinguishers:

Fires are classified into four general categories depending on the type of material or fuel involved. The type of fire determines the type of extinguisher that should be used to extinguish it.

- 1) Class A fires - involve materials such as wood, paper, and cloth which product glowing embers or char.
- 2) Class B fires - involve flammable gases, liquids, and greases, including gasoline and most hydrocarbon liquids which must be vaporized for combustion to occur.
- 3) Class C fires - involve fires in electrical equipment or in materials near electrically powered equipment.
- 4) Class D fires - involve combustible metals, such as magnesium, zirconium, potassium, and sodium.
- 5) Extinguishers will be selected according to the potential fire hazard, the construction and occupancy of facilities, hazard to be protected, and other factors pertinent to the situation.

XXV. Location and Marking of Extinguishers:

1. Extinguishers will be conspicuously located and readily accessible for immediate use in the event of fire. They shall be located along normal paths of travel and egress. Wall recesses and/or flush-mounted cabinets will be used as extinguisher locations whenever possible.
2. Extinguishers shall be clearly visible. In locations where visual obstruction cannot be completely avoided, directional arrows will be provided to indicate the location of extinguishers and the arrows will be marked with the extinguisher classification.
3. If extinguishers intended for different classes of fire are located together, they will be conspicuously marked to ensure that the proper class extinguisher selection is made at the time of a fire. Extinguisher classification markings will be located on the front of the shell above or below the extinguisher nameplate. Markings will be of a size and form to be legible from a distance of 3 feet.

XXVI. Condition of Fire Extinguishers-

Portable extinguishers will be maintained in a fully charged and operable condition. They will be kept in their designated locations at all times when

not being used. When extinguishers are removed for maintenance or testing, a fully charged and operable replacement unit will be provided.

XXVII. Mounting and Distribution of Extinguishers-

1. Extinguishers will be installed on hangers, brackets, in cabinets, or on shelves. Extinguishers having a gross weight not exceeding 40 pounds will be do installed that the top of the extinguisher is not more than 3-1/2 feet above the floor.
2. 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 which will distinguish it from the normal décor.
3. Extinguishers must 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 because flammable liquid fires can get out of control faster than Class A fires. 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 B hazards.

XXVII. Inspection and Maintenance of Extinguishers:

1. Once an extinguisher is selected, purchased, and installed, it is the responsibility of the Safety and Health Manager 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. Cox Energy Industrial Coatings & Cleaning LLC shall ensure portable fire extinguishers are subjected to monthly visual inspections and annual servicing/maintenance. Monthly inspections involve a visual check to ensure the pin is in place, it is adequately charged and not corroded. Visual inspections should be noted on the tag. The annual servicing and inspection is more thorough. It involves maintenance/servicing. The annual inspection is typically performed by a 3rd Party Professional, as it may involve re-charging the extinguisher and maintenance/servicing.

XXVIII. Fire Safety Inspections and Housekeeping:

1. First line Supervisors and the Safety and Health Coordinator are responsible for conducting work site surveys at least annually. 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. Also, they should determine if an emergency evacuation plan is present in work areas and that personnel are familiar with the plan.

XXIX. Emergency Egress:

1. Every exit shall 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 exits be blocked.

2. 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" or a sign indicating its actual use (i.e., "Storeroom"). Exits and accesses to exits will be marked by a readily visible sign. 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.

XXX. Occupant Emergency Plan for Persons with Disabilities:

1. The first line supervisor is assigned the responsibility to assist Persons with Disabilities under their supervision. An alternate assistant will be chosen by the supervisor. The role of the two assistants is to report to their assigned person, and to either assist in evacuation or assure that the Persons with Disabilities is removed from danger.

- a. Supervisors, alternates, and the person with a disability will be trained by the Safety and Health Manager on available escape routes and methods.
- b. A list of persons with disabilities is kept in the Office of Health and Safety. This list is updated by the Safety and Health Coordinator and the Office of Personnel Management.
- c. Visitors who have disabilities will be assisted in a manner similar to that of Company employees. The Host of the person with disabilities will assist in their evacuation.

XXXI. Emergencies Involving Fire:

1. Fire Alarms-

- a. In the event of a fire emergency, a fire alarm will sound for the building//work - site.

2. Evacuation Routes and Plans-

- a. Each facility shall have an emergency evacuation plan. All emergency exits shall conform to NFPA standards.
- b. Should evacuation be necessary, go to the nearest exit and proceed to an area of refuge outside the building or away from the work - site.

3. Emergency Coordinators-

- a. Emergency Coordinators shall be responsible for verifying personnel have evacuated from their assigned areas.

XXXII. Fire Emergency Procedures:

1. If you discover a fire:

- a. Activate the nearest fire alarm
- b. Notify the fire department by dialing 911. Give your location, the nature of the fire, and your name.
- c. Notify the Manager on duty and other occupants.
- d. Notify the Safety and Health Manager.

2. Fight the fire **ONLY** if:

- a. The fire department has been notified of the fire, **AND**
 - b. The fire is small and confined to its area of origin, **AND**
 - c. You have a way out and can fight the fire with your back to the exit, **AND**
 - d. You have the proper extinguisher, in good working order, **AND** know how to use it.
- E, If you are not sure of your ability or the fire extinguisher's capacity to contain the fire, leave the area.

3. If you hear a fire alarm:

- a. Evacuate the area. Close windows, turn off gas jets, close doors and shut down equipment as you leave.

- b. Leave the building/work area and move away from exits and out of the way of emergency operations.
- c. Assemble in a designated area.
- e. Report to the Manager/monitor so he/she can determine that all personnel have evacuated your area.
- f. Remain outside until competent authority (Physical Security, Safety and Health Manager, or your supervisor) states that it is safe to re-enter.

XXXIII. Evacuation Routes:

- a. Learn at least two escape routes, and emergency exits from your area.
- b. Never use an elevator as part of your escape route.
- c. Learn to activate a fire alarm.
- d. Learn to recognize alarm sounds.
- e. Take an active part in fire evacuation drills.

FIRE CLASSIFICATIONS

**LOOK FOR THE FOLLOWING SYMBOLS
TO TELL YOU WHAT TYPES OF FIRES AN
EXTINGUISHER IS MEANT TO PUT OUT:**

LETTER SYMBOL	PICTURE SYMBOL	DESCRIPTION
		USE ON WOOD, PAPER, TEXTILES AND RUBBISH
		USE ON FLAMMABLE LIQUIDS
		USE ON ELECTRICAL EQUIPMENT
		USE ON COMBUSTIBLE METALS
		USE ON COMBUSTIBLE COOKING MEDIA

HOW TO USE A FIRE EXTINGUISHER

P A S S



Pull the pin
in the handle



Aim the nozzle
at the base
of the fire



Squeeze the
lever slowly



Sweep from
side to side

26. FLAMMABLE LIQUIDS HANDLING STORAGE POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Flammable Liquids, Handling & Storage

I. Purpose:

1. Proper storage and use of flammable liquids can significantly reduce the possibility of accidental fires and injury to employees. To minimize risk to life and property, the requirements of NFPA 30 and 321 and OSHA Standard 1910.106 have been implemented. MSDS for flammable liquids are kept in the Safety and Health Office and at each storage location.

II. Responsibilities:

1. Management

- a. Provide proper storage for flammable liquids
- b. Ensure proper training is provided to employees who work with flammable liquids
- c. Ensure containers are properly labeled

2. Supervisors

- a. Provide adequate training in the use and storage of flammable liquids
- b. Monitor for proper use and storage
- c. Keep only the minimum amount required on hand
- d. Ensure MSDS are current for all flammable liquids

3. Employees

- a. Follow all storage and use requirements
- b. Report deficiencies in storage and use to supervisors
- c. Immediately report spills to supervisors

III. Hazard Control:

1. Engineering Controls

- a. Properly designed flammable storage areas
- b. Ventilated storage areas
- c. Grounding straps on drums and dispensing points

2. Administrative Controls

- a. Designated storage areas
- a. Limiting amount of flammable liquids in use and storage
- b. Employee training
- c. Limited and controlled access to bulk storage areas
- d. Posted danger, warning and hazard signs

IX. Definitions:

Flammable Liquid – a liquid with a flashpoint below 100 degrees F

Class 1A – flashpoint below 73 degrees F and boiling point below 100 degrees F

Class 1B – flashpoint below 73 degrees F and boiling point below 100 degrees F

Class 1C – flash at or above 73 degrees F and below 100 degrees F

Combustible Liquids – a liquid having a flash point at or above 100 degrees F

Class II Combustibles – Flashpoint above 100 degrees F and below 140 degrees F

Class III Combustibles – Flashpoint at or above 140 degrees F

Subclass IIIA – flashpoint at or above 140 degrees F and below 120 degrees F

Subclass IIIB – flashpoint at or above 200 degrees F

V. Substitution:

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

XI. Storage and Usage of Flammable Liquids:

1. Flammable and combustible liquids require careful handling at all times. The proper storage of flammable liquids within a work area is very important in order to protect personnel from fire and other safety and health hazards.
2. Storage of flammable liquids shall be in NFPA approved flammable storage lockers or in low value structures at least 50 feet from any other structure. Do not store other combustible materials near flammable storage areas or lockers.

XII. Storage Inside Buildings

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

- The storage of any flammable or combustible liquid shall not physically obstruct a means of egress from the building or area.
- Containers of flammable or combustible liquids will remain tightly sealed except when transferred, poured or applied. Remove only that portion of liquid in the storage container required to accomplish a particular job.
- If a flammable and combustible liquid storage building is used, it will be a one-story building devoted principally to the handling and storing of flammable or combustible liquids. The building will have 2-hour fire-rated exterior walls having no opening within 10 feet of such storage.
- Flammable paints, oils, and varnishes in 1 or 5 gallon containers, used for building maintenance purposes, may be stored temporarily in closed containers outside approved storage cabinets or room if kept at the job site for less than 10 calendar days.

XIII. Ventilation

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

XIX. Designated Flammable Storage Areas are:

1. _____
2. _____
3. _____

a. Maintenance and operating practices shall be in accordance with established procedure which will tend to control leakage and prevent the

accidental escape of flammable or combustible liquids. Spills shall be cleaned up promptly.

b. Combustible waste material and residues in a building or unit operating area shall be kept to a minimum, stored in covered metal receptacles and disposed of daily.

c. Rooms in which flammable or combustible liquids are stored or handled by pumps shall have exit facilities arranged to prevent occupants from being trapped in the event of fire.

d. Inside areas in which Class I liquids are stored or handled shall be heated only by means not constituting a source of ignition, such as steam, hot water or forced central systems located away from the area.

X. Cabinets

Not more than 120 gallons of Class I, Class II, and Class IIIA liquids may be stored in a storage cabinet. Of this total, not more than 60 gallons may be Class I and II liquids. Not more than three such cabinets (120 gallons each) may be located in a single fire area except in an industrial area.

XI. Containers

The capacity of flammable and combustible liquid containers will be in accordance with the table below;

Maximum allowable capacity of containers and portable tanks

Container	<u>Flammable Liquids</u>		<u>Combustible Liquids</u>		
	1A	1B	1C	11	111
Glass or approved plastic 1	1 pt	1 qt	1 gal	1 gal	1 gal
Metal (Other than DOT drums)	1 gal	5 gal	5 gal	5 gal	5 gal
Safety Cans	2 gal	5 gal	5 gal	5 gal	5 gal
Metal drum (DOT specifications)	60 gal	60 gal	60 gal	60 gal	60 gal
Approved portable tanks	660 gal	660 gal	660 gal	660 gal	660 gal
(1) Nearest metric size is also acceptable for the glass and plastic. (2) 1 gallon or metric equivalent size may be used if metal & labeled with contents.					

- Bulk drums of flammable liquids must be grounded and bonded to containers during dispensing
- Portable containers of gasoline or diesel are not to exceed 5 gallons
- Safety cans used for dispensing flammable or combustible liquids shall be kept at a point of use
- Appropriate fire extinguishers are to be mounted within 75 feet of outside areas containing flammable liquids, and within 10 feet of any inside storage area for such materials.
- Storage rooms for flammable and combustible liquids must have explosion-proof light fixtures
- Bulk storage of gasoline or diesel is kept in above ground tanks. Tank areas are diked to contain accidental spills. Tanks shall be labeled IAW NFPA guidelines. All tank areas shall be designated no smoking – no hot work – no open flame areas.

XI. No Flame Zones – No hot work or smoking is permitted in flammable or combustible liquid storage areas. The maximum amount of flammable liquids that may be stored in a building are:

1. 20 gallons of Class 1A liquids in containers
2. 100 gallons of Class 1B, 1C, 11, or 111 liquids in containers
3. 500 gallons of Class 1B, 1C, 11 or 111 liquids in a single portable tank

XII. Usage of Flammable Liquids

- Flammable liquid transfer areas are to be separated from other operations by distance or by construction having proper fire resistance.
- When not in use flammable liquids shall be kept in covered containers
- Class 1 liquids may be used only where there are no open flames or other sources of ignition within the possible path of vapor travel
- Flammable or combustible liquids shall be drawn from or transferred into vessels, containers, or portable tanks within a building only through a closed piping system, from safety cans, by means of a device drawing through the top, or from a container or portable tanks by gravity through an approved self-closing valve. Transferring by means of air pressure on the container or portable tanks shall be prohibited.

27. ELECTRICAL
SAFETY POLICY;
QUALIFIED, NON-
QUALIFIED/UNQUA
LIFIED, NFPA 70E

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Electrical Safety; Qualified, Non-Qualified/Unqualified, NFPA 70E

PURPOSE

To provide a safe working environment for Cox Energy, Industrial Coatings & Cleaning, LLC's (Company) employees who work with or around electrical equipment. Note: NFPA 70E is a standard published by the National Fire Protection Association and is the consensus standard that OSHA uses to develop its regulatory standards.

I. NOTICE TO HOST EMPLOYER

The Company ("contract employer") shall advise the host employer of the following:

1. Any unique hazards presented by the contract employer's work;
2. Hazards identified during the course of work by the contractor employer that were not communicated by the host employer;
3. The measures the contractor took to correct any hazards reported by the host employer to prevent such hazards from recurring in the future.

II. NON-QUALIFIED/UNQUALIFIED ELECTRICAL WORKER

1. All company employees shall be **deemed non-qualified/unqualified** electrical workers.
2. Unqualified persons shall not be permitted to enter spaces that are required to only be accessible to qualified employees unless the electric conductors and equipment involved are in an electrically safe work condition.

III. TRAINING

1. Employees shall be trained in and familiar with the safety-related work practices required by the OSHA Standards CFR 1910.331 through 1910.335. One or more competent persons shall be designated (as defined in 1926.32(f)) to implement the program.

2. Additional requirements for unqualified persons. These persons shall also be trained in and familiar with any electrically related safety practices not specifically addressed by CFR 1910. 331 through 1910.335 but which are necessary for their safety. This training may be required to be done by the host facility when there are specific electrical hazards to that facility that an unqualified person may not be familiar with.
3. The training required under this section shall be of the classroom variety or on-the-job type. The degree of training provided shall be determined by the risk to the employee.
4. The employees shall be trained in safety-related work practices for working within Limited Approach Boundary. In addition, employees shall be trained in elements including, but not limited to, evaluations, anticipating unexpected events, all electrical parts are considered live until proven otherwise, work permits, electrical flash arc hazard analysis, and as enumerated in Table A.
5. The Company shall perform a risk assessment prior to work being performed within the Limited Approach Boundary. Risk Assessment shall contain event severity, frequency, probability and avoidance to determine the level of safe practices employed. The Risk Assessment must be completed by the employee before work is started and account for hazards at the limited approach and arc flash boundaries. The Risk Assessment Procedure must identify the hazards, assess risks, and implement risk control in accordance with a hierarchy of control. This hierarchy places elimination of a hazard as the primary method of control and identifies PPE as the last option if all other options have been exhausted.
6. An Arc Flash risk assessment must be completed. The Arc flash risk assessments shall include determining appropriate safety related work practices, the arc flash boundary requirements, and the PPE required to minimize the risk of electric shock. Assessments must be documented and equipment field marked with a label. These assessments must be reviewed at least every five years if the incident energy analysis method is used in the assessment.
7. For qualified persons who are allowed to work within the Limited Approach Boundary, employees shall be trained in the skills and techniques to: distinguish exposed energized electrical conductors and circuit parts from other parts of electrical equipment, to determine the nominal voltage of

exposed energized electrical conductors and circuit parts, the approach distances specified in Tables 130.4(D)(a) and 130.4(D)(b), and the decision making process necessary to determine the degree and extent of the hazard and the personal protective equipment and job planning necessary to perform the task safely.

8. Employees shall be trained to understand the specific hazards associated with electrical energy and in safety-related work practices and procedural requirements as necessary to provide protection from the electrical hazards associated with their respective jobs. Employees shall be trained to identify and understand the relationship between electrical hazards and possible injury.

9. Retraining. An employee shall receive additional training (or retraining) under any of the following conditions:

- a. If the supervision or annual inspections indicate that the employee is not complying with the safety-related work practices;
- b. If new technology, new types of equipment, or changes in procedures necessitate the use of safety-related work practices that are different from those that the employee would normally use; or
- c. If he or she must employ safety-related work practices that are not normally used during his or her regular job duties.

IV. SELECTION AND USE OF WORK PRACTICES:

1. A job briefing shall be held before starting each job and include all employees involved. The briefing shall cover hazards associated with the job, work procedures involved, special precautions, energy source controls, PPE requirements, and the information on the energized electrical work permit, if required. Additional job briefings shall be held if changes that might affect the safety of employees occur during the course of work.

2. Safety-related work practices shall be employed to prevent electrical shock or other injuries resulting from either direct or indirect electrical contacts when company employees are performing work near on or in close proximity to equipment or circuits which are or may be come energized. These safety related work practices include, but are not limited to: PPE, shields, barriers and barricades, insulating blankets and sleeves, approach distance warnings, insulated tools, lockout/tagout procedures, and nonconductive equipment (ladders, etc.). Conductive apparel or articles such as jewelry may not be worn if they might contact exposed energized conductors. However, such clothing or

other metallic articles may be worn if they are rendered nonconductive by covering, wrapping, or other insulating means.

3. Live parts to which an employee may be exposed shall be deenergized before the employee works on or near them, unless the facility host can demonstrate that deenergizing the equipment introduces additional or increased hazards or is infeasible due to equipment design or operational limitations. When working on or near exposed deenergized parts, which are not locked or tagged out of service and grounded, these conductors shall be treated as if they are energized or “HOT”.

4. If the exposed live circuits or equipment are not deenergized, such work practices as listed above shall be used to protect the unqualified person from coming into contact, with any part of the body, either directly or indirectly, with the conductive object. The work practices chosen shall be suitable for the conditions under which the work is to be performed and the voltage levels present.

5. Only qualified persons shall perform tasks such as testing, troubleshooting, and voltage measuring on electrical equipment operating at voltages equal to or greater than 50 volts. When test instruments are used for the testing for the absence of voltage on conductors or circuit parts operating at 50 volts or more, the operation of the test instrument shall be verified before and after an absence of voltage test is performed.

6. Any equipment that is damaged cannot be permitted to be used. Damaged items shall be tagged “DO NOT USE” and removed from the job - site and not be used until repaired. Repairs shall only be made by authorized personnel.

7. When any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both lockout/tagout procedures are used. If LO/TO procedures are used, the facility host shall ensure that personnel are given training in that procedure by the facility host and that all personnel of Cox Energy, Industrial Coatings & Cleaning LLC working in the facility know how the procedure protects them from any inadvertent energy release. Cox Energy, Industrial Coatings & Cleaning LLC personnel are not allowed to operate any equipment that has a host facility’s lockout or tagout device attached to it. However, Cox Energy, Industrial Coatings & Cleaning LLC personnel are allowed to attach their lockout/tagout device to the equipment that is “cleared” by the host facility’s lockout/tagout procedure.

8. When unqualified persons are working in an elevated position near energized overhead electrical lines, the location shall be such that the personnel and the longest conductive object they may be using, which may contact the energized conductor, shall not come any closer than the following distances:

- For voltages to ground 50 kV or below – 10 ft. (305 cm)
- For voltages to ground 50 kV or above – 10 ft (305 cm) plus 4 inches (305 cm) for every 10 kV over 50 kV.

9. When unqualified personnel are working on the ground in the vicinity of energized overhead lines, the personnel shall not bring any conductive object closer to the unguarded energized conductors than the distances given in (f) above. All employees shall observe the approach distances given in the following table:

TABLE A
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).

These approach distances also apply if the conductor is deenergized and not locked or tagged out of service and grounded.

10. Any vehicle or mechanical equipment (fork truck, scissors lift, aerial lift, etc.) that is capable of having parts of its structure elevated near energized conductors shall be operated in accordance with the approach distances specified in section (e) above. The facility host shall identify and inform Cox Energy, Industrial Coatings & Cleaning LLC personnel of the nominal voltage rating of any overhead energized conductors in close proximity to the work involved. Cox Energy, Industrial Coatings & Cleaning LLC personnel shall not enter spaces (confined or enclosed) containing energized conductors unless adequate illumination is provided that enables the employees to perform the work safely.

11. Where lack of adequate illumination or an obstruction precludes

observation of the work to be performed, employees may not perform tasks near exposed energized conductors. Employees shall not reach blindly into areas which may contain energized conductors.

12. Conductive apparel or articles such as jewelry may not be worn if they might contact exposed energized conductors. However, such clothing or other metallic articles may be worn if they are rendered nonconductive by covering, wrapping, or other insulating means.

13. Only qualified personnel are allowed to work on energized conductors. Cox Energy, Industrial Coatings & Cleaning LLC personnel are deemed unqualified therefore **they are not permitted to work on any energized conductor under any circumstances.**

14. An Energized Electrical Work Permit must be completed before starting work. Work on energized electrical conductors or circuit parts that cannot be placed in an electrically safe work condition shall be performed by written permit only BEFORE WORK STARTS. Work performed on electrical conductors and circuit parts operating at less than 50 volts shall not be required to be de-energized if it is determined that there will be no increased exposure to electrical burns or explosion.

15. The company shall implement Alerting Techniques to inform employees of potential hazards. Alerting techniques shall include safety signs and tags, barricades, and attendants. Safety signs must meet the requirements of applicable state, federal, or local codes and standards. Barricades must be used in conjunction with safety signs and never by themselves. Any technique used must not increase the potential for employee injury.

V. USE OF EQUIPMENT

1. All electrical equipment, extension cord, or power tool with an attached flexible cord shall always be used in conjunction with a GFCI when used on all 120-volt, single phase 15 and 20-ampere temporary wiring on construction sites. Power tools shall be double insulated.

2. Protective shields, protective barriers, or insulating materials shall be provided when and where they are required due to work process or environment for the protection of employees from contact with energized conductors. This includes work within confined or enclosed spaces.

3. All portable ladders used in work with the potential for contact with energized conductors shall have non-conductive side rails.

VI. SAFEGUARDS FOR PERSONAL PROTECTION

1. Employees working in an area where there are potential electrical hazards shall be provided with and shall use appropriate PPE.
2. PPE shall be maintained in a safe, clean, sanitary, reliable condition.
3. Employees shall wear appropriate PPE (arc calorie rating required by NFPA 70E) when exposed to the danger of electric arc flash or from flying objects as a result of an electrical explosion.
4. All insulating tools, PPE, and other equipment must be inspected before each day's use and immediately following any incident that can reasonably be suspected of having caused damage. Insulating gloves shall be given an air test along with the inspection.

VII. FIELD WORK AUDITS

The Company shall perform an audit of field work on an annual basis. The audit must be performed every year to ensure the requirements in the written program are being performed by the employees. The written program must be updated if auditing determines that employees are not following it or if another issue is identified with potential hazardous exposure.

28. LADDER SAFETY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Ladder Safety Policy

I. Requirements:

1. All ladders shall be inspected before use by a competent person for physical defects. All ladders must meet the following OSHA/ANSI requirements. Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use. Rungs, cleats, and steps of portable ladders (except as provided below) and fixed ladders (including individual-rung/step ladders) shall be spaced not less than 10 inches (25 cm) apart, nor more than 14 inches (36 cm) apart, as measured between center lines of the rungs, cleats, and steps. Rungs, cleats, and steps of step stools shall be not less than 8 inches (20 cm) apart, nor more than 12 inches (31 cm) apart, as measured between center lines of the rungs, cleats, and steps. Rungs, cleats, and steps of the base section of extension trestle ladders shall not be less than 8 inches (20 cm) nor more than 18 inches (46 cm) apart, as measured between center lines of the rungs, cleats, and steps. The rung spacing on the extension section of the extension trestle ladder shall be not less than 6 inches (15 cm) nor more than 12 inches (31 cm), as measured between center lines of the rungs, cleats, and steps. The minimum clear distance between the sides of individual-rung/step ladders and the minimum clear distance between the side rails of other fixed ladders shall be 16 inches (41 cm). The minimum clear distance between side rails for all portable ladders shall be 11 1/2 inches (29 cm). The rungs of individual-rung/step ladders shall be shaped such that employees' feet cannot slide off the end of the rungs. The rungs and steps of portable metal ladders shall be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.
2. Ladders shall not to be painted except for numbering purposes.
3. Do not use ladders for skids, braces, workbenches, or any purpose other than climbing. Ladders shall be used only for the purpose for which they were designed. Never use ladder in a horizontal position or as scaffolding, do not place ladders on top of boxes, barrels, crates, etc.
4. When you are ascending or descending a ladder, do not carry objects that will prevent you from grasping the ladder with both hands.

5. Always face the ladder when ascending and descending. Three-point contact with the ladder shall always be maintained while ascending and descending.
6. The employee must always keep his/her shoulders and waist between the ladders side rails.

II. – Ladder Use:

1. Do not place tools or materials on the steps or platform of a stepladder
2. Do not use the top two steps of a stepladder as a step or stand.
3. Always level all four feet and lock spreaders in place. Do not use a stepladder as a straight ladder.
4. All straight or extension ladders must extend at least three feet beyond the supporting object when used as an access to an elevated work area.
5. After raising the extension portion of a two-stage ladder to the desired height, check to ensure that the safety dogs or latches are engaged.
6. Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.
7. All extension or straight ladders must be secured or tied off at the top.
8. Keep the area around the top and bottom of a ladder clear.
9. Keep ladders free from slipping hazards.
10. Do not tie ladders together to make longer sections, unless designed for such use.

29. FALL PROTECTION POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Fall Protection Plan:

Policy:

It is the policy of Cox Energy, Industrial Coatings & Cleaning LLC. to take all practical measures possible to prevent employees from being injured by fall from heights. The Company will take all necessary steps to eliminate, prevent, and control fall hazards. The Company shall comply fully with the OSHA Fall Protection Standard CFR 1926.500

First consideration will be given to the elimination of fall hazards. If a fall hazard cannot be eliminated, effective fall protection will be planned, implemented, and monitored to control the risks of injury due to falling. The Construction Industry Standard 1926.501(b)(1) shall be followed - Unprotected sides and edges. Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

All personnel exposed to potential falls from heights will be trained to minimize their exposures. Re-training shall be provided when there are deficiencies in training, when work practices are changed or when fall protection equipment is modified. Fall protection equipment will be provided and used by all employees. Supervisors shall be responsible for implementation of a fall protection plan for each job site.

I. Fall Hazard Identification and Evaluation Responsibilities:

The Supervisor on each job site shall be responsible for identifying fall hazards on their job site. The Supervisor shall evaluate each situation or work procedure where employees may be exposed to a fall of 6 feet or more. The Supervisor, with the assistance of the Safety & Health Supervisor, shall be responsible for developing a plan to eliminate the exposures, if possible, or to select the appropriate fall protection systems and/or equipment.

II. Examples of Situations Requiring Fall Protection:

The following are examples of situations where fall protection will be required. This listing is by no means complete, and there are many other situations where a fall of 6 feet or more is possible. It should be noted that ladders and scaffolding are not included in this list. They are covered by other OSHA standards and other requirements of our safety program.

- Wall Openings

Any employee working near a wall opening (including those with chutes attached) where the outside bottom edge of the wall opening is 6 feet or more from a lower level, or the wall opening is less than 39 inches (1.0 meter) above the walking/working surface below, will be protected from falling by the use of a guardrail system, a safety net system, or a personal fall arrest system.

- Holes

Personal fall arrest systems, covers, or guardrail systems shall be erected around holes (including skylights) that are more than 6 feet above lower levels.

- Excavations

Each Employee at the edge of an excavation 6 feet or more deep shall be protected from falling by guardrail systems, fences, barricades, or covers. Where walkways are provided to permit employees to cross over excavations, guardrails are required on the walkway if it is 6 feet or more above the excavation.

- Hoist Areas

Each employee in a hoist area shall be protected from falling 6 feet or more by guardrail systems or personal fall arrest systems. If guardrail systems (chain gate or guardrail) or portions thereof must be removed to facilitate hoisting operations, as during the landing of materials, and a worker must lean through the access opening or out over the edge of the access opening to receive or guide equipment and materials, that employee must be protected by a personal fall arrest system.

- Ramps, Runways, and Other Walkways

Each employee using ramps, runways, and other walkways shall be protected from falling 6 feet or more by guardrail systems.

III. Fall Protection Systems:

When there is a potential fall of 6 feet or more, the Company will utilize one or more of the following means of providing protection:

- **Guardrail Systems**

Guardrail systems must meet the following criteria. Toprails and midrails of guardrail systems must be at least one-quarter inch nominal diameter or thickness to prevent cuts and lacerations. If wire rope is used to toprails, it must be flagged at not more than 6 foot intervals with a high-visibility material. Steel and plastic banding will not be used as toprails or midrails. Manila, plastic, or synthetic rope used for toprails or midrails must be inspected as frequently as necessary to ensure strength and stability.

The top edge height of toprails, or (equivalent) guardrails must be 42 inches plus or minus 3 inches, above the walking/working level. When workers are using stilts, the top edge height of the top rail, or equivalent member, must be increased an amount equal to the height of the stilts.

Screens, midrails, mesh, intermediate vertical members, or equivalent intermediate structural members must be installed between the top edge of the guardrail system and the walking/working surface when there are no walls or parapet walls at least 21 inches high. When midrails are used, they must be installed at a height midway between the top edge of the guardrail system and the walking/working level. When screens and mesh are used, they must extend from the top rail to the walking/working level and along the entire opening between top rail supports. Intermediate members, such as balusters, when used between posts, shall not be more than 19 inches apart.

Other Structural members, such as additional midrails and architectural panels, shall be installed so that there are no openings in the guardrail system more than 19 inches.

The guardrail system must be capable of withstanding a force of at least 200 pounds applied within 2 inches of the top edge in any outward or downward direction. When the 200-pound test is applied in a downward direction, the

top edge of the guardrail must not deflect to a height less than 39 inches above the walking/working level.

Midrails, screens, mesh, intermediate vertical members, solid panels, and equivalent structural members shall be capable of withstanding a force of at least 150 pounds applied in any downward or outward direction at any point along the midrail or other member.

Guardrail systems shall be surfaced to protect workers from punctures or lacerations and to prevent clothing from snagging.

The ends of top rails and midrails must not overhang terminal posts, except where such overhang does not constitute a projection hazard.

When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section must be placed across the access opening between guardrail sections when hoisting operations are not taking place.

At holes, guardrail systems must be set up on all unprotected sides or edges. When holes are used for the passage of materials, the hole shall have not more than two sides with removable guardrail sections. When the hole is not in use, it must be covered or provided with guardrails along all unprotected sides or edges.

If guardrail systems are used around holes that are used as access points (such as ladderways), gates must be used or the point of access must be offset to prevent accidental walking into the hole.

If guardrails are used at unprotected sides or edges of ramps and runways, they must be erected on each unprotected side or edge.

IV. Personal Fall Arrest Systems:

These consist of an anchorage, connectors, and a body belt or body harness and may include a deceleration device, lifeline, or suitable combinations. If a personal fall arrest system is used for fall protection, it must do the following:

- Limit maximum arresting force on an employee to 900 pounds when used with a body belt
- Limit maximum arresting force on an employee to 1,800 pounds when used with a body harness

- Be rigged so that an employee can neither free fall more than 6 feet nor contact any lower level
- Bring an employee to a complete stop and **limit maximum deceleration distance an employee travels to 3.5 feet**
- Have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet or the free fall distance permitted by the system, whichever is less

The use of body belts for fall arrest is prohibited and a full body harness is to be required.

Personal fall arrest systems shall be inspected by a competent person prior to each use for wear damage, and other deterioration. Defective components must be removed from service.

V. Safety Net Systems:

Safety nets must be installed as close as practicable under the walking/working surface on which employees are working and never more than 30 feet (9.1 meters) below such levels. Defective nets shall not be used. Safety nets shall be inspected at least once a week for wear, damage, and other deterioration. Safety nets shall be installed with sufficient clearance underneath to prevent contact with the surface or structure below.

Items that have fallen into safety nets including – but not restricted to, materials, scrap equipment, and tools – must be removed as soon as possible and at least before the next work shift.

- Shall be attached to each stanchion in such a way that pulling on one section of the line between stanchions will not result in slack being taken up in the adjacent section before the stanchion tips over.
- Warning lines shall be erected around all sides of roof work areas. When mechanical equipment is being used, the warning line shall be erected not less than 6 feet from the roof edge parallel to the direction of mechanical equipment operation, and not less than 10 feet from the roof edge perpendicular to the direction of mechanical equipment operation.
- When mechanical equipment is not being used, the warning line must be erected not less than 6 feet from the roof edge.

VI. Covers:

Covers located in roadways and vehicular aisles must be able to support at least twice the maximum axle load of the largest vehicle to which the cover might be subjected. All other covers must be able to support at least twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time. To prevent accidental displacement resulting from wind, equipment, or workers' activities, all covers must be secured. All covers shall be color coded or bear the marking "HOLE" or "COVER."

VII. Protection From Falling Objects:

When guardrail systems are used to prevent materials from falling from one level to another, any openings must be small enough to prevent passage of potential falling objects. No materials or equipment except masonry and mortar shall be stored within 4 feet of working edges. Excess mortar, broken or scattered masonry units, and all other materials and debris shall be kept clear of the working area by removal at regular intervals.

During roofing work, materials and equipment shall not be stored within 6 feet of a roof edge unless guardrails are erected at the edge, and materials piled, grouped, or stacked near a roof edge must be stable and self-supporting.

VIII. Training:

Training shall be provided for each employee who might be exposed to fall hazards. Training must enable each employee to recognize the hazards of falling and the procedures to follow to minimize these hazards. Re-training shall be provided when there are deficiencies in training, when work practices are changed or when fall protection equipment is modified. Records showing participants, training dates and signatures of instructors must be maintained.

Employees shall be trained on the following:

- (a) The nature of fall hazards in the work area;
- (b) The correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems;
- (c) The use and operation of controlled access zones and guardrail, personal fall arrest, safety net, warning line, and safety monitoring systems;

- (d) The role of each employee in the safety monitoring system when the system is in use;
- (e) The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs;
- (f) The correct procedures for equipment and materials handling and storage and the erection of overhead protection; and,
- (g) The Employees' role in the fall protection plans.

IX. Rescue Procedure:

1. Equipment and services for prompt rescue of fallen workers shall be available before elevated work begins. Employees shall be trained in rescue techniques. Local fire departments may not have the means to perform safe and efficient rescue, so do not assume they are able to do so.
2. All Incidents involving falls shall be investigated. The investigation will look at the fall protection plan to see if any updates are needed to keep the incident from happening again.

30. FIRST AID POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

First - Aid Policy:

I. Statement of Policy:

First Aid is the provision of limited care for an illness or injury which is provided to a sick or injured patient until definitive medical treatment can be accessed, or until the illness or injury is fully dealt with. It generally consists of a series of simple, sometimes life-saving medical techniques that an individual can be trained to perform with minimal equipment. The principle of first aid is immediate action, but it is essential that quick action does not cause panic. Cox Energy, Industrial Coatings & Cleaning LLC shall provide personnel and equipment as outlined herein:

II. Requirements:

1. In the absence of available medical assistance that is reasonably accessible, (infirmary, clinic, or hospital) in near proximity to the workplace in terms of time and distance to the work-site, a person or persons who have a valid certification from the US Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence, in CPR/First Aid, that can be documented, shall be available and adequately trained to render first aid. This certification shall be obtained from the American Red Cross, U.S. Bureau of Mines, or equivalent verifiable training.
2. Adequate first aid supplies as described in ANSI Z308. 1-1998 shall be available and easily accessible when required. Site Managers, with the assistance of the Safety Manager, shall assess the specific needs of larger work sites and provide first aid supplies that could reasonably be anticipated to be required. Personnel shall be trained as to the locations of these first-aid kits and they shall be maintained in an accessible unobstructed manner.
3. First aid kits shall be inspected periodically and reassessed as to the demand for supplies and their inventories adjusted accordingly by a competent person and **sealed**. If the seal is broken the first aid kit shall be inspected and any missing items or supplies shall be replaced. For construction operations, first aid kits shall be checked before being sent out to each job and at least weekly thereafter.

III. Emergency Response

1. Where the eyes or body of any employee may be exposed to injurious corrosive materials, suitable facilities for quick drenching and flushing of the eyes, and eye washing and flushing of the body shall be provided within the work area for immediate emergency use.
2. Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service shall be provided.

31. WORK PLANNING/ PRECONSTRUCTION POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Work Planning / Pre-Construction:

1. Safety Plans & Required Submissions

- a. All Project Supervisors performing work on Cox Energy, Industrial Coatings, & Cleaning projects are responsible to have a written project-specific health and safety program. A copy of this program prior to starting any work on site will be required as well as the name of the on-site safety supervisor. Cox Energy, Industrial Coatings, & Cleaning Management shall review this program prior to work starting. A review of the program shall take place with the superintendent and Cox Energy, Industrial Coatings, & Cleaning competent persons involved in each work activity prior to work starting. The plan shall be submitted to Cox Energy, Industrial Coatings, & Cleaning electronically, within a minimum of 10 working days prior to starting work on the project.

The following elements shall be included in the project specific safety program plan:

- Introductory project information
- Statement of safety and health policy
- Jobsite inspections
- Responsibilities and lines of authority
- Accident reporting
- Employee Training
- Specific plans required based on scope of work, risk assessment, and applicable regulations may include, but are not limited to:
 - Fall protection & rescue
 - Fire prevention
 - Electrical safety & lockout-tagout
 - PPE
 - Welding, cutting
 - Scaffolding
 - Excavation
 - Pre-task planning

- Hazard communication
- Steel erection plan
- Confined space entry
- Emergency action
- Crystalline silica
- Heat stress
- Sanitation

Job Hazard Analysis and Job Safety Analysis (JHA / JSA)

- a. Job hazard analysis (JHA) and pre-task plans (JSA) are risk management tools to help identify hazards or risks and formulate controls to reduce the hazard to an acceptable risk level. This provides a proactive approach to safety and risk management versus the less reliable reactive approach where often the hazard presents itself in a way that causes harm. The JHA/JSA methods promote conscious decisions based on risk assessment. Work can be planned out in one's head, but it is extremely difficult to follow a methodical process. Documenting the plan on paper (or computer/tablet) allows the "brainstorming" process to work more efficiently and completely.
- b. JHA & JSA are parallel processes for assuring a safe workplace and will be planned out, ahead of time, for each phase or scope of work, before that work phase begins. Work is not authorized without a JSA that identifies and addresses all hazards for the work activity.
- c. Risk management processes (JHA & JSA) should be applied in the following order:

1. Identify Hazards 2. Assess Hazards 3. Make Risk Decisions	4. Implement Controls 5. Supervise
- d. JHA and JSA hazard controls shall be applied using a Hierarchy of Controls methodology. This is used as a means of determining how to implement feasible and effective control solutions, in the order of preference (see page 161).
- e. The Work Planning/Pre-Construction group shall develop a JHA that identifies the hazards before commencing each major phase or activity at

the project. The JHA will also describe the planned work and assign responsibility for hazard prevention and control of identified hazards, and state corrective actions to prevent injury.

- f. The JHA shall be developed by the project team that includes, at a minimum, the Cox Energy, Industrial Coatings, & Cleaning project management team and the, superintendents, foreman, and safety personnel. JHA's will serve as a reference document for the creation of the JSA.

Change Management

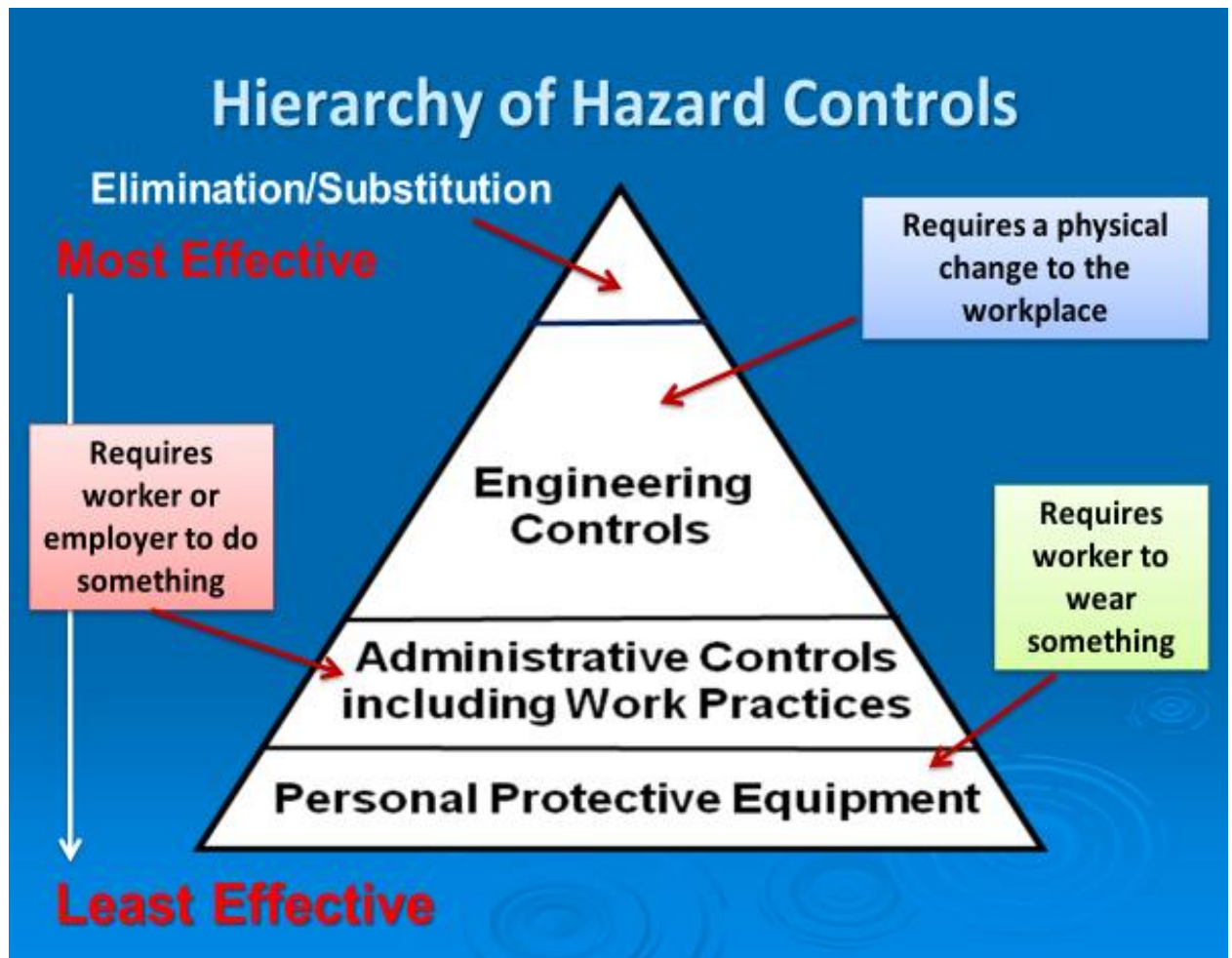
- a. Changes in a plan present the most challenging part of the pre-task planning process and ensuring safety in an ever-changing construction environment. Changes to the plan, if not properly managed, addressed, and communicated can create extremely hazardous situations. Changes which must be documented on the JSA throughout the shift include:
 - Job tasks/steps that are added or changed
 - Conditions that change during the day
 - Hazards that change based on step/task changes or that were previously identified
 - Work areas change
 - Crew members are added or removed

Changes shall be initiated with a Stop - Think - Act process and be communicated to the supervisor. If greater hazards are identified or if anyone is unsure about the plan escalate through the chain of command to the superintendent, sub-contractor safety, and Cox Energy, Industrial Coatings, & Cleaning

- a. Changes in a plan present the most challenging part of the pre-task planning process and ensuring safety in an ever-changing construction environment. Changes to the plan, if not properly managed, addressed, and communicated can create extremely hazardous situations. Changes which must be documented on the JSA throughout the shift include:
 - Job tasks/steps that are added or changed
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- Hazards that change based on step/task changes or that were previously identified
- Work areas change
- Crew members are added or removed

b. Changes shall be initiated with a Stop - Think - Act process and be communicated to the supervisor. If greater hazards are identified or if anyone is unsure about the plan, escalate through the chain of command to the superintendent of and Cox Energy, Industrial Coatings, & Cleaning. Once safety and compliance are simultaneously assured and all employees are comfortable with the plan, work can proceed.



JHA and JSA Recordkeeping

- a. A JHA shall be part of the Work Planning/Pre-Construction process before start of work at the project. As additional scopes of work or contracts are added, required s copies of the JHA's shall be submitted electronically prior to commencement of work.
- b. JSA's shall be completed daily and maintained in the work area for the duration of the shift, with copies submitted to the Cox Energy, Industrial Coatings, & Cleaning Safety Department on a weekly basis.
Once safety and compliance are simultaneously assured and all employees are comfortable with the plan, work can proceed.

A JHA shall be part of the Work Planning/Pre-Construction submittal process before start of work at the project. As additional scopes of work or contracts are added, copies of the JHA's shall be submitted electronically prior to commencement of work. JSA's shall be completed daily and maintained in the work area for the duration of the shift, with copies submitted to the Cox Energy, Industrial Coatings, & Cleaning Safety Department on a weekly basis.

XV. Safety Meetings

All meetings (progress/schedule, coordination, foreman/superintendent, etc.) shall start with safety talks and/or activities as number one on the agenda. The project will additionally conduct a site shutdown safety meeting with all trades on a weekly basis. Items of discussion include:

- General safety topics
- Incident prevention
- Safety attitude & culture
- Anticipated/potential problems
- Program and procedure updates
- Injury/incident, near miss reports

XVI. Toolbox Talks

All supervisory personnel/safety representatives are responsible for conducting weekly toolbox talks with their employees to discuss safety concerns and hazards. Formal and informal topics should be discussed and recorded, with consideration given to the relevancy of the topic based on current work activities. These talks are a contractual obligation, and they must be documented and signed by all crew members. Toolbox

talks are for continuous education and recurring training, toolbox talks may not be utilized to fulfill OSHA or 70E initial training requirements. Copies of toolbox talks are to be submitted to the Company Safety Department weekly at a minimum.

Job Briefing

- a. The JSA and/or JHA shall be reviewed orally with the crew performing the task and each employee shall review & sign off on the plan indicating their agreement. This signature shall constitute the employee's agreement to follow the safe work practices determined by the crew, and their individual safety responsibilities. These responsibilities identified in the job briefing and on the JSA and/or JHA are important to ensure accountability for safety.

32. TRENCHING/ SHORING/ EXCAVATION POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Trenching/Shoring/Excavation Policy:

Policy –

1. This Excavation Safety Program has been developed to protect employees from safety hazards that may be encountered during work in trenches and excavations. This program is intended to assure that:

- a. Employees who perform work in excavations are aware of their responsibilities and know how to perform the work safely.
- b. The Company shall designate a competent person on each job site to assure compliance with the requirements of this program.
- c. The responsibilities of the competent person(s) and workers are clearly detailed.
- d. All persons involved in excavation and trenching work have received appropriate training in the safe work practices that must be followed when performing this type of work.

II Training –

- 1. All personnel involved in trenching or excavation work shall be trained in the requirements of this program by a competent person with assistance from the appropriate supervisors.
- 2. Training shall be performed prior to employees being assigned duties in trenching/shoring/excavations.
- 3. Retraining will be performed when work site inspections indicate that an employee does not have the necessary knowledge or skills to safely work in or around excavations, or when changes to this program are made.
- 4. Training records shall be maintained by, and shall include:
 - a. date of the training program;
 - b. name(s) of the instructor(s) who conducted the training;
 - c. a copy of the written material presented; and

d. name(s) of the employee(s) who received the training

III Work Practices –

1. The use of personal protective equipment that will typically be required during work in excavations, including but not limited to safety shoes, hardhats, safety glasses, gloves, and fall protection devices.
2. The designated competent person shall ensure on a daily basis, or more often as detailed in this program, that worksite conditions are safe for employees to work in excavations.
3. Prior to excavation, the site shall be thoroughly inspected by the designated competent person to determine if special safety measures must be taken.
4. Stairs, ladders, or ramps shall be provided at excavation sites where employees are required to enter trench excavations over four (4) feet deep. The maximum distance of lateral travel (along the length of the trench) necessary to reach the means of egress shall not exceed 25 feet.
5. When portable ladders are used, the ladder side rails shall extend a minimum of three (3) feet above the upper surface of the excavation.
6. Ladders shall have nonconductive side rails if work will be performed near exposed energized equipment or systems.
7. Ladders will be inspected prior to use for signs of damage or defects. Damaged ladders will be removed from service and marked with “Do Not Use” until repaired.
8. Ladders shall be used only on stable and level surfaces unless secured. Ladders placed in any location where they can be displaced by workplace activities or traffic shall be secured, or barricades shall be used to keep these activities away from the ladders.
9. Employees are not permitted to carry any object or load while on a ladder that could cause them to lose their balance and fall.
10. Employees entering bell-bottom pier holes or other similar deep and confined footing excavations shall wear a harness with a lifeline securely attached to it. The lifeline shall be separate from any line used to handle materials and shall be

individually attended at all times while the employee wearing the lifeline is in the excavation.

11. Each employee working at the edge of an excavation six (6) feet or more deep shall be protected from falling. Fall protection shall include guardrail systems, fences, barricades, covers, or a tie-back system meeting OSHA requirements, as determined by the designated competent person .

12. Walkways shall be provided where employees or equipment are permitted to cross over excavations. Guardrails shall be provided where walkways, accessible only to authorized project personnel, are six (6) feet or more above lower levels.

13. Employees are not permitted to work in excavations that contain or are accumulating water unless precautions have been taken to protect them from the hazards posed by water accumulation. Precautions may include special support or shield systems to protect from cave-ins, water removal to control the level of accumulating water, or use of safety harnesses and lifelines.

14. The location of underground installations shall be determined before excavation. When utility companies or clients cannot respond to a request to locate underground utility installations within 24 hours, or cannot establish exact location of these installations, the employer may proceed, provided the employer does so with caution and provided detection equipment or other acceptable means to locate utility installations are used.

15. Soil classifications must be determined by testing and protective systems designed according to soil classifications.

IV Exposure to Vehicular Traffic

1. Employees exposed to vehicular traffic shall be provided with, and shall wear warning vests or other suitable garments marked with or made of reflectorized or high-visibility material. Warning vests worn by flagmen shall be red or orange, and shall be reflectorized material if worn during night work. Emergency lighting, such as spotlights or portable lights, shall be provided as needed to perform work safely.

V Exposure to Falling Loads

1. No employee is permitted underneath loads being handled by lifting or digging equipment. Employees are required to stand away from any vehicle being loaded or unloaded to avoid being struck by any spillage or falling materials. Operators may remain in the cabs of vehicles being loaded or unloaded when the vehicles provide adequate protection for the operator during loading and unloading operations.

VI Warning System for Mobile Equipment

1. A warning system shall be used when mobile equipment is operated adjacent to the edge of an excavation if the operator does not have a clear and direct view of the edge of the excavation. The warning system shall consist of barricades, hand or mechanical signals, or stop logs. If possible, the grade should be away from the excavation.

VII Hazardous Atmospheres

1. The designated competent person shall test the atmosphere in excavations over four (4) feet deep if a hazardous atmosphere exists or could reasonably be expected to exist. A hazardous atmosphere could be expected, for example, in excavations in landfill areas, areas where hazardous substances are stored nearby, or near areas containing gas pipelines.

2. Atmospheric testing will be performed using a properly calibrated direct reading gas monitor. Direct reading gas detector tubes or other acceptable means may also be used to test potentially toxic atmospheres.

3. Each atmospheric testing instrument shall be calibrated by a competent person on a schedule and in the manner recommended by the manufacturer

VIII Stability of Adjacent Structures

1. The designated competent person shall determine if the excavation work could affect the stability of adjoining buildings, walls, sidewalks, or other structures.

2. Support systems (such as shoring, bracing, or underpinning) shall be used to assure the stability of structures and the protection of employees where excavation operations could affect the stability of adjoining buildings, walls, or other structures.

3. Excavation below the level of the base or footing of any foundation or retaining wall that could be reasonably expected to pose a hazard to employees shall not be permitted, except when:

- a. a support system, such as underpinning, is provided to ensure the safety of employees and the stability of the structure;
- b. the excavation is in stable rock;
- c. a registered professional engineer has approved the determination that the structure is sufficiently removed from the excavation so as to be unaffected by the excavation activity; or
- d. a registered professional engineer has approved the determination that such excavation work will not pose a hazard to employees.

4. Sidewalks, pavements, and appurtenant structures shall not be undermined unless a support system or other method of protection is provided to protect employees from the possible collapse of such structures.

5. Where review or approval of a support system by a registered professional engineer is required, the designated competent person shall secure this review and approval in writing before the work begins.

IX Protection from Falling Objects and Loose Rocks or Soil

1. Adequate protection shall be provided to protect employees from loose rock or soil that could pose a hazard by falling or rolling from an excavation face. Such protection shall consist of:

- a. scaling to remove loose material;
- b. installation of protective barricades, such as wire mesh or timber, at appropriate intervals on the face of the slope to stop and contain falling material; or
- c. benching sufficient to contain falling material.

2. Excavation personnel shall not be permitted to work above one another where the danger of falling rock or earth exists.

3. Employees shall be protected from excavated materials, equipment, or other materials that could pose a hazard by falling or rolling into excavations.

4. Protection shall be provided by keeping such materials or equipment at least two (2) feet from the edge of excavations, by use of restraining devices that are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both if necessary.
5. Materials and equipment may, as determined by Responsible Person , need to be stored further than two (2) feet from the edge of the excavation if a hazardous loading condition is created on the face of the excavation.
6. Materials piled, grouped, or stacked near the edge of an excavation must be stable and self-supporting.

X Site Inspections

1. The designated competent person shall conduct daily inspections of excavations, adjacent areas, and protective systems for evidence of a situation that could result in possible cave-ins, failure of protective systems, hazardous atmospheres, or other hazardous conditions. An inspection shall be conducted by the competent person prior to the start of work and as needed throughout the shift. Inspections shall also be made after every rainstorm or other hazard-increasing occurrence. These inspections are only required when the trench will be or is occupied by the employees.
2. Where the designated competent person finds evidence of a situation that could result in a possible cave-in, failure of protective systems, hazardous atmosphere, or other hazardous conditions, exposed employees shall be removed from the hazardous area until precautions have been taken to assure their safety.
3. The designated competent person shall maintain a written log of all inspections conducted. This log shall include the date, work site location, results of the inspection, and a summary of any action taken to correct existing hazards.

XI. PROTECTIVE SYSTEM REQUIREMENTS

1. Employees in an excavation shall be protected from cave-ins by using either an adequate sloping and benching system or an adequate support or protective system. The only exceptions are:
 - a. excavations made entirely in stable rock; or

b. excavations less than five (5) feet in depth where examination of the ground by designated competent person provides no indication of a potential cave-in.

2. Protective systems shall be capable of resisting all loads that could reasonably be expected to be applied to the system.

3. Design by a registered professional engineer;

a. Sloping or benching systems designed in a manner other than those described in the preceding three options shall be approved by a registered professional engineer.

b. Designs shall be in written form and shall include at least the following information:

to i. the maximum height and angle of the slopes that were determined to be safe for a particular project; and

ii. the identity of the registered professional engineers who approved the design.

c. At least one copy of the design shall be maintained at the jobsite while the slope is being constructed. After that time, the design may be stored off the jobsite, and shall be maintained by Responsible Person.

4. Design of Support, Shield, and Other Protective Systems

a. The design of support systems, shield systems, and other protective systems shall be selected and constructed by designated personnel in accordance with the following requirements:

a. Designs using 29 CFR 1926, Subpart P, Appendices A, C and D

b. Timber shoring in trenches shall be designed in accordance with the requirements of the OSHA guidelines.

c. Aluminum hydraulic shoring shall be designed in accordance with the manufacturer's tabulated data or the requirements of the OSHA guidelines.

XII. Materials and Equipment

1. Materials and equipment used for protective systems shall be free from damage or defects that might affect their proper function.
2. Manufactured materials and equipment used for protective systems shall be used and maintained in accordance with the recommendations of the manufacturer, and in a manner that will prevent employee exposure to hazards.
3. When materials or equipment used for protective systems are damaged, the designated competent person shall ensure that these systems are examined to evaluate suitability for continued use. If the competent person cannot assure that the material or equipment is able to support the intended loads or is otherwise suitable for safe use, then such material or equipment shall be removed from service. The material or equipment shall then be evaluated and approved by a registered professional engineer before being returned to service.

III Changes to The Program

1. Any changes to the Excavation Safety Program shall be approved by a Registered Professional Engineer, and shall be reviewed by a qualified person as the job progresses to determine additional practices, procedures, or training needs necessary to prevent injuries. Affected employees shall be notified of procedure changes, and trained if necessary. A copy of this program shall be maintained at the jobsite by the job-site superintendent.

33. RIGGING/ MATERIAL HANDLING POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Rigging/Material Handling Procedure

Cranes, hoists (cherry pickers), and rigging equipment are used by Cox Energy, Industrial Coatings & Cleaning, LLC employees for lifting and moving materials. In order to maintain a safe workplace for its employees, only qualified individuals shall operate these devices. This program outlines the procedures for safe operations and the training requirements regarding cranes, hoists and rigging equipment.

Section I - Training

1. Operators will be trained in safe work standards including use of fire extinguishers. A CO2 or Type ABC fire extinguisher shall be kept in the crane cab or vicinity of the crane.
2. Documentation of employee, date of training and subject matter, including method used to test knowledge of material.
3. No employee shall operate cranes or equipment covered by this program until training has been complete and management has approved and designated him or her as a qualified operator.
4. Only those employees qualified by training or experience shall be allowed to operate equipment and machinery. By November 10th 2017, employers must ensure operators be qualified/certified by one of the following methods:
 - a. Certification by an accredited crane operator testing organization
 - b. Qualification by an audited employer program
 - c. Qualification by the U.S. military
 - d. Licensing by a government entity

Section II – Operational Rules

1. The rated load of the crane shall be plainly marked on each side of the crane, and if the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block and this marking shall be clearly legible from the ground or floor. The rated load marking on a hoist must be located and arranged so that it is evident to the personnel responsible for the safe operation of the hoisting unit. The operator shall have access to procedures applicable to the operation of the equipment. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.

2. Daily pre-use inspections shall be performed by the crane operator (designated as a competent person) prior to beginning shift and through observation during normal operation. Documentation is required to be retained for a 3 month period. Daily inspections shall include:

(a) Any deficiencies shall be repaired, or defective parts replaced, before continued use.

(b) All functional operating mechanisms for maladjustment interfering with proper operation.

(c) Deterioration or leakages in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems.

(d) Hooks, if deformations or cracks are found the hook shall be tagged out of service until repaired and tested by qualified personnel.

(e) Hoist chains, including end connections, for excessive wear, twist, distorted links interfering with proper function, or stretch beyond manufacturer's recommendations.

3. Monthly inspection records shall be made and kept on critical items in use such as brakes, crane hooks, and ropes. Employer shall keep & maintain certification record(s) which include the date(s) of inspection & the signature of person(s) who performed inspection. The same records must be kept on inspections of all other ropes. Monthly inspection records are required to be retained for 1 year.

4. Written reports shall be made and maintained on rated load tests showing the test procedures and confirming the adequacy of any repairs or alterations.

5. Safety devices are required to be on all equipment and must be in proper working order before operations begin. If any of the devices are not in proper

working order the equipment must be taken out of service and operations must not resume until the device is working properly again. Examples of safety devices may include: crane level indicator, boom stops, jib stops, foot pedal brake locks, horns, etc.

6. All manufacturer procedures applicable to the operational functions of equipment, including its use with attachments, must be complied with.

7. The manufacturer must approve all modifications/additions in writing. A registered professional engineer must be qualified with respect to the equipment involved, and must ensure the original safety factor of the equipment is not reduced.

8. Whenever there is a safety concern, the operator must have the authority to stop and refuse to handle loads until a qualified person has determined that safety has been assured.

9. Rope inspection shall be performed once a month and certify the date, signature of person performing the inspection. The use of Rope Grabs is prohibited.

10. All rope which has been idle for a period of a month or more due to shut down or storage of a crane on which it is installed shall be given a thorough inspection before it is used. This inspection shall be for all types of deterioration and shall be performed by an appointed or authorized person whose approval shall be required for further use of the rope.

11. Employers must make a monthly inspection & keep a record of hoist chains (including end connections) for

(a) excessive wear

(b) twist

(c) distorted links interfering with proper function

(d) Stretch beyond manufacturer's recommendation.

(e) The certification records must include:

(i) Date of inspection,

(ii) Signature of person performing inspection

(iii) Identifier of chain inspected.

12. Electrical equipment shall be so located or enclosed that live parts will not be exposed to accidental contact under normal operating conditions. When operating cranes near power lines rated 50 KV or below, minimum clearance between the power line and any part of the crane or load shall be 10 feet.

13. Monthly inspection must be conducted & records must be kept of all hooks with deformation or cracks. The certification records must include

(a) Date of inspection.

(b) Signature of person performing inspection.

(c) The serial number of other identifier of hook inspected.

14. A preventative maintenance program based upon the crane manufacturer's recommendations shall be established

15. Precautions must be taken before repairs are started. If any unsafe condition is found or repairs are necessary, "Warning or Out of Order" signs shall be placed on any crane or other hoisting equipment. Any key that allows operation of the equipment shall be secured to prevent unsafe starting of equipment being serviced. Employees must adhere to the Company's LO/TO Procedure.

16. Load Rating Chart - A substantial and durable chart with clearly legible letters and figures shall be provided with each crane and securely fixed in and onto the crane cab in a location easily visible to the operator while seated at this control station.

17. Whenever internal combustion engine powered equipment exhausts in enclosed spaces, test shall be made and recorded to see that employees are not exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres.

18. Equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for

adequate support and degree of level of the equipment are met.

- a. The manufacturer's procedures and prohibitions must be complied with when assembling and disassembling
- b. The assembly/disassembly of equipment must be directed by a competent and qualified person.

19. The work zone shall be identified by demarcating boundaries such as flag and range limiting devices, or defining the work zone as 360 degrees around the equipment up to the maximum working radius. The hazard assessment must determine if any part of the equipment could get closer than 20 feet to an energized power line.

20. If it is determined that any part of the equipment, load line or load could get closer than 20 feet to an energized power line then at least one of the following measures must be taken:

- a) Ensure the power lines have been deenergized and visibly grounded.
- b) Ensure no part of the equipment, load line or load gets closer than 20 feet to the power line.
- c) Determine the line's voltage and minimum approach distance permitted in Table A of the Electrical Safety Awareness Procedure.

Section III - Moving a Load

1. Center the hook over the load to keep the cables from slipping out of the drum grooves and overlapping, and to prevent the load from swinging when it is lifted.
2. Inspect the drum to verify that the cable is in the grooves.
3. Use a tag line when loads must traverse long distances or must otherwise be controlled. Manila rope may be used for tag lines.
4. Plan and check the travel path to avoid personnel and obstructions.

5. Lift the load only high enough to clear the tallest obstruction in the travel path.
6. Start and stop slowly. Shock loading is not allowed.
7. Land the load when the move is finished.
8. Choose a safe landing area.
9. Never leave suspended loads unattended
10. Do not position any load over a person nor should any person be permitted to place themselves under a load. Keep all bystanders and unauthorized personnel at least 10 feet from the outermost range of the crane or hoist and its load. The swing radius of the crane or hoist shall be barricaded to prevent unauthorized personnel from entering.
11. In an emergency where the crane or hoist has become inoperative, if a load must be left suspended, barricade and post signs in the surrounding area, under the load, and on all four sides. Lock open and tag the crane or hoist's main electrical disconnect switch.

Section IV – Rigging Operational Rules

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.
2. Each sling shall be inspected before being used. Each sling, fastenings, and all attachments shall be inspected by a designated competent person by the employer.
3. Rigging and Sling Inspections and Safety Requirements (a)Only select rigging equipment that is in good condition. (b)All rigging equipment shall also be inspected annually.

(c)Defective rigging equipment shall be removed from service and destroyed to prevent inadvertent reuse.

(d) Rigging equipment must have permanently affixed and legible identification markings as prescribed by the manufacturer that indicate the recommended safe working load. Rigging must not be loaded in excess of its recommended safe working load as prescribed on the identification markings by the manufacturer; and must not be used without affixed, legible identification markings.

(e) All devices shall be visually inspected prior to use and removed from service for any of the following conditions and to ensure the proper use and care:

(i) Synthetic slings with:

- Abnormal wear.
- Torn stitching.
- Broken or cut fibers.
- Discoloration or deterioration.

(ii) Wire rope slings with:

- Kinking, crushing, bird caging, or other distortions.
- Evidence of heat damage.
- Cracks, deformation, or worn end attachments.
- Six randomly broken wires in a single rope lay.
- Three broken wires in one strand of rope.

(iii) Hooks opened more than 15% at the throat.

- Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.

(iv) Alloy steel chain slings with:

- Cracked, bent, or elongated links or components.
- Cracked hooks.

(v) Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

4. Rigging equipment not in use shall be removed from the immediate work area so as not

to present a hazard to employees.

5. Tag lines shall be used unless their use creates an unsafe condition.

6. Latch hooks will be used. Hooks used in the connection between the hoist line and the personnel platform (including hooks on overhaul ball assemblies, lower load blocks, bridle legs, or other attachment assemblies or components) must be: a) Of a type that can be closed and locked, eliminating the throat opening. b) Closed and locked when attached.

7. All employees shall be kept clear of loads about to be lifted and of suspended loads.

Section V – Signaling

1. Signals to the operator shall be in accordance with the standard hand signals prescribed by the applicable ANSI standard for the type of crane in use unless voice communications equipment (telephone, radio, or equivalent) is used.

2. A signal person must be provided for the following situations:

a) The point of operation is not in full view of the operator

b) The view is obstructed when the equipment is traveling

c) The operator or the person handling the load determines it is necessary due to site specific concerns

2. Signals shall be discernible or audible at all times.

3. Some special operations may require addition to or modification of the basic signals. For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator and shall not be in conflict with the standard signals.

DAILY GUIDE FOR OVERHEAD CRANE INSPECTIONS

Yes	No	All functional operating mechanisms for maladjustment interfering with proper operation
Yes	No	Leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems
Yes	No	Hooks for deformation, chemical damage, or cracks. Hooks having more than 15% in excess of normal throat opening or more than 10 degrees twist from the plane of the unbent hook.
Yes	No	Hooks. Dye penetrant, magnetic particle, or other suitable crack-detecting inspection performed at least once a year.
Yes	No	All functional operating mechanisms for excessive wear of components
Yes	No	Rope reeving for noncompliance with manufacturer's recommendations
Yes	No	Condition of wire rope.
Yes	No	Deformed, cracked, or corroded members
Yes	No	Cracked or worn sheaves or drums.
Yes	No	Loose bolts, nuts, or rivets
Yes	No	Worn, cracked, or distorted parts such as pins, bearings, shafts, gears, rollers, locking and clamping devices
Yes	No	Excessive wear in brake system parts, linings, pawls, and ratchets
Yes	No	Load, wind and other indicators over their full range, for any significant inaccuracies
Yes	No	Gasoline, diesel, electric, or other power plants for improper performance or noncompliance with applicable safety requirements.
Yes	No	Electrical apparatus, for signs of pitting or any deterioration of controller, master-switches, and push button stations.
Yes	No	Required warning labels absent or illegible.
Yes	No	Supporting structure, trolley and bridge for alignment and continued ability to support the imposed loads.

34. WELDING, CUTTING & BRAZING POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Welding, Cutting, & Brazing:

Management is responsible for the safe usage of cutting and welding equipment.

- A. Establish areas for cutting and welding
- B. Designate individual(s) responsible for cutting, welding, and brazing operations.
- (C) Ensure personnel are properly trained
- (D) Advise all contractors about flammable materials

The individual responsible for the cutting/welding/burning operation shall inspect the area before work starts, he/she shall review the precautions to be followed in doing the work. These precautions shall be documented on the welding/cutting/burning evaluation form, (Appendix A).

A. Fire Protection:

1. If the object to be welded or cut cannot readily be moved, all movable fire hazards in the vicinity shall be taken to a safe place.
2. If the object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards shall be used to confine the heat, sparks, and slag, and to protect the immovable fire hazards
3. Spark Containment and Flame Penetration Prevention must be practiced.
 - a. Suitable fire extinguishers shall be available
 - b. A fire watch may be required
 - c. Torches or welding equipment are shut off when unattended
 - d. Special care shall be taken when welding on containers that have held combustible or flammable materials.
4. If the requirements stated in paragraphs A (1)- (4) of this section cannot be followed then welding and cutting shall not be performed.
5. Suitable fire extinguishing equipment shall be maintained in a state of readiness for instant use. Such equipment may consist of pails of water, buckets of sand, hose, or

portable extinguishers depending upon the nature and quantity of the combustible material exposed.

6. Fire watchers shall be required whenever welding or cutting is performed in locations where other than a minor fire might develop, or any of the following conditions exist:
 - a. Combustible material closer than 35 feet to the point of operation.
 - b. Combustibles more than 35 feet away but are easily ignited by sparks.
7. Fire watchers:
 - a. Shall have fire extinguishing equipment and be trained
 - b. Familiar with facilities for sounding an alarm
 - c. Try to extinguish them only when obviously within the capacity of the equipment available, or otherwise sound the alarm
 - d. Maintained for at least a half hour after completion of welding or cutting operations
8. Cutting or welding shall not be permitted in the following situations:
 - a. In the presence of explosive atmospheres (mixtures of flammable gases, vapors, liquids, or dusts with air),
 - b. or explosive atmospheres that may develop inside uncleaned or
 - c. improperly prepared tanks or in areas with an accumulation of combustible dusts.
 - d. No welding, cutting, or other hot work shall be performed on used drums, barrels, tanks or other containers until absolutely certain that there are no flammable materials present
 - e. When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes shall be removed from the holders and the holders carefully located so that accidental contact cannot occur and the machine shall be disconnected from the power source.
 - f. Torch valves shall be closed and the gas supply to the torch shut off whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight
 - g. The work area shall be shielded as to protect other personnel from inadvertent arc flash.

- h. Employees exposed to the hazards created by welding, cutting, or brazing operations shall be protected by the appropriate personal protective equipment.
- i. After cutting/welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.
- j. Mechanical or natural ventilation shall be used, to control air-borne contaminants created by the cutting/welding process in compliance with 29CFR 1910.Sub Part Z, Toxic and Hazardous Substances and 29 CFR 1910. Sub Part Q, Welding, Cutting, and Brazing.
 - 1. Replacement air shall be clean and respirable
 - 2. Oxygen shall not be used for cleaning, ventilation, or cooling the work area
- k. Under no condition shall acetylene be utilized at a pressure in excess of 15 psig.

35. ENVIRONMENTAL SPILL CONTROL POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Environmental - Spill Prevention Plan:

1. Purpose:

This policy has been developed to protect the environment by preventing spills and leaks from occurring, or minimizing the impact, during the course of construction. This plan is also written to meet regulatory & client requirements along with best practices adopted by COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC relating to Spill Prevention Control and Countermeasure (SPCC) and the Stormwater Pollution Prevention Plan (SWPPP). COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC site project management shall additionally develop their own contingency plans for spills to plan and prepare for spill situations arising from their operations.

2. Notification:

Any spill, regardless of size, shall be reported immediately to COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC site management, who will then initiate the Contractor Notification Program with the applicable client.

3. Planning and Preparation-Spill Kits

Each trade having vehicles, equipment, or chemicals on-site or responsible for the handling or installation of equipment containing chemicals (radiators, batteries, etc.) on site shall have the appropriate resources for spill prevention and abatement. Standard spill kit contents should include, but are not limited to:

- Pads, booms, pillows, and/or granular/powder absorbents
- Gloves, goggles, apron
- Dustpan and hand broom
- Poly disposal bags and labels

Absorbent materials shall be appropriate to the types & volume of chemicals/products used or stored or that COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC site project management are otherwise responsible for.

4. Universal Sorbents

- Absorb all types of water-based and oil-based liquids
- Ideal where many types of liquids are present or in use such as cutting fluids, lubricants, and coolants
- Not appropriate for a spill kit for work that is near a creek area, bar ditch, pond, or where water may otherwise be standing or flowing

5. Oil-Only Sorbents

- Absorb all petroleum-based liquids and repel water
- Will float on water and absorb oil/fuel products Hazmat Sorbents
- Specifically designed and intended for use with aggressive fluids such as acids and bases
- Acid neutralizing or amalgamation powders should also be on hand to deal with battery or mercury spills, or stand-alone spill kits shall be available

6, Spill Kit Materials Contained in Vehicles & Equipment

To minimize the potential impact of a spill, COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC site project management shall keep sorbents (boom, pad, granular, etc.) in vehicles and equipment to immediately abate the flow of any spilled material. As an alternative option, spill kits shall be maintained in the immediate work area or close proximity to work operations where vehicles or equipment are in operation.

- Each company or COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC storing chemicals or fuels on a project site is responsible for safe storage meeting recognized best management practices (BMP's) and specific requirements meeting Federal, State and Local requirements.
- Fuels, chemicals, and chemical storage tanks must be approved by COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC before arriving on-site
- All fuels stored in quantities greater than 5 gallons shall be contained/stored within a secondary containment unit or double-wall tank.
- Truck mounted transfer tanks are authorized when properly secured in or on truck bed, properly labeled, and used in accordance with manufacturer requirements. Transfer tanks shall not be used in any other manner or method.

- Fuel storage should be located away from areas that may be accessed by vehicles/equipment or protected from vehicle equipment damage by “jersey barriers”, bollards, or other substantial protection approved by COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC
- Fuel and chemical storage is only authorized in areas designated by COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC
- Fuel cans are to be a metal-type safety can with flame arrestor
- Fuel cans when not in use shall be stored in an approved flammable locker/cabinet, grounded per manufacturer requirements
- Fuel and chemical storage areas shall have the appropriate number and type of fire extinguishers based on the size, configuration, and fuels or chemicals stored in the location(s) specified per OSHA requirements
- Fuel storage areas are to have a spill kit in the immediate area
- A catch pan should be utilized to capture small leaks when fueling
- Any spilled material into a tub shall be immediately cleaned up with absorbent material and properly disposed of at COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC site waste collection point
- Fuel or chemical drums stored on site shall be placed on containment pallets with a cover over the storage area to prevent rainwater collection
- Water-based floor sealers and concrete curing compounds are exempted from this requirement
- Chemicals may not be stored within any building without consent from the COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC superintendent. Chemicals in the building are restricted to immediate use, (within 24 hours), and must have signage affixed identifying the chemical/product, hazards, and the responsible Company contact information. Proper barricades must be in place to prevent inadvertent contact or spills and to prevent work over the area.

7. Maintenance Procedures

1. Vehicle and equipment maintenance on the construction site can easily pose environmental risks if adequate precautions are not taken. Maintenance on vehicles and equipment shall only be conducted by qualified, designated persons to minimize the potential for error, injury, and spills.
2. Sub-contractors are responsible for service trucks and maintenance conducted to ensure work is conducted with controls in place to capture or minimize spills.
3. When performing work on fuel or hydraulic systems, changing fuel/oil filters, radiators, and other components that have the potential to leak or bleed during maintenance procedures, the following controls shall be in place.
4. Notification of service work is to be given before work commences to responsible trade
5. Personnel performing maintenance have emergency contact information in the event of a spill or work is supervised by the sub-contractor
6. Maintenance personnel are to be instructed on the requirements of this program and their associated duties/responsibilities
7. Designated maintenance areas do not currently exist at COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC project site, but maintenance is **NEVER** to be conducted adjacent to any creek, stream, ditch, or other waterway
8. Plastic sheeting or catch pans properly positioned under equipment
9. Spill kit materials in service truck or within a short distance of the area in which work is being performed
10. Any spilled material onto sheeting or into secondary containment shall be immediately cleaned up with absorbent material and properly disposed of by the service provider selected by the Company and taken to the Cox Energy, Industrial Coatings & Cleaning, LLC site waste collection point or the clients waste collection point

8. Spills

1. Each employee on The Cox Energy, Industrial Coatings & Cleaning, LLC Project is responsible for any spills as a result of their work operations, vehicles, equipment, or fuels/chemicals brought on site or otherwise responsible for. Any spill of petroleum product or chemical requires notification to The Cox Energy, Industrial Coatings & Cleaning, LLC

immediately after the spill is abated, and sooner if assistance is required. The Cox Energy, Industrial Coatings & Cleaning, LLC shall notify the client of the event within a reasonable timeframe, but not to exceed 1 hour after initial notification.

9. Spill Response Procedures from the SPCC Plan.

1. Secure the area and identify the spilled material using the container label and/or the SDS.
2. If material is flammable, bring an appropriate fire extinguisher into the area.
3. Turn off any operating equipment in the area.
4. Notify the Cox Energy, Industrial Coatings & Cleaning, LLC Safety & Health coordinator or the Project Manager who will help determine the appropriate course of action.
5. If a fire or other serious emergency occurs follow the emergency response procedures for fire and evacuation.
6. Responders shall use gloves, boots, safety/goggles and other personal protective equipment as necessary. Do not work alone.
7. Spills of hydraulic fluid, oil and other petroleum products should always be cleaned up immediately to prevent discharge of these fluids with storm water runoff. Use booms, pads, pillows, rags or other absorbent material contained in the spill kit.
8. Spill kits are available on the site. Spill kits shall be provided on each Company Project.
9. Soil or other media that has been contaminated with petroleum or other pollutants should be excavated or removed to prevent contaminated discharges from reaching a property boundary or creek. Petroleum contaminated soil should be cleaned up and disposed of properly. Scoop up the material with appropriate equipment into a compatible leak-proof container or drum. Storage containers should be kept closed, clean, and free of oily residue.
10. Initially label the container with a general description of the contents. Contact the Safety & Health Coordinator responsible for the tank for proper EPA and DOT Labels and disposition.
11. Any reusable equipment used with flammable material should be cleaned and allowed to dry in a well-ventilated area away from heat, flame or spark.

12. Replenish all spill response equipment used during the event.

13. Complete the Spill Report Form and submit to the Cox Energy, Industrial Coatings & Cleaning, LLC Safety & Health Department.

10. Spills to Waterways

1. Spills to creeks, streams, bar ditches, surface water, or other waterway are generally considered the most severe type of spill situation, and all personnel must understand the importance of planning and response to avoid a catastrophic environmental situation. Oil-only/floating booms shall be placed and secured on the water, downstream, to prevent migration off site. The Cox Energy, Industrial Coatings & Cleaning, LLC site project management and/or their approved spill contractor, is responsible to maintain a floating boom collection system that can be installed as well to fully capture spilled petroleum's. The Cox Energy, Industrial Coatings & Cleaning, LLC Safety & Health Department must be contacted immediately after spill is reported, or as soon as possible if assistance is required. Spills to waterways can be disastrous and cleanup for the affected area can be incredibly difficult and expensive. The Company will contact the client within one hour of the initial report of the spill to begin installation of the floating boom collection system. All response efforts must be initiated as soon as possible.

11. Cox Energy, Industrial Coatings & Cleaning, LLC Spill Response Contacts

1. The services of a spill response team for The Cox Energy, Industrial Coatings & Cleaning, LLC Projects shall be retained or a service agreement planned and developed to expedite spill cleanup response.

36. STORM WATER POLLUTION PREVENTION POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Storm Water Pollution Protection Plan:

1. Stormwater runoff from construction sites can cause significant harm to our rivers, lakes, and coastal waters a (SWPPP) is required (by the construction general permit) and will help prevent stormwater pollution. A SWPPP is more than just a sediment and erosion control plan. It describes all the construction site operator's activities to prevent stormwater contamination, control sedimentation and erosion, and comply with the requirements of the Clean Water Act. This is a summary of requirements of the SWPPP for COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC Company and does not relieve them of their duty to comply with applicable Federal, State, and Local environmental regulations.

2. Best Management Practices

a. The following best management & good housekeeping practices will be followed on-site during the construction project:

- An effort will be made to store on-site, only enough materials required to do the job.
- All materials stored onsite will be stored in a neat, orderly manner in their appropriate containers and if possible, under a roof or other enclosure.
- Products/chemicals will be kept in their original containers with the original manufacturer's label.
- Product specific practices are to be followed according to the manufacturer's recommendations.
- Substances will not be mixed with one another unless recommended by the manufacturer.
- Whenever possible, all of a product will be used up before disposing of the container.
- Manufacturer's recommendations for proper use and disposal will be followed.
- Designated areas for equipment maintenance and repair (control of oil, grease and fuel spills).
- Waste receptacles with regular collection for litter and construction debris.

- Equipment wash-down area on-site only with appropriate control of wash waters (Including concrete truck wash down).
- Protected storage area for chemicals, paints, solvents, fertilizers and other potentially toxic materials.
- Adequately maintained sanitary facilities.
- Proper control of raw materials stored onsite (for example, sand, aggregate and cement used in the manufacture of concrete or stockpiles of topsoil).
- During precipitation events, materials are to be protected, covered and/or impounded so that pollutants cannot discharge from storage areas.
- Removal of inlet protection barriers during major rainfall events if the potential of flooding occurring and verification that reinforced filter fabric fences (silt fences) are in proper condition prior to all rainfall events.
- Supervision shall inspect daily to ensure proper use and disposal of materials onsite.
- No solid materials shall be discharged to surface waters or buried on site.
- All solid waste material including disposable materials should be collected in containers or closed dumpsters.
- Dirt stockpiles will be properly protected from erosion by the use of silt fencing. Silt fencing, if required, will be installed around the perimeter of the site.
- No pumping or dewatering to creeks or streams is permitted.
- The following sources of non-storm water discharges may be combined with storm water discharges at this site:
 - Potable water sources including waterline flushings
 - Uncontaminated groundwater, spring water, diverted stream flows (pumped or infiltrated)
 - All effluents are to be controlled as required to minimize creation of sediment discharge to offsite drainage structures.
 - No other discharges to waterways are permitted.

37. CORPORATE SUSTAINABILITY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Corporate Sustainability Plan:

1. Corporate sustainability is a business approach that creates long-term consumer and employee value by creating a "green" strategy aimed toward the natural environment and taking into consideration every dimension of how a business operates in the social, cultural, and economic environment.
2. The Cox Energy, Industrial Coatings & Cleaning, LLC. Sustainability Plan will provide a sustainability roadmap for the organization to establish a more environmentally responsible reputation, improve efficiencies, increase brand loyalty, and secure shareholder and employee satisfaction.
3. The first step to developing an effective corporate-wide sustainability program is to get engagement from the entire organization. From shareholders and management to entry-level positions and contractors, it's important to generate interest within the entire organization before moving forward with a formal plan. Make the development process a team effort and ask for insights and feedback from all levels of employment.
4. In order to accurately assess our progress towards the corporate sustainability goals, we must first determine our corporate sustainability metrics by asking the following questions about your organization:
 - a. How much water/power/other resources are currently being consumed?
 - b. What's the current carbon footprint? What will it take to become carbon neutral?
 - c. How much company waste is being currently being diverted from landfills?
What is the organization's recycling rate?
 - d. How engaged are company stakeholders?
 - e. What's the current renewable energy use?
 - f. How can employees be empowered to participate in more environmentally conscious practices?
5. The Cox Energy, Industrial Coatings & Cleaning, LLC shall start their sustainability planning by auditing the materials and methods we use in our construction processes and

examining how we use resources at our buildings and facilities. It's important to understand the starting point via an internal audit. Through analysis of our company's current environmental footprint, we can then establish a benchmark to use to assess the success of sustainability efforts moving forward.

6. Setting sustainability goals shall be both big picture and specific in nature. What the Company hopes to ultimately achieve as a business when it comes to sustainability? What's achievable for this year? Once goals have been established based on pre-determined sustainability metrics, it's time to outline specific initiatives that will be implemented to achieve those goals.

7. Sustainability goals for Fiscal Year 2020:

- a. Replacing, as necessary, older model diesel engine equipment with certified "clean idle" diesel engine equipment.

- b. Reclaiming fiber through recycling OCC (Old Corrugated Containers) and Mixed Paper and converting that discarded fiber into 100 percent recycled packaging, thereby reducing our impact and our customer's impact on the environment.

- c. Recycling waste oils and fluids from equipment maintenance activities.

- d. Recycling all metallic wastes through segregation and classification.

- e. Make more use of energy efficient building materials and supplies; energy efficient light bulbs, more efficient use of building HVAC systems, recycling of printer cartridges/ink toner, etc.

8. Through environmental education, Cox Energy, Industrial Coatings & Cleaning, LLC shall ensure that everyone in the company understands the internal and external benefits of the Corporate Sustainability Program. The development process shall be a team effort and input, insights, and feedback from all levels of the organizational structure shall be expected.

38. CORPORATE SOCIAL RESPONSIBILITY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

Corporate Social Responsibility Policy:

1. Corporate social responsibility (CSR, also called corporate conscience, corporate citizenship or responsible business) is a form of corporate self-regulation integrated into a business model. CSR policy functions as a self-regulatory mechanism whereby a business monitors and ensures its active compliance with the spirit of the law, ethical standards and national or international norms.

2. A robust CSR program is an opportunity for companies to demonstrate their good corporate citizenship and protects the company from outsized risk by looking at the whole social and environmental sphere that surrounds the company.

3. The Cox Energy, Industrial Coatings & Cleaning, LLC Corporate Social Responsibility Plan shall incorporate the following:

a. Environmental efforts: One primary focus of corporate social responsibility is the environment. Businesses regardless of size have a large carbon footprint. Any steps they can take to reduce those footprints are considered both good for the company and society.

b. Philanthropy: Businesses can also practice social responsibility by donating money, products or services to social causes. Larger companies tend to have a lot of resources that can benefit charities and local community programs.

c. Ethical labor practices: By treating employees fairly and ethically, companies can also demonstrate their corporate social responsibility. This is especially true of businesses that operate in international locations with labor laws that differ from those in the United States.

d. Volunteering: Attending volunteer events says a lot about a company's sincerity. By doing good deeds without expecting anything in return, companies can express their concern for specific issues and support for certain organizations.

4. The pressing issues consumers most want companies to address include; economic development, the environment, human rights, poverty and hunger. The next generation of employees is seeking out employers that are focused on the triple bottom line: people, planet and revenue. Coming out of the recession, corporate revenue has been getting

stronger. Companies are encouraged to put that increased profit into programs that give back.

5. The Cox Energy, Industrial Coatings & Cleaning, LLC recognizes how important social responsibility is to their customers and the many companies it works with and shall focus on and practice excellent corporate social responsibility as outlined in the proceeding paragraphs

39. ACCESS TO EMPLOYEE MEDICAL & EXPOSURE RECORDS POLICY

Cox Energy, Industrial Coatings & Cleaning, LLC

Access to Employee Medical & Exposure Records

I. Purpose:

The purpose of the Cox Energy, Industrial Coatings & Cleaning, LLC employee access to medical and exposure records is to ensure they will have the information needed in the future, if a potential job-related health issue should arise. All medical and exposure records shall be retained according to all regulatory requirements.

II. Scope:

This policy covers all employees (both temporary and permanent) of Cox Energy, Industrial Coatings & Cleaning, LLC for all projects in which said employees are participants.

1. Required and employee sensitive records shall include the following:

a. "Employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician.

b. Environmental/Industrial Hygiene (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other forms of sampling, as well as related collection and analytical methodologies, calculations, and other data relevant to interpretation of the results obtained.

c. Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of drugs or alcohol.

d. Safety Data sheets which indicate that materials may pose a hazard to human health.

e. Employee Medical Records concerning health status of an employee which are made or maintained by professional licensed health care personnel.

2. Retention and Preservation of employee sensitive records shall be as follows:

a. Employee medical records shall be preserved and maintained for at least the duration of employment plus a period of thirty (30) years.

b. Employee Exposure Records shall be preserved and maintained for a period of at least thirty (30) years.

c. Safety Data Sheets need not need to be retained for any specific period as long as some record of the identity of the substance or agent, where it was used, and when it was used is retained for thirty (30) years.

d. Environmental/Industrial Hygiene and/or Biological monitoring results designated as exposure records by a specific occupational safety and health standard shall be preserved and maintained as required by the specific OSHA standard.

e. Analyses using exposure or medical records shall be preserved and maintained for at least thirty (30) years.

f. Upon an employee's first entering into employment, and at least annually thereafter, information must be given to current employees of the existence, location, availability and the person responsible for maintaining and providing access to records and each employee's rights of access to these records.

3. Whenever an employee or designated representative requests, access to records must be provided in a reasonable time, place, and manner. If access to records cannot reasonably be provided within fifteen (15) working days, the employer shall within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available.

4. Whenever access is requested to an analysis which reports the contents of employee medical records by either direct identifier (name, address, social security number, payroll number, etc.) or by information which could reasonably be used under the circumstances indirectly to identify specific employees (exact age, height, weight, race, sex, date of initial employment, job title, etc.), personal identifiers must be removed before access is provided.

5. Whenever an employee or designated representative requests a copy of a record, that record must be provided at no cost.

6. Whenever an employer is ceasing to do business, the employer shall transfer all records subject to this section to the successor employer. Whenever an employer either is ceasing to do business and there is no successor employer to receive and maintain the records, or intends to dispose of any records required to be preserved for at least thirty (30) years, the employer shall notify affected current employees of their rights of access to records at least three (3) months prior to the cessation of the employer's business. Also, these records must either be transferred to the National Institute for Occupational Safety and Health (NIOSH) or notify the Director of NIOSH in writing of the intent to dispose of the records three (3) months before that disposal.

40. HEAT HAZARD/ILLNESS PREVENTION POLICY

Cox Energy Industrial Coatings, & Cleaning LLC

Heat Hazard/Illness Prevention Policy

I. Policy Statement:

This Heat Hazard/Illness Prevention Plan (HHIPP) applies to employees of Cox Energy Industrial Coatings, & Cleaning LLC, who work in indoor/outdoor areas of employment or on job tasks where the environmental risk factors for heat illness are present, and are at risk for developing heat illnesses if they do not protect themselves appropriately. It is the policy of Cox Energy Industrial Coatings, & Cleaning LLC that any employee participating in job tasks where environmental risk factors for heat illness are present will comply with the procedures in this document and in the Injury and Illness Prevention Program. A copy of this Heat Illness Prevention Plan will be made available at each job site in both English and the language understood by the majority of employees' of the procedures in this document and in the Injury and Illness Prevention Program.

II. Scope:

1. This HHIPP includes steps for providing all appropriate PPE and ensuring potable drinking water is provided in sufficient amounts and temperatures and humidity conditions are monitored, shade is available as required by the law, and high heat procedures are followed, employee training is in place, emergency response procedures are documented, and acclimatization of employees is accounted for.
2. Supervisors shall receive training in the prevention of heat-related illnesses prior to supervising employees working in heat.
3. Supervisors shall be trained in the employer's heat illness procedures to prevent heat illness and procedures to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.
4. Supervisors shall ensure personal factors that contribute to heat-related illness are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. The most common personal physical factors that can contribute to heat related illness are age, weight, physical fitness, health factors, drug/alcohol use, prior incidents of heat-related illness, and acclimatization.
5. Procedures shall be in place to control the effects of environmental factors that can contribute to heat-related illness. The most common environmental factors are air temperature, humidity, radiant heat sources and air circulation. Controls are to include: temperature controls such as recirculation fans, electrolyte drinks to provide salt replacement, removal of radiant heat sources, cooling PPE, and work scheduling for cooler periods of the day such as night shift.

III. Water:

Cox Energy Industrial Coatings, & Cleaning LLC shall provide fresh, potable, and suitable cool water, free of charge, as close as practicable to areas where employees are located. Where water is not plumbed or

otherwise in continuous supply, the company will take appropriate actions to ensure that an adequate quantity of potable water is available to company workers. Supervisors will visually examine the water to ensure purity and check that it is adequately cool by pouring some on their skin. Provided coolers shall be made tamper resistant and shall be **dated and sealed**. Drinking water coolers shall not be used if they are more than one-day old.

When employees are working in large areas, water will be placed in several locations also placed in designated shade areas and near restrooms.

Cox Energy Industrial Coatings, & Cleaning LLC shall ensure that 1 quart of water per person per hour is available at the start of the shift and will have a water replenishment system (including designated responsibility) in place.

Cox Energy Industrial Coatings, & Cleaning LLC shall encourage employees to drink water frequently and to report low water levels, as well as warm or dirty water containers, to supervisors.

IV. Procedures for Monitoring the Weather:

1. Supervisors will be trained and instructed to check in advance the extended weather forecast. Weather forecasts can be checked with the aid of the internet (<http://www.nws.noaa.gov/>), by calling the National Weather Service phone numbers, or by checking the Weather Channel TV Network. The work schedule will be planned in advance, taking into consideration whether high temperatures or a heat wave is expected. Routine advance weather monitoring will take place between the months of May and September; with additional advance monitoring conducted as needed during the remainder of the year.

2. In addition to advance weather monitoring, supervisors shall utilize one of the aforementioned weather services to review the day's forecasted temperature and humidity level prior to the start of work. Temperature and humidity levels will also be monitored on the work site throughout the day and compared to the National Weather Service Heat Index to evaluate the risk level for heat illness and determine when precautionary heat illness prevention measures should be taken. Temperature will be monitored by means of dry bulb thermometer in degrees Fahrenheit. Temperature measurement

V. Shade:

a. Cox Energy Industrial Coatings, & Cleaning LLC shall provide shade when the temperature exceeds 80 degrees Fahrenheit. Shade areas will be open to the air or provided with ventilation or cooling. Enough shade will be provided to accommodate the number of employees on break or recovery period at any given time.

b. Cox Energy Industrial Coatings, & Cleaning LLC shall ensure that employees in shaded areas can sit in a normal posture fully in the shade without having contact with one another. The shade shall be located as close as practicable to the work area. During meal periods, the amount of shade available shall be enough to accommodate the number of employees on meal break and those seeking cool-down rest periods.

- c. Cox Energy Industrial Coatings, & Cleaning LLC shall encourage employees to take a preventative cool-down rest in the shade when they feel the need to protect themselves from overheating. Employees taking cool-down breaks will be monitored and asked if they are experiencing symptoms of heat illness and will be encouraged to remain in the shade until any signs or symptoms have abated. Employees will be given no less than 5 minutes to rest in the shade, in addition to time needed to access the shade.
- d. Cox Energy Industrial Coatings, & Cleaning LLC's policy shall be that any employee who exhibits signs or reports symptoms of heat illness while taking a preventative cool-down rest shall be provided with appropriate first aid or emergency response.
- e. Employees suffering from heat illness or believing a preventative recovery period is needed, shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling. Such access to shade shall be permitted at all times.

VI. High Heat Procedures:

Cox Energy Industrial Coatings, & Cleaning LLC shall implement the following high heat procedures when the temperature equals or exceeds 90 degrees Fahrenheit.

- a. A supervisor, or a qualified designee, shall directly observe employees, for signs and symptoms of heat illness. Each supervisor, or qualified designee, shall be responsible for observing no more than 20 employees.
- b. If impractical to directly observe employees, a mandatory buddy system shall be implemented or; regular communication with employees working solo shall be implemented by either radio or cellular phone or other effective observation such as periodic checks.
- c. Employees shall be observed for symptoms of heat illness and will be reminded throughout the work shift to drink plenty of water.
- d. Cox Energy Industrial Coatings, & Cleaning LLC shall designate 1 or more employees to call for emergency medical procedures, and will allow any employees to call for emergency services when a designated person is not available.
- e. Cox Energy Industrial Coatings, & Cleaning LLC shall closely supervise new employees for the first 14 days of employment, unless the new employee indicates at the time of hire that they have been doing similar work for at least 10 of the past 30 days, and for more than 4 hours per day.
- f. Cox Energy Industrial Coatings, & Cleaning LLC will provide a pre-shift meeting during periods of high heat to remind employees:
 - 1. of the company's high heat procedures.
 - 2. to drink plenty of water.
 - 3. of their right to take cool-down rest periods when necessary.

VII. Training:

1. Cox Energy Industrial Coatings, & Cleaning LLC will provide training to all supervisors, and affected employees, prior to their engagement in work that could result in exposure to risk factors for heat-related illness. Training shall be of a preventative nature and supervisors are required to complete training prior to supervising affected employees. Furthermore, supervisors over employees exposed to heat stress shall be trained in the company's heat illness response and procedures in the event company employees exhibit symptoms of heat stress or illness. Training shall include:

- a. An explanation of the employer's responsibility to provide shade, water, cool-down rest periods, and access to first aid, as well as the employee's right to exercise their rights without fear of retaliation.
- b. Environmental and personal risk factors for heat illness.
- c. The signs and symptoms of heat illness.
- d. The importance of immediately reporting signs and symptoms of heat illness – and appropriate first aid to be taken.
- e. Importance of frequent consumption of water.
- f. Importance of acclimatization.
- g. Cox Energy Industrial Coatings, & Cleaning LLC's response plan to a case of possible heat illness.
- h. Supervisor and employee responsibilities.
 - 1. Supervisors will be taught procedures to follow in case of an employee reporting or displaying symptoms of heat illness.
 - 2. Supervisors will be trained how to monitor weather reports and how to respond to hot weather advisories.

VIII. Emergency Response Procedures:

All supervisors and management personnel of Cox Energy Industrial Coatings, & Cleaning LLC are required to take immediate action if an employee exhibits signs or symptoms of heat illness. Emergency response procedures will include but not be limited to the following actions:

- a. Ensuring that effective communication by voice, observation, or electronic means are maintained so that employees at the high temperature work site can contact a supervisor or emergency medical service when necessary.

b. Cellphones, company radio, email and other electronic devices will be used for communication. If electronic devices are not reliable forms of communication, the Company shall develop alternative means of summoning emergency medical services.

c. Employees and supervisors will be trained to recognize symptoms of heat stress, such as decreased level of consciousness, disorientation, irrational behavior, staggering, vomiting and convulsions; and are required to take immediate action if any employee exhibits signs of the mentioned symptoms of heat illness

d. Supervisors and employees will be taught first aid measures and how emergency services are to be provided to affected employees.

e. Employees exhibiting signs or symptoms will be monitored and shall not be left alone or sent home without being first offered onsite first aid and /or being provided with emergency medical service.

f. If deemed necessary, emergency medical services will be contacted, and employees will be transported to a place where they can be reached by emergency medical providers.

g. In emergency events – clear and precise directions to work site will be provided to emergency responders.

h. In the event that a work site is in a difficult to find location, an employee will be sent to meet emergency medical services at the nearest landmark; and lead them to the work site.

IX. Acclimatization:

a. New employees and employees who have not previously worked in environments where the possibility that heat illness may occur will be given an opportunity for their bodies to gradually be exposed to heat. Employees will be given an opportunity to adapt to the heat by working in the heat for at least 2 hours a day, between 4 to 14 days.

b. Cox Energy Industrial Coatings, & Cleaning LLC shall also monitor employees during a heat wave. “Heat wave” being defined as any day the predicted temperature is at least 80 degrees Fahrenheit and at least 10 degrees Fahrenheit higher than the average high daily temperature in the preceding 5 days. Monitoring can be done by either the supervisor or by use of the buddy system.

c. Cox Energy Industrial Coatings, & Cleaning LLCs shall stress to all new employees of the importance of immediately reporting to their supervisor symptoms and signs of heat stress in themselves or in co-workers.

d. Physical factors that contribute to heat-related illness should be taken into consideration before performing a task. The most common physical factors that can contribute to heat-related illness are type of work, level of physical activity and duration, and clothing color, weight and breathability.

41. COLD WEATHER HAZARD/ILLNESS PREVENTION POLICY

Cox Energy Industrial Coatings, & Cleaning LLC

Cold Weather Hazard/Illness Prevention Policy

I. Policy Statement:

This Cold Weather Hazard/Illness Prevention Plan (CWHIPP) applies to employees of Cox Energy Industrial Coatings, & Cleaning LLC, who work in indoor/outdoor areas of employment or on job tasks where the environmental risk factors for cold hazards/illness are present and are at risk for developing cold illnesses if they do not protect themselves appropriately. It is the policy of Cox Energy Industrial Coatings, & Cleaning LLC that any employee participating in job tasks where environmental risk factors for cold illness are present will comply with the procedures in this document and in the Injury and Illness Prevention Program. A copy of this Cold Weather Hazard/Illness Prevention Plan will be made available at each job site in both English and the language understood by the majority of employees of the procedures in this document and in the Injury and Illness Prevention Program.

II. Scope:

1. This CWHIPP includes steps for providing all appropriate PPE and temperatures/humidity conditions are monitored, cold weather procedures are followed, employee training is in place, emergency response procedures are documented, and acclimatization of employees is accounted for.
2. Supervisors shall receive training in the prevention of cold-weather-related illnesses prior to supervising employees working in cold weather.
3. Supervisors shall be trained in the employer's cold weather hazard/illness procedures to prevent cold weather illness and procedures to follow when a employee exhibits symptoms consistent with possible cold illness, including emergency response procedures.
4. Supervisors shall ensure personal factors that contribute to cold-related illness are taken into consideration before assigning a task where there is the possibility of a cold-related illness occurring. The most common personal factors that can contribute to cold-related illness are age, weight/fitness, health factors, and acclimatization.
5. Procedures shall be in place to control the effects of environmental factors that can contribute to cold-related illness. The most common environmental factors are air temperature and wind. Controls could include warming PPE, and work scheduling for warmer periods of the day such as afternoon shift.

III. Procedures for Monitoring the Weather:

1. Supervisors will be trained and instructed to check in advance the extended weather forecast. Weather forecasts can be checked with the aid of the internet (<http://www.nws.noaa.gov/>), by calling the National Weather Service phone numbers, or by checking the Weather Channel TV Network. The work schedule will be planned in advance, taking into consideration whether cold temperatures are expected.

Routine advanced weather monitoring will take place between the months of October and April with additional advance monitoring conducted as needed during the remainder of the year.

2. In addition to advance weather monitoring, supervisors shall utilize one of the aforementioned weather services to review the day's forecasted temperature and humidity level prior to the start of work. Temperature and humidity levels will also be monitored on the work site throughout the day to evaluate the risk level for cold illness and determine when precautionary cold exposure prevention measures should be taken. Temperature will be monitored by means of dry bulb thermometer in degrees Fahrenheit.

3. Supervisors are to identify the jobs, tasks, and/or company employees who are at risk for cold exposure and conduct a risk assessment based on job classification

.IV. Cold Weather/Exposure Procedures:

Cox Energy Industrial Coatings, & Cleaning LLC shall implement the following Cold Weather/Exposure procedures when the temperature equals or exceeds 90 degrees Fahrenheit.

1. A supervisor, or a qualified designee shall directly observe employees for signs and symptoms of cold illness. Each supervisor, or qualified designee shall be responsible for observing no more than 20 employees.

2. If impractical to directly observe employees, a mandatory buddy system shall be implemented or regular communication with employees working solo shall be implemented by either radio or cellular phone or other effective observation such as periodic checks.

3. Employees shall be observed for symptoms of cold illness.

4. Cox Energy Industrial Coatings, & Cleaning LLC shall designate 1 or more employees to call for emergency medical procedures and will allow any employees to call for emergency services when a designated person is not available.

5. Cox Energy Industrial Coatings, & Cleaning LLC shall closely supervise new employees for the first 14 days of employment unless the new employee indicates at the time of hire that they have been doing similar work for at least 10 of the past 30 days and for more than 4 hours per day.

6. Cox Energy Industrial Coatings, & Cleaning LLC will provide a pre-shift meeting during periods of cold weather to remind employees:

- a. of the company's cold weather hazard/illness procedures.
- b. of their right to take warm-up rest periods when necessary.

V. Training:

Cox Energy Industrial Coatings, & Cleaning LLC will provide training to all supervisors, and affected employees, prior to their engagement in work that could result in exposure to risks, health hazards and symptoms of cold weather exposure. Training shall include:

1. An explanation of cold stress injuries and symptoms as follows

- a. Hypothermia occurs when body heat is lost at a rate quicker than it can be replaced.

Normally, hypothermia symptoms occur when the core body temperature decreases to approximately 95 degrees Fahrenheit. Symptoms of hypothermia include shivering, stomping of the feet to generate heat, loss of coordination, slurred speech, and skin that is pale and cold.

- b. Frostbite occurs when the skin freezes and loses water. Severe cases of frostbite may result in amputation and typically occur at temperatures less than 30 degrees Fahrenheit but can occur at higher temperatures when wind chill is considered. Extremities such as the hands and feet are particularly vulnerable to frostbite. Symptoms of frostbite include cold, tingling, stinging, or aching followed by numbness. The affected skin will turn red, then purple, then white, and is cold to the touch. Blistering may occur in severe cases of frostbite.

- c. Trench foot or immersion foot is caused by the foot or feet being immersed in cold water at temperatures below freezing for extended periods of time. Symptoms are similar to frostbite, but often less severe, and include tingling, itching, or burning sensations. Blisters may also form with trench foot.

2. Employees shall receive cold weather initial and annual training regarding the hazards of cold stress, the health effects, proper rewarming procedures, how to recognize symptoms of cold weather injuries, first aid techniques, protective clothing, the company's buddy system, procedures to follow in the event of vehicle breakdowns, and proper hydration and eating habits for cold weather work.

3. All employees affected by cold weather shall be trained on how to administer first aid in the event of cold-induced injuries or illnesses.

VI. Personal Protective Equipment (PPE)

Proper cold weather protection shall be worn by affected employees who work in cold, wet, and windy environments. Affected employees shall wear three layers of clothing, as follows: an inner layer of wool, silk, or synthetic to wick moisture away from the body; a middle layer of wool or synthetic to provide insulation, particularly when wet; and an outer layer of protection against wind and rain that allows proper ventilation. Employees shall be informed of the wetting effects of perspiration.

VII. Hydration and Breaks

The company requires proper hydration of affected employees to prevent cold-related injuries. The company will provide plenty of liquids to affected workers and discourage the use of caffeine and alcohol

that can lead to dehydration. The company will schedule work so that work is performed in the warmest part of the day when possible. Affected employees shall be encouraged to take frequent breaks and eat a high calorie diet to maintain energy.

VIII. Emergency Response Procedures:

All supervisors and management personnel of Cox Energy Industrial Coatings, & Cleaning LLC are required to take immediate action if an employee exhibits signs or symptoms of cold illness. Emergency response procedures will include but not be limited to the following actions:

1. Ensuring that effective communication by voice, observation, or electronic means are maintained so that employees at the high temperature work site can contact a supervisor or emergency medical service when necessary.
2. Cellphones, company radio, email and other electronic devices will be used for communication. If electronic devices are not reliable forms of communication, the Company shall develop alternative means of summoning emergency medical services.
3. Employees and supervisors will be trained to recognize symptoms of cold exposure, such as hypothermia, frostbite and trench foot as described in Section V.
4. Supervisors and employees will be taught first aid measures and how emergency services are to be provided to affected employees.
5. Employees exhibiting signs or symptoms will be monitored and shall not be left alone or sent home without being first offered onsite first aid and/or being provided with emergency medical service.
6. If deemed necessary, emergency medical services will be contacted, and employees will be transported to a place where they can be reached by emergency medical providers.
7. In emergency events, clear and precise directions to the work site will be provided to emergency responders.
8. In the event that a work site is in a difficult to find location, an employee will be sent to meet emergency medical services at the nearest landmark; and lead them to the work site.

IX. Acclimatization:

1. New employees and employees who have not previously worked in environments where the possibility that cold illness may occur will be given an opportunity for their bodies to gradually be exposed to cold. Employees will be given an opportunity to adapt to the cold by working in the cold for at least 2 hours a day, between 4 to 14 days.
2. Cox Energy Industrial Coatings, & Cleaning LLC shall also monitor employees during cold weather. Monitoring can be done by either the supervisor or by use of the buddy system.

3. Cox Energy Industrial Coatings, & Cleaning LLC shall stress to all new employees of the importance of immediately reporting to their supervisor symptoms and signs of cold exposure in themselves or in co-workers.

4. Physical factors that contribute to cold-related illness should be taken into consideration before performing a task. The most common physical factors that can contribute to cold related illness are type of work, level of physical activity and duration, and clothing color, weight and breathability.

42. GAS HAZARD EXPOSURE POLICY

Cox Energy, Industrial & Coatings, & Cleaning LLC

Gas Hazard Exposure Policy

I. Overview:

1. Cox Energy, Industrial & Coatings, & Cleaning LLC have the potential to be exposed to various gases during their work activities involving gas transmission facilities such as tanks, pipelines, and well heads. Potential exposures to gases such as Hydrogen Sulfide, Benzene, and Butadiene are covered in other of our employee Company safety procedures.
2. Natural Gas and Carbon Monoxide are two potential exposures that will be covered in this policy along with general guidelines for all potential hazardous gas exposures.
3. Gas hazard awareness training must be provided before initial assignment and annually thereafter.
4. Employees shall be aware of the client's contingency plan provisions including evacuation routes and alarms. Employees should participate in emergency evacuation drills and practice rescue procedures.

II. Natural Gas:

1. Natural Gas contains methane (also known as swamp gas or marsh gas), which is a hydrocarbon. Methane occurs naturally in the earth's crust and is also formed by decaying organic matter such as manure or sewage. Natural gas has no odor; mercaptans (which smell like rotten eggs) are added in low concentrations so that leaks can be detected. Natural gas is highly flammable and will spontaneously combust if there is a source of ignition. Natural gas becomes a liquid at - 120 degrees Celsius or 248 degrees Fahrenheit and is called LNG (liquefied natural gas).

2. Health Effects:

- a. Skin: Exposure to compressed or liquid forms can result in frostbite. Symptoms include a pale or blanched appearance to skin, numbness and blisters.
- b. Inhalation: A natural gas leak in an outdoor environment is usually not

concentrated enough to cause symptoms. A leak into a small-enclosed space can result in a lack of oxygen in the air and symptoms of hypoxia. These include headache, decreased vision, fatigue, shortness of breath and loss of consciousness.

c. Toxicity: Considered a simple asphyxiant, which means it displaces oxygen from the air. If there is a leak into a small-enclosed space the resulting lack of oxygen may cause symptoms of hypoxia. Incomplete combustion of natural gas can produce carbon monoxide.

d. A reduction in the amount of oxygen in the air causes gas leak symptoms. These can include: breathing difficulties, dizziness, [fatigue](#) or drowsiness, feeling lightheaded, flu-like symptoms, [headaches](#), irritation to the eyes and throat, mood changes, including [depression](#), nausea, nosebleeds, pains in the chest, pale skin or blistering, following direct contact with gas, reduced appetite, and ringing in the ears.

III. Preventative Measures:

1. If you smell gas or hear the flow of escaping gas, follow these steps immediately:

- Do not smoke, light matches, operate electrical switches, or use cellphones or telephones. Do not create any other source of ignition.
- Leave the area immediately and notify the authorities.

IV. Carbon Monoxide:

1. Carbon monoxide (CO) poisoning can lead to symptoms similar to those caused by a gas leak. Carbon monoxide is emitted when gas burns incompletely.

2. Exposure to CO can be fatal and requires emergency medical treatment.

3. Symptoms of carbon monoxide poisoning can include: abdominal pain, chest pain, dizziness, fatigue, headaches, loss of muscle control, nausea, and pink skin and bright red lips

V. Monitoring:

1. Each employee shall use a portable gas detector as required in all high gas hazard areas.

2. The gas monitor shall be calibrated per manufacturer's recommendations and contain a current calibration sticker on the monitor providing the date of calibration.

3. Bump tests are required to be completed at the beginning of each day the monitor is in use, per the requesting client and manufacturer's guidelines, to ensure the monitor is functioning correctly.

43. ERGONOMICS POLICY

Cox Energy, Industrial Coatings, & Cleaning

Ergonomics Policy

I. A Process for Protecting Workers:

Employers are responsible for providing a safe and healthy workplace for their workers. In the workplace, the number and severity of MSDs resulting from physical overexertion, and their associated costs, can be substantially reduced by applying ergonomic principles.

II. Prevention of Musculoskeletal Disorders in the Workplace:

1. Musculoskeletal disorders (MSDs) affect the muscles, nerves, blood vessels, ligaments and tendons. Workers in many different industries and occupations, such as construction work, can be exposed to risk factors at work, such as lifting heavy items, bending, reaching overhead, pushing and pulling heavy loads, working in awkward body postures and performing the same or similar tasks repetitively. Exposure to these known risk factors for MSDs increases a worker's risk of injury.

2. Work-related MSDs can be prevented. Ergonomics - fitting a job to a person - helps lessen muscle fatigue, increases productivity and reduces the number and severity of work-related MSDs.

3. Before manual lifting is performed, a hazard assessment must be completed. The assessment must consider, at a minimum, size, bulk, weight, and distance that the object(s) must be carried as well as whether vision is obscured while carrying and the walking surface and path where the object is to be carried.

III. Impact of MSDs in the Workplace:

Work-related MSDs are among the most frequently reported causes of lost or restricted work time. According to the Bureau of Labor Statistics (BLS) in 2018, MSD cases accounted for 33% of all worker injury and illness cases.

1. Implementing an ergonomic process is effective in reducing the risk of developing MSDs in high-risk industries such as construction. The following are important elements of an ergonomic process:

- a. Provide Management Support - A strong commitment by management is critical to the overall success of an ergonomic process. Management shall define clear goals and objectives for the ergonomic process, discuss them with their workers, assign responsibilities to designated staff members, and communicate clearly with the workforce.

b. **Involve Workers** - A participatory ergonomic approach, where workers are directly involved in worksite assessments, solution development and implementation are the essence of a successful ergonomic process. Workers can:

- i. Identify and provide important information about potential hazards in their workplaces.
- ii. Assist in the ergonomic process by voicing their concerns and suggestions for reducing exposure to risk factors and by evaluating the changes made as a result of an ergonomic assessment.

c. **Provide Training** - Training is an important element in the ergonomic process. It ensures that workers are aware of ergonomics and its benefits, become informed about ergonomics related concerns in the workplace, and understand the importance of reporting early symptoms of MSDs.

- i. Training is required for all affected employees and shall include general principles of ergonomics, the hazards of improper lifting, proper lifting techniques, procedures for reporting hazardous conditions, procedures for early reporting of injuries, and job specific training and controls. Additionally, job specific training shall be given on safe lifting and work practices, potential hazards, and controls.
- ii. Where use of lifting equipment is impractical or not possible, two-man lifts shall be used.

d. **Identify Problems** - An important step in the ergonomic process is to identify and assess ergonomic problems in the workplace before they result in MSDs. The company shall perform incident investigations and root causes analyses when company workers sustain injuries related to manual lifting. The findings of the investigation and corrective actions shall be incorporated into safe work processes to prevent future injuries. Investigations must be documented.

e. **Encourage Early Reporting of MSD Symptoms** - Early reporting can accelerate the job assessment and improvement process, helping to prevent or reduce the progression of symptoms, the development of serious injuries, and subsequent lost-time claims.

f. **Implement** - There are many possible solutions that can be implemented to reduce, control or eliminate workplace MSDs.

- i. Manual lifting equipment such as dollies, hand trucks, lift assist devices, jacks, carts, hoists and other suitable engineering controls where appropriate and

practical must be provided for all affected employees. Other engineering controls such as conveyors, lift tables, and workstation design should be considered.

- ii. Manual lifting equipment should be used instead of manual lifting where possible. Supervisors should enforce the use of lifting equipment.

g. Evaluate Progress - Established evaluation and corrective action procedures are required to periodically assess the effectiveness of the ergonomic process and to ensure its continuous improvement and long-term success.

- i. As an ergonomic process is first developing, assessments should include determining whether goals set for the ergonomic process have been met and determining the success of the implemented ergonomic solutions.
- ii. Supervision shall periodically monitor employees for improper manual lifting techniques and provide positive corrections to prevent injuries. When new operations are planned, proper engineering controls such as lift assists, mechanical lifting devices, and other suitable engineering controls shall be evaluated to engineer out the hazards caused by manual lifting.
- iii. Company management shall evaluate work conditions, technologies, and procedures to assess the risk to workers of sustaining manual lifting injuries and incorporate correct measures in the design phase of the work.

Note: An ergonomic process uses the principles of a safety and health program to address MSD hazards. Such a process should be viewed as an ongoing function that is incorporated into daily operations, rather than as an individual project.

44. FATIGUE MANAGEMENT POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

FATIGUE MANAGEMENT POLICY:

I. PURPOSE:

The purpose of this policy is to establish the requirements for recognizing the symptoms of and managing fatigue. It is intended that this policy will reduce the risk of fatigue-related injuries and incidents in the workplace.

II. POLICY STATEMENT:

1. Cox Energy, Industrial Coatings, & Cleaning LLC is committed to providing and maintaining safe systems of work for all its workers, including those whose work involves shifts work, extended hours or on-call arrangements.

2. Cox Energy, Industrial Coatings, & Cleaning LLC operations are sometimes undertaken outside ordinary working hours. Activities such as painting/coating of tanks or various cleaning projects may involve shift work, extended hours and on-call arrangements. These working arrangements may contribute to fatigue if not managed appropriately. Cox Energy, Industrial Coatings, & Cleaning LLC will set work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep, and increase mental fitness in an effort to control employee turnover and absenteeism.

3. Initial and annual training shall be provided on how to recognize fatigue, how to control fatigue through appropriate work and personal habits, and reporting of fatigue to supervision.

4. Work tasks to control fatigue shall be analyzed and evaluated periodically.

III. SCOPE AND COVERAGE:

1. This policy applies to all staff, especially those whose work involves shift work, extended hours and on-call arrangements.

2. The Cox Energy, Industrial Coating, & Cleaning LLC program address the roles and responsibilities of employees in safety critical positions to report fatigue/tiredness and lack of mental acuity to supervision; as well as supervisory personnel to make safety critical decisions and take appropriate actions to prevent loss and to prevent injuries. (See Section V)

IV. DEFINITIONS:

1. Open Door Policy: The Employee Assistance Program (EAP) provides confidential counselling and support to staff and their families on a range of issues, such as alcohol and drug related problems, emotional stress, and relationship difficulties. It should not be used for counselling relating to an injury that is the subject of a worker's compensation claim or as post-incident counselling following a traumatic incident in the workplace. Refer to the Open-Door Policy for further details.

2. Extended hours: Hours that are an extension of the standard working week, as a result of overtime, on-call arrangements or secondary employment.

3. Fatigue: A mental or physical exhaustion that prevents a person from functionally normally. In the work environment this can mean that a person is also unable to function safely, and it can impair safe work performance. Fatigue can be caused by both work and non-work-related factors. Non-work factors include family responsibilities, social activities, health issues—such as sleep disorders—study commitments and sporting commitments. Work factors include shift work—especially night shift— and working extended hours. While everyone doesn't respond to fatigue in the same way, fatigue can cause reduced concentration, impaired co-ordination, compromised judgement and slower reaction times, which ultimately increase the risk of incidents and injuries. It has many causes but is usually related to inadequate restorative sleep.

4. Restorative sleep: Restorative sleep is the process by which the body overcomes fatigue. It involves cycles of deep sleep that allow a person to recuperate and wake up refreshed.

5. Shift work: Work performed outside the hours between 0600 and 1800 hours, Monday to Friday.

6. Sleep cycles: Sleep cycles are determined by the body's natural biological rhythms (also known as circadian rhythms or the 'body clock'), which are repeated every 24 hours. As well as regulating sleep cycles, biological rhythms also regulate body temperature, digestion and hormone levels.

7. Ergonomic equipment: shall be used to improve workstation conditions such as anti-fatigue mats for standing, lift assist devices for repetitive lifting, proper lighting and control of temperature, and other ergonomic devices as deemed appropriate.

V. TRAINING

All effected employees shall be trained on the symptoms of fatigue, the appropriate controls the company utilizes (such as safe work practices) and personal habits to limit worker fatigue, and how to report fatigue to company management. Effected employees shall be trained upon initial assignment and annually thereafter.

VI. RESPONSIBILITIES:

Managers and workers have a responsibility to ensure that fatigue does not impact the safety, health and well-being of themselves and others.

1. Managers and supervisors are responsible for:

- a. Applying risk management in consultation with staff and in accordance with the fatigue risk management system.
- b. Ensuring systems of work that minimize the risk of fatigue—for example, reasonable rosters, reasonable overtime practices and adequate recuperation between shifts.
- c. Providing opportunities for workers to obtain adequate rest from work.
- d. Monitoring workloads, work patterns and rostering arrangements to ensure workers are not placed at risk from fatigue.
- e. Consulting with workers when introducing shift work or new rostering systems.
- f. Providing information, instruction and training about risks to health, safety or welfare of workers involved with shift work, extended hours and on-call arrangements.
- g. Ensuring workers performing shift work are properly supervised and that tasks are undertaken safely.
- h. Ensure workers know the procedures for reporting both work and non-work-related fatigue issues.
- i. Ensure that appropriate limits on work hours and control rotation schedules are set to limit the fatigue of affected employees and allow for suitable rest periods.

j. Ensure that affected employees' workstations and equipment are evaluated ergonomically to ensure that work tasks are designed to control worker fatigue and increase mental alertness.

k. Ensure that affected employees' work tasks are periodically evaluate for evidence of increasing fatigue factors and to develop corrective actions to lessen worker fatigue.

2. Employees are responsible for:

a. Participating in risk management processes.

b. Using time off from work to recuperate in order to be fit and able for the next shift.

c. Participating in education and training in order to gain an understanding of fatigue.

d. Avoiding behaviours and practices that contribute to fatigue and which could place themselves and others at risk—for example, secondary employment or not using time off work to recuperate.

e. Recognising signs of fatigue that could place the health, safety and well-being of themselves or others at risk and reporting this to their manager or supervisor.

f. Employees shall not chronically use over-the-counter or prescription drugs to increase mental alertness. Employees should be discouraged from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off.

3. Policy Violations:

Violations of this policy and/or any of its associated procedures may result in disciplinary action being initiated in accordance with the Cox Energy, Industrial Coatings, & Cleaning LLC Discipline Policy.

45. INJURY/ILLNESS RECORDKEEPING POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

INJURY/ILLNESS RECORDKEEPING

1. Cox Energy, Industrial Coatings & Cleaning, LLC and its employees will fully integrate Occupational Safety and Health Administration (OSHA) excellence into its business and related operations planning and decision making to achieve superior health and safety performance. Simply stated: Safe production is the Company's standard policy. The Company shall manage its operations in accordance with OSHA principles and beliefs, in a manner that helps to control occupational safety and health risks, protects the environment, while fully complying with applicable laws and regulations.

2. Cox Energy, Industrial Coatings & Cleaning, LLC is dedicated to achieving a zero injury, zero incident workplace for its employees, sub-contractor employees, and the public. Safety is an obligation for all employees and sub-contractor employees, and is a condition for employment. Of foremost concern is the personal suffering of employees, relatives, and the public, that can result from incidents due to unsafe conditions and practices in the workplace.

3. All federal, state, and local safety, health, and environmental regulations applicable to the work activities are to be enforced. All requirements of this program and of any sub-contractor's safety program (with the most stringent applying) are to be enforced, but at no time, and in no way is the sub-contractor relieved of their duty to ensure due diligence in terms of regulatory compliance or adopting recognized best practices for their trade/scope of work. Variance from this program, while expected, must be communicated to and approved by the site Cox Energy, Industrial Coatings & Cleaning, LLC Site Project Superintendent or Safety Manager. Those variances and implementations of best practices may become site policy in future revisions of this program, as continuous improvement is necessary in ensuring the safest conditions possible for our employees. In situations or for all scopes of work not addressed in this plan, industry best practice(s) will be identified and followed.

4. Injury/Illness Recordkeeping:

a. The purpose of the OSHA rule (part 1904) is to require employers to record and report work-related fatalities, injuries, and illnesses.

b. Recording or reporting a work-related injury, illness, or fatality does not mean that the employer or employee was at fault, that an OSHA rule has been violated, or that the employee is eligible for workers' compensation or other benefits.

c. Cox Energy, Industrial Coatings, & Cleaning is required to keep records of fatalities, injuries, and illnesses must record each fatality, injury and illness that:

(i) Is work-related; and

(ii) Is a new case; and

(iii) Meets one or more of the general recording criteria.

d. Each recordable injury or illness must be entered on an OSHA 300 Log and 301 Incident Report, or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

e. A company executive must certify that he or she has examined the OSHA 300 Log and when found to be correct will sign the OSHA 300A Summary.

f. A copy of the annual summary must be posted in each establishment in a conspicuous place or places where notices to employees are customarily posted. You must ensure that the posted annual summary is not altered, defaced or covered by other material.

g. The annual summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place through April 30th.

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

46. ASBESTOS ABATEMENT POLICY

Cox Energy, Industrial Coating, & Cleaning LLC

Asbestos Abatement Policy

I. POLICY STATEMENT:

Cox Energy, Industrial Coating, & Cleaning LLC. (CEICC) and its employees shall fully integrate Occupational Safety and Health Administration (OSHA) excellence into its business and related operations, planning, and decision making to achieve superior health and safety performance. Simply stated: Safe production, quality of work, and efficient operations are the Company's standards. Consequently, CEICC shall manage its operations in accordance with our OSHA principles and beliefs, in a manner that helps to control occupational safety and health risks, protects the environment, while fully complying with applicable laws and regulations.

II. POTENTIAL ASBESTOS CONTAINING MATERIAL (PACM):

1. The host facility is required by 29 CFR 1926.1000(k) to identify all locations of Asbestos Containing Material (ACM) and/or Potential Asbestos Containing Material (PACM) at/or greater than 1%, the type of asbestos present, and the amount of asbestos that would need to be abated by our Company. However, our employees are trained in the recognition of suspect materials. Types of these materials include: heat-resistant clothing, automotive brake and clutch linings, and a variety of building materials including insulation, soundproofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet, and fire-resistant drywall. Asbestos can also be present in pipe and boiler insulation materials, pipeline wrap and in sprayed-on materials located on beams, in crawlspaces, and between walls.

2. Cox Energy, Industrial Coating, & Cleaning LLC is licensed in the State of WV to perform asbestos abatement work, (WV Asbestos Contractor Number; AC002839).

3. All asbestos workers employed by Cox Energy, Industrial Coating, & Cleaning LLC. shall be trained before initial assignment to abatement projects and shall undergo annual refresher training consistent with the requirements of 29 CFR 1916.1101.

4. Employee training shall consist of both classroom and hands-on training from an approved training provider consisting of but not limited to the following elements: Methods of recognizing asbestos, health effects of asbestos,

respirator training, requirements for posting signs, and hands on training for acceptable removal methods.

5. All required PPE shall be worn by all employees who enter a regulated area, including coveralls or similar full-body work clothing, gloves, head coverings and foot coverings, face shields, vented goggles, or other appropriate protective equipment which complies with OSHA 1910.133, and respirators. CEICC shall provide PPE to its employees.

Respirators must be used during periods necessary to install or implement feasible engineering and work-practice controls, work operations, such as maintenance and repair activities, for which engineering and work-practice controls are not feasible, work operations for which feasible engineering and work-practice controls are not yet sufficient to reduce employee exposure to or below the TWA and/or excursion limit, emergencies. A respirator may not be required following collection of air monitoring data by a Competent person which demonstrates that exposures are below OSHA's Permissible Exposure Limit. A negative exposure assessment performed within the previous 12 months which states the asbestos containing material removal projects are and will be maintained below the permissible exposure limit will eliminate the respirator PPE requirement.

6. A competent person (licensed Asbestos Supervisor) shall make frequent and regular inspections of the job site, materials, and equipment. The competent person must be capable of performing or supervising the regulated area and have authorization to take prompt corrective actions to eliminate a hazard.

7. Cox Energy, Industrial Coating, & Cleaning LLC's asbestos abatement workers within the regulated or designated area shall not be allowed to eat, drink or smoke. These activities must be conducted outside of these areas to prevent accidental inhalation or ingestion of airborne asbestos fibers.

8. In addition to establishing a demarcated perimeter around the regulated area, warning signs shall be posted at all approaches to and around the regulated area in sufficient numbers to identify the hazard and to ensure that an employee may read the signs and take necessary protective steps before entering the area. The warning signs shall be as designated in the 29 CFR 1926.1101 OSHA Regulations.

9. 6 mil thick polyethylene sheeting must be placed under the pipeline abatement area at all times during coating removal to collect any debris generated.

10. The asbestos material shall be adequately wetted with an amended

water solution using a low-pressure garden style sprayer or other similar device to prevent any visible dust emissions during the abatement removal process. The use of dye in the amended water solution is recommended to ensure adequate wetting of the asbestos material.

11. A utility knife or similar tool may be used to cut the asbestos containing material into uniform squares. The use of high-speed cutting tools, (electric grinders with cutting discs, reciprocating saws, circular saws, etc.) or compressed air are not allowed. These work practices are prohibited by 29 CFR 1926.1101, OSHA's Asbestos Construction standard and shall not be performed under any circumstances, as doing so greatly increases the risk of airborne asbestos fiber exposure. The objective of this activity is to prevent tearing or crumbling of the asbestos containing material and to remove it intact in a non-friable condition.

12. The adequately wet intact asbestos material pieces shall be placed into labeled asbestos waste bags. These bags shall be airtight, puncture resistant, and labeled accordingly. These bags should only be half filled and closed at the end by a "gooseneck" method and sealed with duct tape. The use of dye in the amended water to adequately wet the asbestos containing material is recommended to ensure there is sufficient visible water in the disposal bag.

13. Vacuum cleaners equipped with HEPA filters shall be used to collect all debris generated by the asbestos material removal and to decontaminate disposable clothing of workers and supervisors in the designated area upon exiting the regulated area.

14. Sealed, secured and labeled containers of ACM waste shall be removed and transported to a pre-arranged disposal location, designated by the host facility, as soon as technically feasible. Vehicles used for transport shall be labeled properly during loading, transportation, and unloading. A waste shipment record shall be maintained.

15. Signs and labels shall identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that asbestos containing material (ACM) and/or presumed asbestos containing material (PACM) that is abated does not exceed the OSHA Permissible Exposure Limits.

16. If Cox Energy, Industrial Coating, & Cleaning LLC's employees working immediately adjacent to a Class I asbestos jobs are exposed to asbestos due to the inadequate containment of such job, Cox Energy, Industrial Coating, Cleaning LLC shall remove the employees from the area until the enclosure breach is repaired and an exposure assessment is performed to ensure no further potential

exposures can occur.

17. Class I and II operations. CEICC shall conduct daily monitoring that is representative of the exposure of each employee who is assigned to work within a regulated area who is performing Class I or II work, unless the employer has made a negative exposure assessment for the entire operation.

For all operations under the standard other than Class I and II operations, CEICC shall conduct periodic monitoring of all work where exposures are expected to exceed a PEL, at intervals sufficient to document the validity of the exposure prediction.

18. CEICC shall, as soon as possible but no later than 5 working days after receipt of the results of any monitoring performed under this section, notify each affected employee of these results either individually in writing or by posting the results in an appropriate location that is accessible to employees.

III. HEALTH EFFECTS:

1. Disturbing asbestos minerals or other asbestos-containing materials can release tiny asbestos fibers, too small to see, into the air. Workers and others who breathed asbestos fibers over many years have developed asbestos-related diseases, including asbestosis, pleural disease, lung cancer, and mesothelioma. Some of these diseases can be serious or even fatal.

2. The risk of disease depends on various factors:

- How much asbestos is in the air,
- How often and for how long exposure occurs,
- How much time has passed since exposure began,
- Whether the person already has lung or breathing conditions and;
- Whether the person smokes tobacco.

3. After exposure occurs, asbestos can't be removed from the lungs. Preventing further harm to the respiratory system can lower the chances of disease developing or slow down progress of an existing disease. Preventative care guidelines related to asbestos exposure include:

- Having regular medical exams

- Getting regular vaccinations against flu and pneumococcal pneumonia
- Quitting smoking; Studies have shown that asbestos exposure and smoking **leads to a risk of dying of lung cancer** more than 28 times higher than nonsmokers. While smoking causes an increased lung cancer risk in asbestos workers, studies have shown that after quitting smoking there is a significant drop in incidence rate.
- Avoiding further asbestos exposure

47. SAFE RETURN TO WORK POLICY

Cox Energy, Industrial Coatings & Cleaning, LLC

Safe Return to Work Policy

Statement of Policy:

The purpose of this policy is to determine if the employees of Cox Energy, Industrial Coatings & Cleaning, LLC are medically and physically qualified to perform his/her job duties under working conditions. Safe Return to Work assessments shall be performed as a pre-employment requirement, after an illness or injury, or as a condition of job transfer.

Section I.

1. The employee shall, as a condition of employment, undergo a Fitness to Work examination by a licensed health care professional. The medical professional shall return a report of;
 - a. Fit for duty – no restrictions
 - b. Fit for duty – subject to work restrictions/modifications
 - c. Unfit for duty
2. Persons determined to be fit for duty – no restrictions, are deemed medically and physically qualified to perform all assigned job duties.
3. Persons determined to be fit for duty – subject to work restrictions/modifications, shall be only assigned duties that take the work restrictions/modifications into consideration. Employees shall be informed by communicating the company policy via a safety meeting or toolbox talk, reviewing the policy as part of the new employee orientation, and/or posting the policy in a conspicuous location, etc.
4. Persons deemed to be unfit for duty shall not be assigned to the job site.
5. Local health care providers shall be advised that Cox Energy, Industrial Coatings & Cleaning, LLC provides modified work to injured employees, whenever practicable. This may be accomplished by proactively making arrangements with clinics that specialize in Occupational Health, and recommending injured employees seek treatment there. If/when this is not practicable, a standard letter shall be drafted that outlines the company's modified

work opportunities. Injured employees should take this letter with them when they visit their health care provider.

6. Cox Energy, Industrial Coatings & Cleaning, LLC shall ensure that modified work being offered is consistent with the medical restrictions listed by the health care provider.

Employees must ensure that changes in the scope of the modified work must adhere to the medical restrictions. Modified work is temporary and should be managed with a goal to return the individual to full time work as soon as deemed medically fit.

7. A list of jobs available to be performed for employees on modified duty shall be maintained. All jobs shall be assessed to determine which jobs can be performed by persons working under specific restrictions. It is recommended that a Physical Demands Analysis (PDA) be prepared for each of these jobs to ensure employees are placed accordingly.

8. Supervisors shall be made aware of the restrictions to ensure the modified work meets the physician's orders.

9. Medical records shall be kept by the employer strictly on a need-to-know basis. The records shall be kept in a locked file. If the injury is of an OSHA Recordable nature and is considered confidential, no employee identification shall be recorded on the OSHA 300 log.

10. Cox Energy, Industrial Coatings & Cleaning, LLC shall maintain written records of all incident details. This will help the company to recall information about the circumstances of the incident at a later time, and will demonstrate due diligence. Incident investigation records shall be maintained. Records shall be kept of communications with the injured employee regarding modified work. Workers Compensation and medical records, where applicable, shall also be maintained.

Section II.

1. An employee's abuse of drugs and alcohol jeopardizes the safety of co-workers and the public and damages the reputation of the Company and its employees. When performing work duties, employees have a responsibility to ensure their on-the-job performance of these duties is not impaired by using drugs or alcohol, regardless of whether such use is legal or illegal. To promote on-the-job safety, Cox Energy, Industrial Coatings, & Cleaning LLC conducts mandatory drug and alcohol testing of all employees who perform safety-sensitive functions. These individuals are referred to herein as covered personnel.

Guidelines:

2. All managers and officials of the Company must attend at least two (2) hours of training on the signs and symptoms of drug and alcohol abuse.

3. Prior Job Drug and Alcohol History: The Company shall obtain the employment history of a covered applicant. A written release of the covered applicant's drug and alcohol history is a requirement of employment. The previous employer is required to release this information upon request and upon receiving the written request. A newly covered employee cannot work beyond fourteen (14) days without this drug and alcohol history, unless the record of the previous history cannot be obtained.

4. Conditions Requiring Testing: Covered personnel are designated for drug and alcohol testing under any of the following conditions:

a. Pre-Employment: Any individual applying for a covered position will be tested before employment, post-accident, at random, and for cause, (reasonable suspicion).

b. Random:

1. Random drug testing shall be conducted each year at a rate to equal at least 50% of safety-sensitive employees

2. Random alcohol testing shall be conducted each year at a rate to equal at least 25% of safety-sensitive employees.

c. Reasonable Suspicion:

5. Employee's activities, behaviors and job performance shall be monitored to determine if the employee should be removed from the work site. If a manager or authorized Company official has cause to believe or has reasonable suspicion that an employee's use of legal or illegal substances is adversely affecting performance or fitness for duty based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech, or body odors of the employee, these findings and observations are to be documented on a Behavior/Incident Documentation form and a drug and/or alcohol test is required. The employee shall be relieved of duties until the results of the alcohol/drug testing have been received.

6. Annual or Biennial: Drug testing is performed on covered personnel as part of annual or biennial physical examinations where the examinations are required by law, regulation, or Company policy.

7. Post-Accident: Recordable accidents shall require testing for alcohol and controlled substances following an occurrence for any employee:

a. Alcohol testing must be administered within two (2) hours and drug testing within thirty-two (32) hours of an accident. Covered personnel are prohibited from using alcohol or controlled substances following an accident until they have been tested,

8. Return-to-Duty and Follow-Up: A covered employee who is allowed to return to performing safety-sensitive duties after undergoing a Company approved substance abuse counseling/treatment program must submit to at least six (6) unannounced tests in the first twelve (12) months after returning to duty. Follow-up testing may be extended for up to sixty (60) months following return to duty.

9. Testing procedures: Covered personnel are subject to alcohol screening and a five-panel drug screen in accordance with and conforming to the stipulations set forth in DOT drug and alcohol testing procedure rule, 49 CFR Part 40.

10. Covered personnel who voluntarily request assistance for substance abuse are relieved of duties, but may be retained as employees in non-safety sensitive positions or placed on medical leave or leave without pay while undergoing treatment. They must also undergo substance abuse counseling/treatment approved by the Human Resources Department. The cost of any substance abuse treatment and rehabilitation is the responsibility of the employee involved.

11. Failure to comply with the Company's Drug and Alcohol Testing policies will result in disciplinary action up to and including termination.

Section III.

1. Employees shall report all medications they are taking. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor. A copy of the current medical prescription shall be made available for review by management

2. Employees shall be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers. Employees are responsible for self-reporting of problems which will affect the performance of their assigned job duties.

48. PANDEMIC PREPAREDNESS POLICY

Cox Energy, Industrial Coating & Cleaning, LLC

Pandemic Preparedness Policy

Scope:

Cox Energy, Industrial Coating & Cleaning, LLC is committed to ensuring a safe, healthy environment for all its employees, residents, investors and visitors. In an effort to support public health officials in preventing the spread of contagious disease, Cox Energy, Industrial Coating & Cleaning LLC has developed this pandemic disease/virus containment plan and has appointed a coordinator for the implementation of the plan. This plan includes following all federal, state, and local recommendations for virus control and contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals.

Section I

1. Cox Energy, Industrial Coating & Cleaning, LLC will work with local public health officials in its various work areas in order to stay informed and monitor the need to respond to potential and/or real pandemic outbreaks.
2. Illnesses such as influenza (the flu) and colds are caused by viruses that infect the nose, throat and lungs. The flu and colds usually spread from person to person when an infected person coughs or sneezes. To help stop the spread of germs;
 - (a) Cover your mouth and nose when you sneeze or cough.
 - (b) Cough or sneeze into a tissue and then throw it away. Cough or sneeze into your sleeve if tissues are unavailable. Wash your hands every time you cough or sneeze.
3. Avoid touching your eyes, nose or mouth. Germs are often spread when a person touches something that is contaminated with germs and then touches his or her eyes, nose or mouth. Germs can live for a long time (some can live for two hours or up to several days) on surfaces like doorknobs, desks and tables.
4. Clean your hands often. When available, wash your hands with soap and hot water, then rub your hands vigorously together and scrub all skin surfaces. Wash for 15 to 20 seconds with hot water and anti-bacterial soap. It is the soap combined with the scrubbing action that helps dislodge and remove germs. When soap and water are not available,

alcohol-based disposable hand wipes or gel sanitizers may be used. If using a gel, rub the gel in your hands until they are dry. The gel doesn't need water to work; the alcohol in the gel kills germs that cause colds and the flu. Keep antibacterial gel at your desk and in your purse or briefcase or company vehicles and job-site locations. Antibacterial gel shall be provided for employees to use at all work locations.

5. Clean/Sanitize equipment often.

(a) Sanitizing wipes shall be provided in several areas throughout the work location where common use of equipment occurs; i.e., the conference room, mail room, reception area.

(b) Telephones, keyboards and other equipment should be wiped down prior to individual use. Clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) periodically and when visibly soiled. Work surfaces shall be cleaned frequently using approved disinfection cleaning products.

(c) Hand washing and use of hand sanitizers shall be encouraged by company supervision. Hand washing facilities, hand sanitizers, tissues, no touch trash cans, antibacterial hand soap and disposable towels should be provided by Cox Energy, Industrial Coating & Cleaning, LLC.

6. **Stay home when you are sick and check with a health care provider when needed.** When you are sick or have flu symptoms, stay home, get plenty of rest and check with a health care provider as needed. Remember;” keeping your distance” from others may protect them from getting sick. Common symptoms of the flu include:

- Fever (usually high)
- Headache
- Extreme tiredness
- Cough
- Sore throat
- Runny or stuffy nose
- Muscle aches

- Nausea, vomiting and diarrhea

7. Employees are reminded that the company sponsors annual influenza vaccinations during the fall. Employees are also reminded that other vaccinations such as pneumonia shots are available. The company also provides paid time off (vacation/sick leave) to cover absences due to influenza. Employees shall be encouraged to obtain appropriate immunizations to help avoid disease. Granting time off work to obtain the appropriate vaccine shall be considered as necessary when vaccines become available in the community.

Section II.

1. Each work location is responsible to develop a communication plan for the purpose notifying their employees when that location is closed. Key contacts, a chain of communications and contact numbers for employees, and processes for tracking business and employee's status shall be developed. This communication plan must be reviewed and updated annually and a copy submitted to Human Resources. The work location Superintendent shall be the designated workplace coordinator for the pandemic plan.

2. Corporate or work location offices will be closed when an order or recommendation by public health officials has been made or the President/CEO has determined it is necessary. At that time, the communication plan will be initiated as outlined as follows;

(a) Supervisors will call their direct reports as assigned. Those colleagues will in turn contact the rest of the staff as outlined in the chart. (See Corporate Staff Phone Tree).

3. Cox Energy, Industrial Coating & Cleaning, LLC realizes that employees with contagious temporary illnesses, such as influenza, colds and other viruses, need to continue with normal life activities, including working. In deciding whether an employee with an apparently short-term contagious illness may continue to work, the company considers several factors. The employee must be able to perform normal job duties and meet regular performance standards and their continued presence must pose no risk to the health of the employee, other employees and customers. If such risks are present, the company will ask the employee to leave work/stay home until the threat of infection is gone. Supervisors are encouraged to remind employees that the company provides paid leave to cover absences due to contagious temporary illnesses. All employees are urged to contact Human Resources regarding any questions about the possible contagious nature of another

employee's temporary illness. Disclosure of confidential information by any employee about another employee's protected health information is forbidden.

4. Employees that are required to care for family members that are affected by the pandemic fall under these same guidelines.

5. All employees shall be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease, and when it is appropriate to return to work after illness. Disease containment plans and expectations shall be shared with employees. Communicating information with non-English speaking employees or those with disabilities must be considered.

6. It is expected that approximately 20% to 80% of the workforce can be absent for an extended period of time during a pandemic due to personal illness, family member illness, fear, community containment, quarantines, school and/or business closures and public transportation closures. Therefore, it is important to identify individuals and services essential to maintaining continuing operations.

7. Each work location superintendent is responsible for identifying those essential individuals and services by location and function that are required to continue business operations during a pandemic. Business operations can include managing internal staff, servicing clients, and managing products and services received from suppliers, vendors and subcontractors. A procedure developed to notify key contacts including both customers and suppliers in the event of an outbreak has impacted your job site's ability to perform required services shall be activated. This procedure must also include notification to customers and suppliers of how and when normal operations resume. Business continuity plans have been prepared so that if significant absenteeism or changes in business practices are required, business operations can be effectively maintained. Tele-commuting or other work-at-home strategies have been developed. In the interim, only essential operations shall be performed.

8. In the event of a flu pandemic or other communicable disease situation, Cox Energy, Industrial Coating & Cleaning, LLC **shall** implement social distancing guidelines to minimize the spread of the influenza and other communicable diseases among the staff and/or employees.

9. During the work day, employees are requested to:

(a) Avoid meeting people face-to-face. Employees are encouraged to use the telephone, video conferencing and the Internet to conduct business as much as possible, even when participants are in the same building. Residents should also be encouraged to communicate by phone or Internet.

(b) If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room and sit at least six feet from each other if possible; avoid person-to-person contact such as shaking hands.

(c) Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops and training sessions. Conduct training via webinar.

(d) Do not congregate in break or conference rooms, pantries, copier rooms or other areas where people socialize. Social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings shall be practiced.

(e) Bring lunch and eat at your desk or away from others (avoid lunchrooms and crowded restaurants).

(f) Encourage employees and others to request information via phone and e-mail in order to minimize person-to-person contact. Have the materials and information ready for fast pick-up or delivery and encourage residents to use the drop box for returning information.

(g) Practice “social distancing” which is a separation of at least six (6) feet from other employees in the work area.

(h) Employees are encouraged to wear at a minimum a P-100 filtering face mask when they are on a multi-employer work site.

(i) Flexible work policies shall be developed whenever possible. Workers shall be encouraged to stay at home when ill, when having to care for ill family members, or when caring for children when schools close, without fear of reprisal.

Section III - Management Preparedness Checklist

1. Verify the Emergency Phone Listing is current with cellular numbers and home numbers of all employees, including the regional supervisor’s numbers. Include a contact person for staff and a central number for all employees to contact. Upon completion,

distribute to all employees and forward a copy to the regional supervisor's and corporate office.

2. The corporate office will compile an Emergency Reaction Team to assist employees and work locations in need after the company is affected by the pandemic.
3. Verify that the work locations and the corporate office emergency equipment are in good working order and supplies are adequate to last several days if necessary.
4. Office emergency equipment is to include batteries, flashlights, and battery powered radios, appropriate respiratory protective devices, hand sanitizer, sanitizing material for equipment, and appropriate nitrile gloves, (do not use latex),
5. Ensure emergency relief supplies are available and easily assessable. Supplies are to include first aid kits, blankets, can openers, batteries, canned food, bandages, plastic bags, unscented bleach, drinking cups, bottled water and other supplies as recommended by local public health officials or the CDC.
6. Request replenishment of any outstanding petty cash.
7. Know where the authorities will allow waste disposal until pick up is available.
8. Separate types of waste. Food products must be bagged and separate from all waste materials.
9. Give answering services the work locations manager's /supervisor's home and cell phone numbers.
10. Locate a local radio station with the appropriate news network system on a battery-powered radio. Stay informed of where outbreaks are occurring and listen for instructions for your area.
11. Fill all vehicles with fuel. In the event of loss of power, the gas pumps will not operate. Also have an emergency supply of fuel(s) on hand with mechanical pumps for distribution.

Section IV.

1. The plan and emergency communication strategies shall be periodically tested (for example annually) to ensure it is effective and workable. This test will include notification procedures, audits of available emergency supplies, and effectiveness of employee training.

2. Following a pandemic event, the person responsible for implementation of the plan shall identify learning opportunities and take action to implement any corrective actions.

49. COVID-19 PREPAREDNESS POLICY

Cox Energy, Industrial Coating & Cleaning, LLC

COVID – 19 Preparedness Procedure

I. Scope.

Cox Energy, Industrial Coating & Cleaning, LLC is committed to ensuring a safe, healthy environment for all its employees, residents, investors and visitors. In an effort to support public health officials in preventing the spread of contagious disease, Cox Energy, Industrial Coating & Cleaning LLC has developed this COVID-19 preparedness plan and has appointed a coordinator for the implementation of the plan. This plan includes following all federal, state, and local recommendations for virus control and contacting local health department and health care providers in advance and developing and implementing protocols.

II. Confirmation of No Symptoms Process and Daily Temperature Checks.

1. Cox Energy, Industrial Coating & Cleaning, LLC shall confirm that employees exhibit no symptoms of COVID – 19 prior to being allowed on any job site. COVID-19 affects different people in different ways. Infected people have had a wide range of symptoms reported – from mild symptoms to severe illness.

2. **Symptoms check.** Symptoms may appear 2-14 days after exposure to the virus. People with these symptoms may have COVID-19:

- a. Fever or chills
- b. Cough
- c. Shortness of breath or difficulty breathing
- d. Fatigue
- e. Muscle or body aches
- f. Headache

- g. New loss of taste or smell
- h. Sore throat
- i. Congestion or runny nose
- j. Nausea or vomiting
- k. Diarrhea

3. **Emergency signs.** Look for emergency warning signs for COVID-19. If someone is showing any of these signs, seek emergency medical care immediately:

- a. Trouble breathing
- b. Persistent pain or pressure in the chest
- c. New (unusual) confusion
- d. Inability to wake or stay awake
- e. Bluish lips or face

4. **Daily temperature checks and other diagnostic testing.** Cox Energy, Industrial Coating & Cleaning, LLC shall initiate daily temperature checks on all employees when they report for work. Diagnostic testing that involves saliva or nasal/oral cavity swabbing may also be used as the situation warrants. Additionally, personnel administering COVID-19 tests, in-person temperature checks, or other in-person health screening shall be protected from exposure to sources of SARS-CoV-2, including asymptomatic and pre-symptomatic workers who might be infected but not know it. Protection of screening and testing workers should incorporate standard and appropriate transmission-based precautions and should follow the hierarchy of controls which include; appropriate engineering, and administrative controls, safe work practices, and PPE as outlined by the CDC.

5. The CDC describes five situations in which testing might be appropriate, whether done by a health care professional or the employer.

- a. **Testing employees who show symptoms.** If, for example, an employee is found to have a fever during a daily temperature check at work, that employee should immediately be isolated from others, sent home or to a health care

facility, and be tested for the coronavirus. Any employee who might have been infected by that person should also be sent home to quarantine pending the test results.

- b. Testing employees who have been exposed to the virus.** If an employee has been exposed to a confirmed COVID-19 case, he or she should be quarantined immediately and tested for the virus. Testing should be done several days after exposure because the virus might not be detected immediately, the agency advised. The employee should remain quarantined at least until test results are received.
- c. Testing all employees each shift or at regular intervals.** A mass testing approach might be appropriate in areas where there is high transmission and workers are in close contact with each other, the CDC said. However, "before testing a large proportion of asymptomatic workers without known or suspected exposure, employers are encouraged to have a plan in place for how they will modify operations based on test results and manage a higher risk of false positive results in a low prevalence population."
- d. Testing once-infected employees before they return to work.** Employers can choose to have recovered employees tested before they return to work, the CDC said, but tests may continue to find traces of the virus even after the person has recovered. The agency seemed to prefer a time-based approach to ending quarantine, such as 14 days from exposure, over a testing requirement. "Most people with COVID-19 have mild illness, can recover at home without medical care, and can follow CDC recommendations to determine when to discontinue home isolation and return to work," it said.
- e. Testing to evaluate protective measures or find transmission hot spots at work.** This kind of surveillance program is more often a public health function, and employers should undertake it only "if the results have a reasonable likelihood of benefiting workers."

III. Personal Protective Equipment (PPE).

Controls, including engineering and administrative controls, safe work practices, and personal protective equipment (PPE) are selected as a result of an employer's hazard assessment. Select and implement appropriate engineering controls (e.g., physical

barriers/shields to separate workers, limiting break room capacity, practicing social distancing, replacing in-person meetings with video-conference calls, ensuring workers wear appropriate face coverings, such as cloth face masks, to contain respiratory secretions). Providing and ensuring workers use appropriate PPE, identified through hazard assessments and in accordance with OSHA's standards at 29 CFR 1910, Subpart I, and OSHA and CDC guidance on use of PPE. (Note: cloth face coverings are not PPE, because they protect other people from the wearer's respiratory secretions, rather than protecting the wearer). N-95 respirators, disposable nitrile gloves, face shields, and disposable Tyvek coveralls are some examples of PPE that may potentially be required. All required PPE shall be made readily available at no cost to the employee.

IV. Face Coverings.

Employee will wear cloth face coverings when working or otherwise within six feet of another person if appropriate for the work environment and job tasks.

V. Procedure for Employee(s) with Positive Tests.

1. If an employee(s) is found to have a fever during a daily temperature check at work, that employee shall immediately be isolated from others, sent home, or to a health care facility, and be tested for the coronavirus. Any employee who might have been infected by that person shall also be sent home to quarantine pending the test results.

2. Protocols for managing people who become ill in the workplace, including details about how and where a sick person will be isolated (in the event they are unable to leave immediately) while awaiting transportation from the workplace, to their home or to a health care facility, and cleaning and disinfecting spaces the ill person has occupied to prevent exposure to other workers, customers, or visitors shall be implemented.

VI. Contact Tracing.

1. Contact tracing for COVID-19 typically involves;
 - a. Interviewing people with COVID-19 to identify everyone they had close contact with during the time they may have been infectious
 - b. Notifying contacts of their potential exposure
 - c. Referring contacts for testing
 - d. Monitoring contacts for signs and symptoms of COVID-19

- e. Connecting contacts with services they might need during the self-quarantine period

To prevent the further spread of disease, people who had contact with someone with COVID-19 are encouraged to stay home and maintain social distance (at least 6 feet) from others until 14 days after their last exposure to a person with COVID-19. Contacts should monitor themselves by checking their temperature twice daily and watching for [symptoms of COVID-19](#).

50. HYDROGEN SULFIDE PROTECTION POLICY

Cox Energy Industrial Coatings, & Cleaning, LLC Hydrogen Sulfide Protection Program

- I. Purpose: The purpose of this program is to establish minimum requirements for job- site specific Hydrogen Sulfide (H₂S) safety, with respect for potential exposures of Cox Energy Industrial Coatings, & Cleanings LLC employees where Hydrogen Sulfide is present or is recognized as potentially being present.
- II. Scope: This program sets forth accepted safety practices for Hydrogen Sulfide (H₂S). This program applies to all employees of Cox Energy Industrial Coatings, & Cleaning LLC, temporary employees, and any sub- contractors working for Cox Energy Industrial Coatings, & Cleaning LLC. When work is performed on a client's site, the client's program shall take precedence, however this document shall cover Cox Energy Industrial Coatings, & Cleaning LLC employees and sub- contractors and shall be used on owned premises, or when a client's program doesn't exist or is less stringent.
- III. Definitions:
 - a. Contingency Plan - a site-specific written document that provides an organized plan for alerting and protecting the public within an area of exposure following the accidental release of all potentially hazardous atmospheric concentrations of hydrogen sulfide.
 - b. Exposure Level - permissible exposure level of hydrogen sulfide is 10 PPM for an 8-hour, time weighted average.
 - c. Gas Detector Instrument - An instrument/detector to measure levels of H₂S. Instruments may be electronically or manually operated.
 - d. Hydrogen Sulfide (H₂S) - is an extremely deadly, toxic gas that in its pure state is colorless and is heavier than air. Additionally:
 - e. It is the second most toxic gas known to man, ranking behind hydrogen cyanide and ahead of carbon monoxide.
 - f. It has the odor of rotten eggs at low concentrations.
 - g. In higher concentrations rapidly paralyze the olfactory nerves (sense of smell).

- h. Is soluble in water and is flammable and poses a definite threat of explosion, and creates toxic by-products when burned.
- i. Parts Per Million (PPM) -parts of vapor or gas per million parts of contaminated air by volume.
- j. Personal H₂S Monitor -An electronic instrument worn on the person that is set to alarm at 10PPM of H₂S.
- k. Possible Locations of H₂S -While clients are required to notify Cox Energy Industrial Coatings, & Cleaning LLC of known H₂S locations, the majority of time H₂S can be located in drilling operations, recycled drilling mud, water from sour crude wells, blowouts, tank gauging, during routine field maintenance involving hydrocarbons, tank batteries and wells.
- l. Venting -the process of discharging a material to the atmosphere through a series piping and/or venting devices, to facilitate the proper and safe dispersion of toxic materials and to minimize personnel exposure.

IV.Key Responsibilities:

1. Project Managers and Supervisors

- a. Shall ensure all employees who are to be assigned to work at locations where hydrogen sulfide is known to be present, or suspected to be present in any concentration, have been trained in hydrogen sulfide safety.
- b. Ensure employees have been medically approved to wear respirators and trained on the safe use of respirators, including a respirator fit test in accordance with the company's Respiratory Protection Program.
- c. Ensure employees have been trained and familiar with personal H₂S monitors and gas detection instruments.
- d. Employees have been provided with and are familiar with the client's safety procedures and execution of H₂S site safety contingency plan.
- e. Ensure the necessary respiratory equipment to perform the work safely is available.
- f. That each employee has been provided with a copy of this program.

2. Employees

- a. Employees are responsible to comply with this program.
- b. Employees must immediately put on supplied air respiratory equipment (SCBA) and/or evacuate the area upon sounding of H₂S alarms.

V. Physical Characteristics:

- a. H₂S paralyzes the sense of smell. Do Not Rely On Smell. To Detect H₂S -Rely Strictly On Instruments Designed To Measure Concentrations Of H₂S.
- b. Hydrogen sulfide is a very dangerous and deadly gas -it is colorless and heavier than air.
 - c. It can accumulate in low places and in small concentrations it has a strong, pungent, somewhat distasteful odor similar to rotten eggs. In higher concentrations, it can deaden the sense of smell (olfactory nerves).
 - d. Exposure to certain concentrations of H₂S can cause serious injury or death, eye irritations, and affects nerve centers of the brain which control breathing

Toxic Effects of Hydrogen Sulfide (H₂S)

CONCENTRATION	PHYSICAL EFFECT
.01 PPM	Can smell odor.
10 PPM	Obvious and unpleasant odor. Beginning eye irritation. ANSI permissible exposure level for 8 hours (enforced by OSHA).
100 PPM	Immediately Dangerous to life or Health (IDLH) Kills smell in 3-15 minutes; may sting eyes and throat. May cause coughing and drowsiness. Possible delayed death within 48 hours.
200 PPM	Kills smell shortly, stings eyes and throat. Respiratory irritation. Death after 1-2 hours exposure.
500 PPM	Dizziness; breathing ceases in a few minutes. Need prompt rescue breathing (CPR). Self-rescue impossible because of loss of muscle control.
700 PPM	Unconscious quickly; death will result if not rescued promptly .
1000 PPM	Unconscious at once, followed by death within minutes.

e. The health effects of hydrogen sulfide include irritation of the eyes, nose, throat and respiratory system. Hydrogen sulfide is both an irritant and a chemical asphyxiant with effects on both oxygen utilization and the central nervous system. Its health effects can vary depending on the level and duration of exposure.

VI. General Work Procedures:

1. Cox Energy Industrial Coatings, & Cleaning LLC shall have a written confined space program per 29 CFR 1910.146 and employees shall be trained under CFR 1910.146(g) and Cox Energy Industrial Coatings, & Cleaning LLC shall be aware of owner's contingency plan provisions.
2. Each person entering a H₂S designated location, regardless of the concentration, shall wear a personal H₂S monitor and shall carry a 5-minute escape pack with them at all times. Personal or area monitors that alarm when PEL exceeds the preset level of 20 PPM for CFR 1910 or 10 PPM for CFR 1926.
3. When work requires opening any equipment on location that has the potential of releasing concentrations of H₂S at 100 PPM or higher, two or more H₂S trained persons shall be present and follow these procedures prior to opening and during planned operations. Each person entering the H₂S location shall don a personal H₂S monitor prior to entry. A JSA meeting shall be held with everyone on location to discuss the work plan, the responsibilities of each person and the site specific contingency plan.
4. Each person shall have either a self - contained breathing apparatus (SCBA) or a supplied airline respirator equipped with a 5-minute escape pack, and shall be worn when opening the equipment to the surrounding atmosphere.
5. At least one person (per two workers), equipped with a SCBA

will act as a stand-by person and may not participate in the work being performed until the atmosphere has been tested and found to have no H₂S present in quantities over 10 PPM. The stand-by person shall be stationed up wind, within 100 feet and in clear view of the workers.

6. If an operator or other third party provides the stand-by person, it will be the responsibility of the Cox Energy Industrial Coatings, & Cleanings LLC Project Manager/supervisor in charge to verify that the person has been H₂S, CPR, and First Aid trained, and that they have been provided the proper respiratory equipment.

7.

8. Only Cox Energy Industrial Coatings, & Cleaning LLC employees may wear Cox Energy Industrial Coatings, & Cleaning LLC respiratory equipment.

9. If Cox Energy Industrial Coatings, & Cleaning LLC employees will use client or other third-party equipment, the equipment shall be inspected to ensure it is safe to use and meets Cox Energy Industrial Coatings, & Cleanings LLC standards and requirements.

10. After the equipment has been locked and tagged out (per Cox Energy Industrial Coatings, & Cleanings LLC Lockout/Tagout Program), opened and the H₂S concentration has been cleared to less than 10 PPM, the stand-by person will no longer be required. Work may then be performed without respiratory equipment, except for the required 5-minute escape pack.

11. Maintain compliance with permit requirements of Cox Energy Industrial Coatings, & Cleaning, LLC and any requirements by the client.

12. Verify that proper safety equipment is available, functioning

properly and is utilized.

13. Check and remain aware of wind conditions and direction.
14. Perform a thorough check of the downwind area prior to the start of any potentially hazardous work activity.
15. Check for other personnel and ignition sources (Hot Work Permit).
16. Ventilate work areas by venting and purging lines and vessels prior to beginning any work activities.
17. Keep all non-essential personnel away from work areas.
18. Immediately vacate the area when any H₂S alarm monitor sounds and do not re-enter without proper respiratory protection.

VII. Equipment - The following equipment shall be provided and used as required by this program:

1. Personal H₂S monitor set to alarm at permissible exposure limit of 10 PPM for OSHA CFR1926 requirements and 20 PPM for OSHA CFR1910 requirements. Fixed monitors may be present as well at the same alarm setting.
2. Portable H₂S gas testing instrument, either electronic or manual pump - operated, capable of testing the suspected concentrations of H₂S in the work area.

3. Each testing instrument shall be capable of testing the suspected concentrations of H₂S by using the manufacturer's recommended calibration equipment or other acceptable means of measuring the concentration of gas.
4. Testing instruments shall be calibrated periodically according to the manufacturer's recommendation, and at least annually.
5. Calibration kits with regulator for calibrating the personal monitor(s). A "bump" test personnel monitors is required before commencing H₂S operations.
6. NIOSH certified calibration gas cylinder for testing the personal monitor.
7. NIOSH-certified self-contained breathing apparatus (air pack) with a minimum of a 30-minute air supply or airline respirator with escape SCBA should be used.
8. Full face, air supplied, positive pressure hose line respirator, with 5 minute escape pack attached.
9. Respirator wearers requiring corrective eyewear will be fitted with spectacle kits according to the respirator manufacturer, at no expense to the employee.
10. Respirators and their components, including all fittings of hoses, shall not be interchanged, which if done, would violate the approval rating of said respirator or related equipment.

VIII. Medical:

1. Each employee shall have completed a medical evaluation by a physician or licensed health care professional to determine the employee's ability to wear a respirator as required by the Cox Energy Industrial Coatings, & Cleaning LLC Respiratory Protection Program.
2. Each employee shall successfully complete the medical questionnaire and examination before being allowed to be fit tested with a respirator.

IX. Training - Employees required to work on H₂S locations shall be trained in the following:

1. Physical and chemical properties of H₂S.
2. Sources of H₂S.
3. Signs and symptoms of H₂S exposure, acute and chronic toxicity.
4. Personal protective equipment required working around H₂S
5. Use of contingency plans and emergency response
6. Rescue techniques, first aid, and post exposure evaluation
7. Use, care, and calibration of personal monitors and gas detection instruments
8. Employees and other personnel visiting H₂S locations who will not be involved in the work shall be briefed on the following prior to entering.
9. Site-specific sources of H₂S
10. Health hazards of H₂S
11. Routes of egress
12. Emergency assembly areas
13. Applicable alarm signals and how to respond in the event of an emergency.
14. Each employee, when working alone in a H₂S designated area, shall plan and become familiar with self-escape procedures to

include being aware of wind direction and obstacles to avoid when exiting the work area.

15. Employees working under the buddy system shall pre-plan an emergency rescue and/or evacuation procedure prior to commencing work, and arrange for periodic communications with his/her supervisor, and document the discussion on each employee's JSA document.

51. SHORT
SERVICE
EMPLOYEE (SSE)
PROGRAM

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC'S

SHORT SERVICE EMPLOYEE (SSE) POLICY

PURPOSE

This Program ensures that personnel with less than six months experience in Cox Energy, Industrial Coatings & Cleaning, LLC (the "Company") and/or are new to their job role(s) are identified, supervised, and managed. The Company will verify that each employee has the skills and knowledge to perform their task(s) prior to their arrival to the worksite. The intent of this policy is to prevent injury or harm to personnel, property, and the environment.

SCOPE

This program applies to all company facilities and worksites. It is important to ensure that newly placed employees work under the direction of experienced personnel.

A Short Service Employee ("SSE") will not work alone. SSEs will make up no more than 50% of a single crew at one time. Further, a crew of 5 employees or less will include no more than one SSE at a time.

Subcontractors are included in this program and must manage their SSEs in accordance with the requirements of the Short Service Employee Program.

A SSE will be under this program for at least six months and until the SSE demonstrates the knowledge and skills necessary to perform their tasks safely.

SECTION 1. DEFINITIONS

Mentoring - a process of transferring skills and knowledge from one person to another in a work environment.

Supervisor - The individual responsible for the direct supervision and oversight of an employee.

Short Service Employee (SSE) - A newly placed full-time or temporary employee or subcontractor with less than six months experience with his/her present employer or in his/her present role/assigned job.

Short Service Employee Mentor - Person with at least 6 months' employment with the company who has demonstrated safe and efficient work habits.

SECTION 2. RESPONSIBILITIES

MANAGEMENT RESPONSIBILITIES

The responsibilities of company leadership and management are to set expectations, evaluate effectiveness and:

- Make and demonstrate a personal commitment to a strong and functional Health Safety and Environmental work culture,
- Establish a written, signed and dated HSE policy that sets compliance expectations for management and employees,
- Provide employees access to company policies, standards, and procedures,
- Establish written HSE Orientation and Short Service Employee Programs for all employees newly assigned to any job or task,
- Ensure that all employees new to a job assignment are identified to the responsible supervisor(s) and placed into the HSE Orientation and Short Service Employee Programs, and
- Audit, review performance and take timely corrective actions to continually improve the effectiveness of the orientation and Short Service Employee Programs.

SUPERVISOR RESPONSIBILITIES

The responsibilities of Supervisors in the Short Service Employee Program are:

- Know which jobs and crews are using Short Service Employees,
- Ensure Short Service Employees are appropriately identified per this plan,
- Develop and communicate Job Safety Analyses (JSAs) to affected personnel upon initial assignment and when the operation changes,
- Ensure Short Service Employee Mentor possesses proper knowledge and skills in the job task assigned,
- Ensure Short Service Employee Mentor is adequately training SSE,
- Ensure Short Service Employee is gaining the necessary knowledge and skills in the job tasks, and
- Follow all safety rules and company policies.

MENTOR RESPONSIBILITIES

The responsibilities of the Mentor in the Short Service Employee Program are to:

- Be an experienced and responsible person assigned by the supervisor to work with the new employee,
- Be selected based on a history of safe work and policy/procedural knowledge,
- Be able to communicate the expectations and characteristics of work tasks and their associated hazards,
- Have a patient disposition, as well as the desire and willingness to devote the necessary time to succeed as a mentor,
- Possess knowledge and skills in the job tasks assigned to the SSE,
- Be willing and able to effectively listen to the SSE to determine if the SSE is learning and retaining the knowledge being shared,
- Be willing to watch an SSE perform a job without interfering as long as the SSE is not in a position to harm themselves, others, the environment, or the equipment,

- Adopt a positive safety attitude, avoid criticism, and strive to build confidence and self-esteem in the SSE,
- Be able to teach the SSE the proper way to create a quality JSA and to follow that JSA in performing tasks,
- Keep abreast of new equipment in their field of expertise,
- Refrain from taking shortcuts and doing anything else that jeopardizes health or safety,
- Demonstrate a positive work ethic at all times, and
- Introduce the SSE Checklist (Appendix B) to the new employee. The checklist is a tool to train the new employee and monitor progress,
- Review the checklist with the new employee periodically over a six-month period, and forward the information for supervisor and management review, and
- Follow all company policies and procedures.

SHORT SERVICE EMPLOYEE RESPONSIBILITIES

The responsibilities of the Short Service Employee are to:

- Be willing to watch and listen to the Mentor,
- Establish a positive safety attitude toward assigned job tasks,
- Learn how to create and follow JSAs,
- Be willing to learn how to do each task in a safe and environmentally sound manner,
- Stop and report unsafe conditions immediately,
- Participate in safety meetings, and
- Follow all safety rules and company policies.

HSE COORDINATOR RESPONSIBILITIES

The responsibilities of the HSE Coordinator in the Short Service Employee Program are to:

- Serve as subject matter resource to support the Supervisor and SSE
- Ensure the SSE gets the necessary safety training, and
- Follow all policies and procedures.

SECTION 3, PROCEDURES - SHORT SERVICE EMPLOYEE PROGRAM

Notification (Appendix A)

CEICC's HR department shall notify worksite management/supervision and safety department of all newly hired or reassigned employees. In turn, Management will notify the Safety Coordinator of new employees in their region who require training.

Prior to starting work, the company shall notify the host facility (project coordinator, contractor contact, and/or on-site supervisor) if SSEs are present on work crews.

Orientation

- Management will provide a company-approved orientation. The orientation will include a Job Orientation Checklist (Appendix C) that the supervisor reviews with each newly hired employee.
- Each SSE will be provided orientation specifically based on job position and job-related topics prior to performing job tasks.
- Each SSE will be taught how to access company policies, standards, and procedures.
- Satisfactory completion of the orientation must be signed and dated by the employee and supervisor.

Training

The supervisor will ensure that each SSE is properly trained per federal, state, industry, company, and operator requirements before starting work when:

- The employee is hired;
- The employee is appointed a new job assignment; and
- The employee is exposed to new substances, processes, procedures, equipment, etc. that represent a new hazard to the employee.

The supervisor will ensure that each SSE is properly trained in:

- The hazard(s) present in the workplace;
- The policies, procedures, processes, and PPE utilized to control these hazards and prevent illnesses, injuries, property damage and/or environmental incidents; and
- The skills necessary to conduct their assigned jobs safely and efficiently while providing quality and economy.

Mentoring System

- A mentoring system shall be implemented to provide guidance to SSE and assist with their development.
- A mentor may only be assigned to one crew that includes SSEs, and he/she must remain on site with them.

Identification System

It is important for supervisors, co-workers, and project managers to recognize an SSE; therefore, an identification system is developed for this purpose. The identification system is a means of communicating to the workforce that the SSE is in a transitional period. It will not be a designation of in-experience or used to mark an employee as having lower skill sets.

The SSE shall be visibly identified through the use of different colored hardhats, vests, decal or other clothing or PPE that prominently identifies the employee as an SSE employee. For example, if a hardhat decal is used, it should be placed on each side of the hardhat with a label under the decal indicating the date when the employee is no longer

considered to be an SSE. The Supervisor and the SSE Mentor will provide supervision and not allow the SSE to perform any task in which they have not been properly trained. The Supervisor and the SSE Mentor will ensure that the SSE understands the task to be performed and the associated hazards. In most cases, CEICC SSE identifier will be green decal placed on each side of the SSE's hardhat.

Short Service Employees shall be monitored for compliance with health, safety, and environmental policies and procedures. Once the Short Service Employee has demonstrated competency and compliance with HSE policies and procedures, the contractor may remove the hi-visibility identifier. The Supervisor will remove the decals and other identifiers upon expiration of the SSE term, and after verifying that the SSE exhibits a knowledge and skill level to perform the job tasks assigned.

The method used to identify SSEs will be communicated to the client.

Documentation

The HR Specialist will complete the SSE Notification form for new employees (Appendix A) and forwards to the Supervisor.

Upon completion of training, supervisor signs off and forwards notification form to HR.

All records for the SSE Orientation and Training should be maintained at the employee's location by the Supervisor.

SSE Quality Assessment and Control

- Management shall review the effectiveness and quality of the Short Service Employee Program at least annually.
- SSE Orientation and Training documentation shall be audited for accuracy, timeliness, and completeness.
- Onsite inspections shall be conducted to ensure that supervisors, mentors, and SSE are adhering to the SSE Program.
- The number of incidents involving new employees will be measured, compared to the general workforce, and evaluated for trends or performance variations.
- Management will ensure that all program deficiencies are promptly corrected and documented.

APPENDIX A

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC'S SHORT SERVICE EMPLOYEE NOTIFICATION FORM

- Short Service Employee Information (completed by HR Specialist)

Employee Name (Print)	
• Employee Hire Date	Change Date:
• Current Job Title	
• Time in Present Position	
• Years of Experience	
• Types of Experience	

SSE Mentor Information (completed by Supervisor)

Employee Name (Print)	
Employee Hire Date	
Current Job Title	
Time in Present Position	
Years of Experience	
Types of Experience	

Supervisor Sign-Off (Send to Project Manager)

Print Name:	Print Job Title:	Signature:

Send to Safety and HR Directors and retain in employee's files.

Employee has received the required Safety Orientation	Yes		No	
Employee has received all required Safety Training *	Yes		No	
Employee has received the required safety training except (Attach list of any exceptions)	Yes		No	

* Safety training shall be determined and conducted by individual company policies and procedures, in compliance with all regulatory requirements.

APPENDIX B

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC'S SHORT SERVICE EMPLOYEE CHECK LIST

Mentor's Initials as Completed	SSE Initials as Completed	Short Service Employee sets clear expectations and consequences for safe behaviors.
		Does not take unnecessary risks.
		Asks for help when needed.
		Does not try to lift or handle too heavy of a load. Gets mechanical help when needed.
		Raises awareness of possible hazards.
		Intervenes with unsafe behaviors.
		Understands his/her "stop work" authority and responsibility
		Short Service Employee demonstrates ability to do job required:
		Works in a craftsman-like manner.
		Has clear understanding of job to be done.
		The new employee can use tools safely by:
		Communicating
		Demonstrating
		Observing
		New Employee is able to identify the following at the work site:
		Struck by hazards
		Crushed by hazards
		Burns and scalds
		Sharp objects and precautions
		Trip hazards and precautions
		Electrical hazards and precautions
		Fall hazards and precautions
		Hot and / or cold surfaces, piping, and equipment
		Chemical hazards and precautions
		Emergency procedures
		Emergency communications
		Respiratory hazards and precautions
		Toxic substance hazards and precautions
		Any additional hazards specific to the job site
		Short Service Employee exhibits compliance to:
		General safety rules and policies
		Safety rules and policies specific to the job being performed

		Housekeeping policies
		PPE requirements
		Short Service Employee shows competency on following equipment:
		a. Equipment Name:
		b. Equipment Name:
		c. Equipment Name:
		Other:

Mentor

New Employee

Today's Date

New Hire Date

Review Dates: 3-day review_____ 60-day review_____ 90-day
review_____

120-day review_____ 150-day review_____ 180-day review_____

DIST: Site Supervision - original

Project File – copy

Safety Dept. - copy

APPENDIX C

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC'S JOB ORIENTATION GUIDE

Company: Cox Energy, Industrial Coatings &
Cleaning, LLC

Employee:

Trainer:

Hire Date:

Date:

Position:

This checklist is a guideline for conducting employee safety orientations for employees new to Cox Energy, Industrial Coatings & Cleaning, LLC. Once completed and signed by the supervisor and employee, it serves as documentation that orientation has taken place.

	Date	Initials
1. Explain the company safety program, including:		
Orientation	_____	_____
On-the-job training	_____	_____
Safety meetings	_____	_____
Accident investigation	_____	_____
Disciplinary action	_____	_____
2. Use and care of personal protective equipment, (e.g., hard hat, fall protection, eye protection, foot protection, FRC, etc.)	_____	_____
3. Line of communication and responsibility for immediately reporting accidents.		
A. When to report an injury	_____	_____
B. How to report an injury	_____	_____
C. Who to report an injury to	_____	_____
D. Filling out accident report forms	_____	_____
4. General overview of operation, procedures, methods, and hazards as they relate to the specific job	_____	_____
5. Pertinent safety rules of the company	_____	_____
6. "Stop Work" Authority and responsibility is understood		
7. First-aid supplies, equipment, and training		
A. Obtaining treatment	_____	_____
B. Location of Facilities	_____	_____
C. Location and names of First-aid trained personnel	_____	_____
8. Emergency plan		
A. Exit location and evacuation routes	_____	_____
B. Use of fire-fighting equipment (extinguishers, hose)	_____	_____
C. Specific procedures (medical, chemical, etc.)	_____	_____

9.	Vehicle safety	_____	_____
10.	Personal work habits	_____	_____
A.	Serious consequences of horseplay	_____	_____
B.	Fighting	_____	_____
C.	Inattention	_____	_____
D.	Smoking policy	_____	_____
E.	Good housekeeping practices	_____	_____
F.	Proper lifting techniques	_____	_____

NOTE TO EMPLOYEES: Do not sign unless ALL items are covered, and ALL questions are satisfactorily answered.

The signatures below document that the appropriate elements have been discussed to the satisfaction of both parties, and that the supervisor and the employee accept responsibility for maintaining a safe and healthful work environment.

Date: _____ Supervisor's Signature: _____

Date: _____ Employee's Signature: _____

52. BUSINESS CONTINUITY AND MANAGEMENT OF CHANGE POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC BUSINESS CONTINUITY AND MANAGEMENT OF CHANGE (BC&MOC) PROGRAM

I. Purpose:

The purpose of this Business Continuity and Management of Change (BC&MOC) process is to trigger a formal evaluation of possible safety, health, or environmental hazards brought on by temporary and/or permanent changes related to personnel, technical functions, scope of work, or equipment within Cox Energy, Industrial Coatings & Cleaning, LLC ("Cox Energy").

II. Scope:

"The most difficult part of Management of Change is recognizing change." The most important starting point for the Cox Energy's BC&MOC program is clearly defining for the organization just what constitutes a "change" that we wish to manage, or more simply, what change falls under the BC&MOC process and what sort of changes do not. It is the responsibility of the business leadership of Cox Energy to define change in terms consistent with Best Management Practices with regard to safety, health and environmental hazards and any regulatory precedents.

III. Risk Exposure and Undesired Consequences:

Cox Energy has different areas of risk exposure and each has a different level of undesired consequences. The Business Leader shall assess the risks involved with respect to safety, health, and environmental hazards and define the level for uncontrolled change. A few (but by no means all inclusive) examples of the sorts of changes a Cox Energy may wish to manage are:

- Addition of new process equipment or critical business system (including software)
- "Not in Kind" replacement of process equipment or parts
- Modifications or minor additions to process equipment
- Modifications or minor additions to critical business system (procedural or software)
- Modifications or minor additions to infrastructure/non-process equipment
- Changes to process control and/or instrumentation (includes control strategies)
- Changes in specifications or sourcing of technical MRO
- Changes in critical process parameter operating limits (outside of ranges specified in SOP)
- Alterations to safety systems (interlocks, shutdowns, fire, or explosion suppression, etc.)

- Revisions to standard operating procedures (including emergency procedures)
- Changes in site-level organizational structure
- Changes to maintenance procedures
- Changes in raw material/component specifications or sourcing
- Alterations or new connections to utilities systems (air, electrical, gas, water, steam, etc.)
- Alterations or new connections to critical data networks
- Changes to QA procedures or critical test equipment

IV. The Change Management Process:

1. Cox Energy shall prepare for change. For the organization to successfully pursue and implement change, it must be prepared both logistically and culturally. Before delving into logistics, cultural preparation must first take place. In the preparation phase, the business manager shall focus on helping employees recognize and understand the need for change. Gaining this initial buy-in from employees who will help implement the change can remove friction and resistance later on.

2. Craft a Vision and Plan for Change. The organization must be ready to embrace change; managers must develop a thorough and realistic plan for bringing it about. The plan should detail:

- Strategic goals: What goals does this change help the organization work toward?
- Key performance indicators: How will success be measured? What metrics need to be moved? What is the baseline for how things currently stand?
- Who will oversee the task of implementing change? Who needs to sign off at each critical stage? Who will be responsible for implementation?
- Project scope: What discrete steps and actions will the project include? What falls outside of the project scope?

The plan should also account for any unknowns or roadblocks that could arise during the implementation process and would require flexibility to overcome.

3. Implement the Changes. After the plan is created, Cox Energy shall follow the steps outlined within it to implement the required change. Whether that involves changes to the company's structure, strategy, systems, processes, employee behaviors, or other aspects will depend on the specifics of the initiative. During the implementation process, Cox Energy shall be focused on empowering their employees to take the necessary steps to achieve the goals of the initiative. They shall also do their best to anticipate roadblocks and prevent, remove, or mitigate them once identified. Repeated communication of the organization's vision is critical throughout the implementation process to remind team members why change is being pursued.

4. *Embed Changes within the Company Culture and Practices.* Once the change initiative has been completed, Cox Energy must prevent a reversion to the prior state or status quo. This is particularly important for organizational change related to processes, workflows, culture, and strategies. Without an adequate plan, employees may backslide into the “old way” of doing things, particularly during the transitory period.

By embedding changes within the company’s culture and practices, it becomes more difficult for backsliding to occur. New organizational structures, controls, and reward systems should all be considered as tools to help change stick.

5. *Review Progress and Analyze Results.* Just because a change initiative is complete does not mean it was successful. Cox Energy shall conduct an analysis and review, or a “project postmortem,” which can help the business leaders understand whether the change initiative was a success, failure, or mixed result. It can also offer valuable insights and lessons that can be leveraged in future change efforts.

V. Conflict Management and Resolution:

The last step in the change management process, after fully implementation of the change ideas into the organization, is now the responsibility of the managers to see that the organizational goals are being achieved. The goal is to improve the safety, health, and environmental performance of the organization. To measure improvement, we must compare the results of pre change in the organization with post change. With this information in hand, corrective action or decisions can be made to improve future situations.

Assess change needs----- Initiate change -----Implement change-----Evaluate change

VI. Resistance to change:

It may happen that some of the Cox Energy’s employee, while doing or after implementation of the change in the organization, are not satisfied and they may create problems for the change management process. This may include the old employees of the organization, the middle level managers, and/or other factors, but it typically includes the following resistance to change:

- The employees are not satisfied with change due to their own self-interest.
- Employees could also create resistance due to lack of trust and/or understanding of the reasons for the change.
- The uncertain situation may also move employees to create resistance because of lack of information about the change.
- Different idea and goals of the employees or people may also hamper the change management process.

Resistance in the change management process must be identified and reduced in order for the process to be effective. Therefore, Cox Energy shall take active steps to reduce the resistance.

VII. Document Control:

BC&MOC addresses only changes things that presently existing. Therefore, any changes to any existing documents, processes, equipment, software "Not in Kind" replacement or minor modifications to standard practices shall not be approved by Cox Energy. Instead, Management shall thoroughly and completely document any revisions and entered revisions into the Company Database in a timely manner. All such revisions shall be communicated to the affected employees upon approval of said revision.

* Note: For implementation of the BC&MOC Program on the jobsite, please refer to the Company "Stop Work Authority Policy" (Section3), and the "Work Planning/Pre-Construction Policy" (Section 31) in the Cox Energy's Environmental Health and Safety Manual.

53. WORK PLATFORM/ SCAFFOLD USE POLICY

Cox Energy, Industrial Coatings & Cleaning, LLC Work

Work Platform/Scaffold Use Policy

I. General Work Platform/Scaffold Rules:

- a. A Work Platform/Scaffold is defined as an elevated temporary work platform.
- b. Work Platform/Scaffold shall be furnished and erected in accordance with OSHA requirements as enumerated in CFR 1910.28.
- c. Employees who perform work while on a Work Platform/Scaffold must be trained by a qualified person. The training shall include: 1) The nature of any electrical hazards, fall hazards and falling object hazards in the work area; 2) The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used; 3) The proper use of the Work Platform/Scaffold, and the proper handling of materials on the Work Platform/Scaffold;
4) The maximum intended load and the load-carrying capacities of the Work Platform/Scaffold used; and 5) Any other pertinent requirements of the Regulation.
- d. When there is reason to believe an employee lacks the skill or understanding of the safe erection, use or dismantling of Work Platforms/Scaffolds, the employee shall be re-trained. Retraining is required in at least the following situations: a) Where changes at the worksite present a hazard about which an employee has not been previously trained; or b) Where changes in the types of Work Platforms/Scaffolds, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been previously trained; or c) Where inadequacies in an affected employee's work involving Work Platform/Scaffolds indicate that the employee has not retained the requisite proficiency.

- e. Work Platform/Scaffolds shall not be, erected, moved, dismantled or altered unless supervised by a competent person.
- f. No work on snow or ice covered platforms.
- g. No work during storms or high winds (25mph)
- h. Fall protection (PFAS or guardrails) requirements
 - 1. Required at 10 foot on an unprotected edge.
 - 2. PFAS in lieu of guardrails on some Work Platforms/Scaffolds
 - 3. PFAS & guardrails on suspension Work Platforms/Scaffolds
- i. Work Platforms/Scaffolds and Work Platforms/Scaffolds components shall be inspected for visible defects by a competent person before each work shift, and after any occurrence which could affect a Work Platforms/Scaffolds' structural integrity. Any part of a Work Platform/Scaffold damaged or weakened shall be immediately repaired or replaced, braced or removed from service until repaired.
- j. A green tag shall designate a complete Work Platform/Scaffold with no restrictions for access.
- k. A yellow tag shall designate an incomplete Work Platform/Scaffold and list the requirements for accessing the Work Platform/Scaffold (i.e. PFAS required).
- l. All access points to a Work Platform/Scaffold shall be tagged and the tag used shall be common throughout the Work Platform/Scaffold. **There shall be no mixing of tags.** An access point not tagged shall not be used.
- m. All defective equipment shall tagged by a competent person with an information tag stating "Defective Equipment, Do Not Use" and removed from service until repaired by authorized personnel or

destroyed. Unsafe equipment or conditions must be tagged out by a competent person and must be complied with.

II. Mobile Work Platforms/Scaffolds, Scissors Lifts, & Aerial Lifts

- a. Mobile Work Platforms/Scaffolds shall be designed, erected, and used in accordance with the OSHA requirements outlined in CFR 1910.29.
- b. Aerial lifts shall be used in accordance with manufacturer's recommendations and in accordance with the OSHA requirements outlined in CFR 1916.453.
 - 1. Only trained & authorized personnel shall operate an aerial lift.
 - 2. Lift controls shall be tested every day to determine they are in safe working operation.
 - 3. PFAS shall be worn whenever operating an aerial lift.
 - 4. Belting off to an adjacent structure while working from an aerial lift is prohibited.
 - 5. Personnel shall stand firmly on the floor of the basket and shall not sit, climb, or stand on the guardrail system.
- c. Scissors lifts shall be used in accordance with manufacturer's recommendations and in accordance with OSHA requirements outlined in CFR 1926.452(w).

54. HAZARDOUS
WASTE
OPERATIONS
(HAZWOPER)
POLICY

Cox Energy, Industrial Coatings & Cleaning, LLC

Hazardous Waste Operation (HAZWOPER)

I. Purpose:

1. Hazardous materials have the potential for an enormous impact on victims, responders, the community and the surrounding environment. Without effective mitigation (dealing with) of these incidents, the hazard will not simply go away. Another important responsibility is to **communicate all information gathered during the approach and the initial scene survey** to the appropriate authorities. The purpose of this imperative information is so other responding units do not inadvertently approach from the hazardous side of the incident. This written program is designed to identify, evaluate, control safety and health hazards and provide for emergency response. This program is designed to identify, evaluate, control safety and health hazards and provide for emergency response. This program also details a specific chain of command, address tasks and objectives of the operations, and address site specific procedures.

II. Definitions:

1. **BUDDY SYSTEM** - means a system of organizing employees into work groups in such a manner that each employee of the work group is designated to be observed by at least one other employee in the work group. The purpose of the buddy system is to provide rapid assistance to employees in the event of an emergency.

2. **CLEAN-UP OPERATIONS** - means an operation where hazardous substances are removed, contained, incinerated, neutralized, stabilized, cleared-up, or in any other manner processes or handled with the ultimate goal of making the site safer for people or the environment.

3. **DECONTAMINATION** - means the removal of hazardous substances from employees and their equipment to the extent necessary to preclude the occurrence of foreseeable adverse health effects.

4. **EMERGENCY RESPONSE** - means a response effort by employees from outside the immediate release area or by other designated responder to an occurrence which results, or is likely to result in an uncontrolled releases of a hazardous substance.

5. **FACILITY** - means (a) any building, structure, installation, equipment, pipe or pipeline, well, pit, pond, lagoon, impoundment, ditch, storage container, motor vehicle, rolling stock, or aircraft, or any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located.

6. **HAZARDOUS WASTE OPERATION** - means any operations conducted within the scope of 29 CFR 1910.120.

7. **HAZARDOUS WASTE SITE** - means any facility or location within the scope of 29 CFR 1910.120 at which hazardous waste operations take place.

8. **HAZARDOUS SUBSTANCES** - means a material and its mixtures or solutions, that is regulated by the U. S. Environmental Protection Agency (EPA) and is subject to the Uniform Hazardous Waste Manifest requirements of the EPA.

9. **PERMISSIBLE EXPOSURE LIMITS** - means the exposure, inhalation or dermal permissible exposure limit specified in 29 CFR Part 1910. subparts G and Z.

10. **HEALTH HAZARDS** - means a chemical, mixture of chemicals or a pathogen for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees.

11. **IMMEDIATELY DANGEROUS TO LIFE OR HEALTH** - means an atmospheric concentration of any toxic, corrosive or asphyxiate substance that poses and immediate threat to life or would cause irreversible or delayed adverse health effects or would interfere with an individual's ability to

escape from a dangerous atmosphere.

12. **OXYGEN DEFICIENCY** - means that concentration of oxygen by volume below which atmosphere supplying respiratory protection must be provided. It exists in atmospheres where the percentage of oxygen by volume is less than 19.5 percent oxygen.

13. **QUALIFIED PERSON** - means a person with specific training, knowledge and experience in the area for which the person has the responsibility and the authority to control.

14. **SITE SAFETY AND HEALTH SUPERVISOR** - means the individual located on the hazardous waste site that is responsible to the employer and has the authority and knowledge necessary to implement the site safety and health plan and verify compliance with applicable safety and health requirements.

III. Training:

1. All employees working on site (exposed to hazardous substances, health hazards or safety hazards) and supervisors/management shall receive training before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards and they shall receive review training. Employees who work on-site with exposure to hazardous substances must be trained before they are allowed to do work in hazardous waste operations.

2. Workers that perform certain operations conducted under RCRA and operations at Treatment, Storage, and Disposal Facilities (TSDF) with certain exceptions shall be trained by a qualified instructor as per the OSHA Standard 1910.120 (p).

3. Employers whose workers are engaged in emergency response to hazardous substance releases, no matter where it occurs shall be trained by a qualified instructor as per OSHA Standard 1910.120(q).

IV. Hazardous Material Identification

1. The most important action that must be performed at the Hazardous Waste Site is to identify that a hazardous material is present, determine what the material is, and evaluate the threats the material poses.

2. Initial Site Survey

a. The survey should try to identify the present hazard and the associated harm it may cause. Be aware that this should all be **accomplished from a safe distance where there is no threat to the personnel conducting the survey**. If determination cannot be made from an uphill and upwind position, wait for personnel trained at a higher level to arrive with appropriate detection equipment for identification.

b. Available methods of identification at the scene are as follows.

Be aware of:

- Occupancy / location
- Container shapes and sizes
- Markings and coloring
- Placards / labels
- Shipping papers / Material Safety Data Sheets / Facility Pre-Plans

3. Categories of Material Identification:

- a. Material Known and poses a Substantial Threat
- b. Material Known and poses No Threat.
- c. Material Unknown, Threat Unknown.

4. The most prudent action to take when dealing with an unknown substance is to assume the worst. Never use touch, taste or smell to try to identify an unknown material.

5. Hazardous material responders shall never pass into the contaminated area of the release for any reason outside of duty to save lives.

6. Responders must not exceed their level of training and protection.

V. Work-Site Hazard Controls:

1. Engineering controls and work practices shall be instituted to reduce and maintain employee exposure to or below the permissible exposure limits for substances regulated by 29 CFR Part 1910, except to the extent that such controls and practices are not feasible. Engineering controls which may be feasible include the use of pressurized cabs or control booths on equipment, and/or the use of remotely operated material handling equipment. Work practices which may be feasible are removing all non-essential employees from potential exposure during opening of drums, wetting down dusty operations and locating employees upwind of possible hazards.
2. Defensive Actions;
 - a. Control and confine the scene.
 - b. Eliminate ignition sources.
 - c. Protect material from heat, shock, contamination, moisture, etc
 - d. Confine material, avoid runoff.
- c. Avoid contact with the material.
3. Defensive Control Options
 - a. Absorption
 - b. Confinement
 - c. Dilution
 - d. Vapor Dispersion
 - e. Vapor Suppression
4. Physical hazards of HAZWOPER SITES
 - a. Cleanup operations often involve containing, incinerating, neutralizing, stabilizing, or handling hazardous substances that put workers at obvious risk. But there are many other physical hazards that put HAZWOPER workers at risk;
 - b. Potential physical hazards that maybe encountered on a

HAZWOPER site include but are not limited too;

- i. Walking & Working Surfaces
- ii. Fall Prevention & Protection
- iii. Electrical Hazards
- iv. Heat and Cold Illness & Injuries
- v. Confined Space Entry
- vi. Handling Drums & Containers

VI. Industrial Hygiene Monitoring

1. Industrial hygiene monitoring serves the following purposes:
 - It determines the effectiveness of the engineering and/or administrative controls and work practices being utilized (are employees being protected).
 - It assesses the effectiveness of any PPE being used, (again, are employees being protected).
 - It provides documentation that Contractors and Companies are in compliance with the legal requirements of the OSHA standards.
2. Monitoring shall be performed where there may be a question of employee exposure to hazardous concentrations of hazardous substances in order to assure proper selection of engineering controls, work practices and personal protective equipment so that employees are not exposed to levels which exceed permissible exposure limits, or published exposure levels if there are no permissible exposure limits, for hazardous substances. The company shall do air monitoring when first entering an area with potentially hazardous materials and also do monitoring periodically to see if the situation has changed while hazardous material work takes place. Monitoring shall determine;
 - a. Any required PPE
 - b. Perimeter and zone locations;
 - c. Remediation techniques; and
 - d. Decontamination procedures.
3. Air monitoring shall be used to identify and quantify airborne levels of hazardous substances. The monitoring shall address initial entry, periodic monitoring, possible IDLH conditions and wherever exposure may be a possibility.

4. Determine Potential for Exposure

- Bulk Sampling
- SDS Documents
- As-Built Plans or Specifications
- Maintenance Records/Histories

5. Air Monitoring Equipment

- a. Assure proper maintenance and calibration per manufacturer's instructions.
- b. May only operate properly within certain temperatures and relative humidity
- c. Will not work in an Oxygen deficient atmosphere.

VII. Medical Surveillance:

1. Members of an organized and designated hazmat team shall receive a baseline physical examination and be provided with medical surveillance as required in paragraph (f) of CFR 1910.120

2. This program provides for, at no cost to the employees, medical/biological monitoring in the event of a potential exposure to any hazardous material encountered on a HAZWOPER site. All employees who are or may be exposed to hazardous substances or health hazards at or above the established permissible exposure limit, above the published exposure levels for these substances, without regard to the use of respirators, for 30 days or more a year, shall be provided medical surveillance.

3. Any employee who exhibits signs or symptoms which may result from exposure to hazardous substances during the course of an emergency incident either immediately or subsequently, shall be provided with medical consultation as required in paragraph CFR 1910.120(f)(3)(ii)

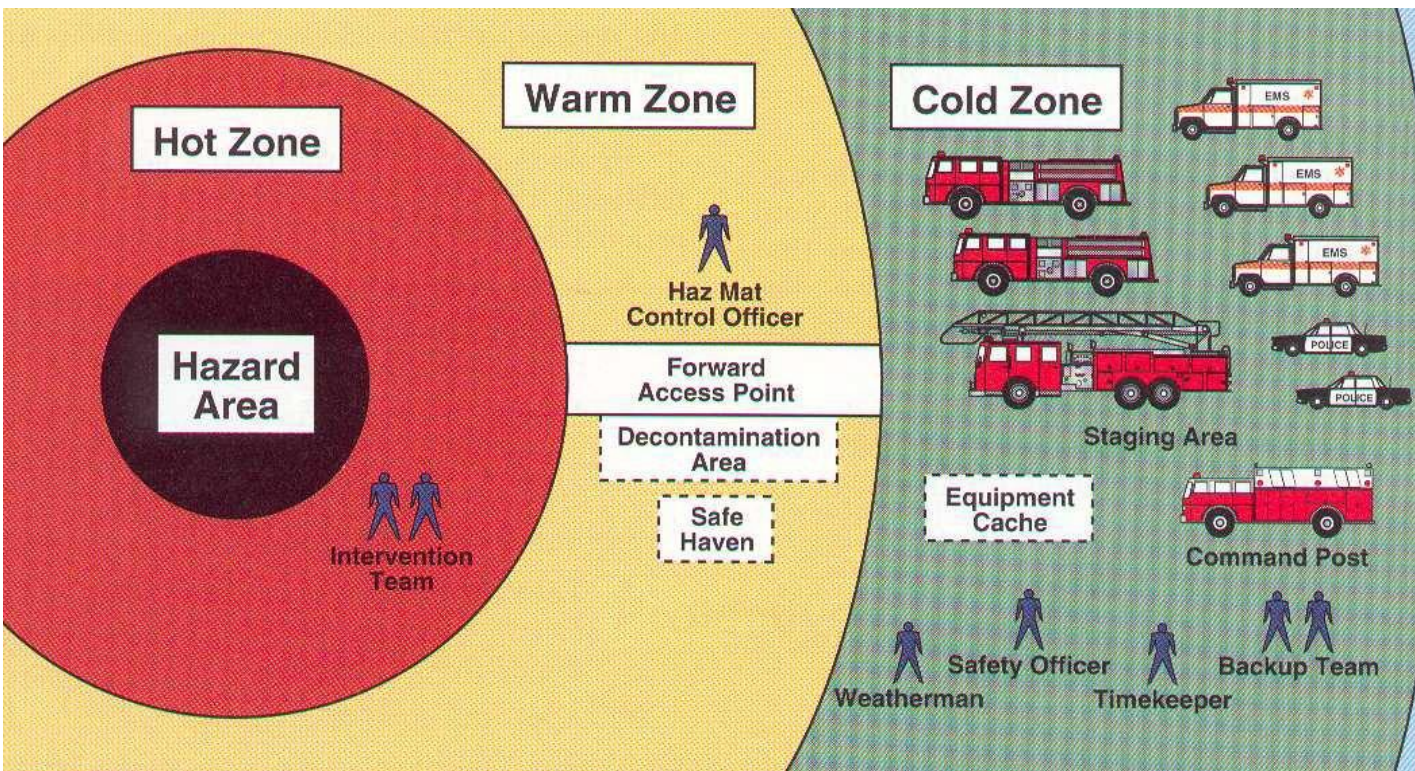
VIII. Personal Protective Equipment:

1. Hazard Assessment required
2. Training required before initial assignment and use
3. Only used for the purpose for which it is designed
4. PPE properly fitted, damaged or ill-fitting PPE replaced as necessary

IX. Command Structure

1. The senior emergency response official responding to an emergency shall become the individual in charge (Incident Commander or IC) of a site-specific Incident Command System (ICS). All emergency responders and their communications shall be coordinated and controlled through the Incident Commander, assisted by the senior official present for each employer.
2. Incident Commanders assume control of the incident scene beyond the First Responder Awareness Level and shall receive at least 24 hours of training equal to the First Responder Operations Level.

X. Decontamination Procedures:



1. Emergency (Gross) decontamination is the rapid decontamination of personnel inadvertently exposed to hazardous materials or who are in distress.
 - a. Responder safety is main priority.
 - b. Utilized when no other materials are available.
2. Site Specific decontamination procedures shall be developed, communicated to employees and implemented before any employees or equipment may enter areas on site where the potential for exposure to hazardous substances exists. See above diagram for location of decontamination area in the warm zone.
3. All employees leaving a contaminated area shall be appropriately decontaminated. All contaminated clothing and equipment leaving a contaminated area shall be appropriately disposed of or decontaminated.

4. Decontamination procedures shall be monitored by the site safety and health supervisor to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies.

5. Decontamination shall be performed in areas (warm zone) that will minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment.

6.. PPE and equipment shall be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness. Employees whose non-impermeable clothing becomes wetted with hazardous substances shall immediately remove the clothing.

7. Methods of Decontamination;

- a. Dilution
- b. Absorption
- c. Degradation
- d. Isolation
- e. Neutralization
- f. Disposal

8. Unauthorized employees shall not remove protective clothing or equipment from change rooms.

9. Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, they shall be provided and meet the requirements of 29 CFR 1910.141.

XI. Emergency Response Guidebook:

1. PHMSA's Emergency Response Guidebook (ERG) can be used in conjunction with placards and labels found on the transport vehicles and containers. **It is designed to be used within the first 15 minutes of the emergency response situation.**

2. The Emergency Response Guidebook provides general information about various hazardous materials and should be used until more specific data is obtained.

55. HAZARDOUS WASTE & EMERGENCY RESPONSE PLAN POLICY

Cox Energy, Industrial Coatings & Cleaning, LLC

Hazardous Waste & Emergency Response Plan

SPILL PREVENTION:

I. Hazardous Substance Management: All hazardous substances, including chemical wastes, are to be managed in a way that prevents release. The following general requirements are to be followed. They include:

A. Employee Training (General)

- Training shall be based on the duties and function to be performed by each responder in an emergency response situation. The skill and knowledge levels required for all new responders, those hired after the effective date of the standard, (CFR 1910.120) shall be conveyed to them through training before they are permitted to take part in actual emergency operations in the event of an incident. All employees shall be given training at the First Responder Awareness level as a minimum. The company shall provide training on what responders in the organization must do in an emergency.

This training shall be done before an employee is assigned to the job.

B. Container Management:

- a. All hazardous substance containers must be in good condition and compatible with the materials stored within.
- b. All hazardous substance containers must be accessible and spacing between containers must provide sufficient access to perform periodic inspections and respond to releases.
- c. Empty hazardous substance containers (drums) must have all markers and labels removed and the container marked with the word 'empty'.
- d. Any spills on the exterior of the container must be cleaned immediately.
- e. Flammable materials stored or dispensed from drums or totes must be grounded to prevent static spark.
- f. Do not overfill waste drums. 4" of headspace must remain to allow for expansion.

C. Good Housekeeping:

- a. All hazardous substances must be stored properly to minimize the likelihood for a spill occurring. Chemicals stored by the company shall be kept in closed containers and not exposed to potential stormwaters, and, if possible, inside buildings or under cover.
- b. Store hazardous substances not used daily in cabinets, or in designated areas;
- c. All chemicals that are transferred from larger to smaller containers must be

transferred by use of a funnel or spigot.

- d. All hazardous substance containers should be closed while not in use;
- e. Use drip pans or other collection devices to contain drips or leaks from dispensing containers or equipment;
- f. Implement preventative maintenance activities to reduce the potential for release from equipment;
- g. Immediately clean up and properly manage all small spills or leaks;
- h. Periodically inspect equipment and hazardous substance storage areas to ensure leaks or spills are not occurring;
- i. Use signage to identify hazardous substance storage or waste collection areas;
- j. Keep all work areas and hazardous substance storage areas clean and in good general condition.

D. Secondary containment:

- a. Store all bulk chemicals (≥ 55 gallons) within appropriate secondary containment, or any sized chemical if there is a potential for release to the environment.
- b. Secondary containment should be checked periodically, and any spills identified in secondary containment must be immediately cleaned up and removed.

E. Marking/labeling:

- a. Ensure all hazardous substances, including chemical wastes, are properly marked and labeled in accordance with all federal, state and local regulations.
- b. Ensure that hazardous substances transferred to small containers are marked with the chemicals name (example- "Isopropyl Alcohol") and hazard (example- "Flammable").

II. Employee Training: Employees designated as First Responders shall be trained at the First Responder Operations Level. All affected company employees shall be trained on the appropriate procedures to be followed in the event of a spill. Training shall include, at a minimum, the materials available for use, proper waste disposal, and the communication procedures the company utilizes. In addition, the following training may apply.

A. First Responder Operations Level - First responders at the operations level respond to releases or potential releases of hazardous substances as part of the initial response to the site. Their purpose is to protect nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without 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 operations level must receive at least eight hours of training or have sufficient experience to demonstrate competency in the areas, as listed, as well as those listed for the awareness level.

B. Training shall include a review of the spill prevention and emergency response plan, and a review of location and use of emergency response equipment, the proper handling of hazardous substances; spill prevention practices, and emergency response procedures. The training shall be conducted by instructors that have the training and/or academic credentials and instructional experience to demonstrate competency. The training shall be refreshed annually.

C. A designated licensed HAZMAT Contractor shall be retained for spill remediation and clean-up.

III. Hazardous Substance Inventory: An inventory shall be maintained for all hazardous substances stored in quantity (<55 gallons), and/or list of locations where non- bulk hazardous substances are stored (flammable lockers- shop floor, etc.).

IV. Spill Response Equipment: Spill response equipment shall be maintained and located in areas where spills are likely to occur, are readily available and easily accessible. Spill kits are to provide adequate response capabilities to manage any anticipated or potential spill or release. The following general requirements are to be followed: They include:

- A. Stock spill clean up kits that are compatible with the hazardous substances stored on site;
- B. Locate spill kits in areas where spills are likely to occur (loading docks, chemical storage areas, locations where hazardous substance are being transferred);
- C. Spill kits should be sized to managing an anticipated release (spill equal to the largest container);
- D. Emergency response equipment should be inspected periodically to ensure that the spill kit is complete.

V. Emergency Response Plan:

The Emergency Response Plan is the facility specific plan for dealing with emergencies and shall be implemented immediately whenever there is a fire, explosion, or release of a hazardous substance that threatens human health or the environment. Emergency planning requirements include pre-emergency planning, emergency recognition and prevention, coordination with outside parties, personnel roles and responsibilities, lines of authority, communications, safe evacuation distances, places of refuge, accounting for personnel, training and drills, and after action analysis. The emergency response plan shall be reviewed and immediately amended whenever:

- A. The plan fails in an emergency;
- B. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that increases the potential for fire, explosions, or release of a hazardous substance;
- C. The list of emergency contacts change; or
- D. The list of emergency equipment changes.
- E. The plan shall be in writing & available for inspection by employees, their representatives & OSHA.

VI. Response Actions in the Event of a Spill or Release:

1. In the event of a hazardous substance spill or release, immediately take the following measures to keep the spill from entering sewer or storm drains, spreading off-site, or affecting human health. In all cases caution and common sense must be maintained with the primary goal being to prevent and/or limit personal injury. The senior official at an emergency response incident is the most senior official on the site who has the responsibility for controlling operations at the site. Spills are to be reported immediately to company supervision. Supervision shall report to environmental authorities the type of chemical spilled and the quantity, when required to do so by regulatory or statutory requirements.

Stop, contain, and clean up the chemical spill if:

- A. The spilled chemical and its hazardous properties have been identified;
- B. The spill is small and easily contained;
- C. Responder is aware of the chemicals' hazardous properties.

2. If a spill or release cannot be controlled or injuries have occurred due to the release the following procedures should be implemented:

- A. Summon help or alert others of the release;
- B. Evacuate immediate area, and provide care to the injured- Call 911;
- C. If potential fire or explosion hazards exist initiate evacuation procedures- Call 911;
- D. Respond defensively to any uncontrolled spills:
- E. Use appropriate personal protective equipment when responding to any spill;
- F. Attempt to shut off the source of the release (if safe to do so);
- G. Eliminate sources of ignition (if safe to do so);
- H. Protect drains by use of adsorbent, booms or drain covers (if safe to do so).
- I. Notify onsite emergency contact(s);
- J. Notify other trained staff and/or emergency response contractor to assist with the spill response and cleanup activities;
- K. Coordinate response activities with local emergency personnel (fire department);
- L. Be prepared to provide SDS information to fire department, EMT, hospital or physician;
- M. Notify appropriate agency if a release has entered the environment;

Emergency response employees who exhibit signs or symptoms which may have resulted from exposure to hazardous substances during the course of an emergency shall be provided with medical consultation.

3. Evacuation Procedures:

In the event of a hazardous substance release that has the potential for fire, explosion or other human health hazards the following procedures will be implemented:

- A. Facility staff shall be notified of evacuation by one or more of the following method(s): Verbal, Intercom, Portable Radio, and/or Alarm.
- B. Notification to emergency services shall be performed- Call 911.
- C. Facility staff shall follow predetermined evacuation routes and assemble at designated areas. Evacuation maps should be displayed throughout the facility.
- D. Individuals responsible for coordinating evacuations must confirm if the business has been completely evacuated.
- E. Facility staff shall be made familiar with evacuation procedures during new employee orientation, and annual trainings thereafter.
- F. Designated emergency response contacts will coordinate all activities with outside emergency personnel.

4. Spill Cleanup and Disposal:

In the event of a hazardous substance release spill cleanup materials are to be properly characterized to determine if it designates as a Hazardous Waste. The designated onsite emergency contact, with the assistance of the designated hazardous waste disposal vendor shall determine the wastes status prior to disposal.

5. Reporting a Release:

If a hazardous substance spill has been released to soil, surface water, drains or air, notifications to the appropriate Federal, State, and local authorities (within 24-hours) must be performed:

When reporting a release prepare to provide the following information (use spill report form):

- A. Your name and telephone number from where you are calling; Exact address of the release or threatened release;

- B. Date, time, cause and type of incident (fire, air release, spill, etc.) Material and quantity of the release, to the extent known; Current condition of the facility;
- C. Extent of injuries, if any; and
- D. Possible hazards to the public health and/or environment outside of the facility.

VI. Medical Surveillance:

Members of an organized and designated HAZMAT team and hazardous materials specialist shall receive a baseline physical examination and be provided with medical surveillance.

Any emergency response employees who exhibit signs or symptoms which may have resulted from exposure to hazardous substances during the course of an emergency incident either immediately or subsequently, shall be provided with medical consultation. If employees are members of a HAZMAT team, baseline physical exams and medical surveillance must be provided. If an employee shows signs or symptoms of exposure to hazardous materials, they must be given medical consultation.

56. HAZARDOUS
COMMUNICATION
PROGRAM
(HAZCOM) PLAN
POLICY

Cox Energy, Industrial Coatings & Cleaning, LLC

HAZCOM PLAN

I. Purpose:

1. The purpose of this program is to help workers identify potentially hazardous chemicals found in the workplace, know where to find information on the chemicals, know how to read and understand important information provided by the manufacturer on working safely around these chemicals, know what to do if inadvertent contact with the chemical is made and who to contact if emergency assistance is needed. This Hazard Communication Program is written for and implemented by Cox Energy, Industrial Coatings & Cleaning LLC to comply with the requirements of OSHA's General Industry Standard 29CFR191 0.1200 and OSHA's Construction Standard 29CFR1926.59.

- II.** The Hazard Communication Standard is a system utilized by employers to ensure that all affected employees are kept informed of the types of chemicals in their workplace, the hazardous properties of the chemicals with which they will work and both safe handling procedures and measures to take to protect themselves to work safely with these chemicals.

- III.** A written hazard communication program has been developed, implemented, and is maintained for each workplace/job-site that describes how labels & other forms of warning, safety data sheets, & employee information will be met.

1. Cox Energy, Industrial Coatings & Cleaning LLC assures that this information is readily accessible to employees by use or creation of the following:

- Written Hazard Communication Program,

- Project-specific chemical inventories (list) developed on each project,
- Collection and archiving in a central repository of Safety Data Sheets (SDS's) of all known hazardous chemicals used. Each chemical on the list must have the same name as the one shown on its SDS.
- The program also includes the methods the employer will use to inform employees of the hazards of non-routine tasks. Training employees on non-routine tasks, such as the cleaning of equipment, and informing workers on the hazards associated with chemicals contained in unlabeled systems in their work areas if that should occur.

IV. Policy:

1. To ensure that information about the dangers of all hazardous chemicals used on the jobsite is known by all affected employees, the following Hazard Communication Program has been established. Under this program, employees shall be informed of the contents of the OSHA Hazard Communication Standard, the hazardous properties of the chemicals with which they work, safe handling procedures and measures to take to protect themselves from these chemicals.
2. Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.

3. This program applies to all construction activities and jobsites where employees may be exposed to hazardous chemicals under normal working conditions.

V. Responsibility:

1. Cox Energy, Industrial Coatings & Cleaning LLC is responsible for development and changes to this Hazard Communication Program. Cox Energy, Industrial Coatings & Cleaning LLC management teams are responsible for implementing the program on each individual project. Each project team will implement a project program that includes: a project-specific Chemical Inventory (“Repository”), access to SDS’s, provisions for training, requirements for the supply and use of personal protective equipment (PPE), emergency response requirements, requirements for hazards of non-routine task(s), methods for informing other employers and posting requirements.

VI. Safety Data Sheets:

The Hazard Communication Program integrates the newly formatted Safety Data Sheets (SDS) formerly known as Material Safety Data Sheets or (MSDS). The new SDS's will be in the required uniform format which will include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restriction on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition / information on ingredients include information on chemical ingredients; trade secrets claims.

Section 4, First-aid measures includes important symptoms / effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and clean-up.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls / personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties list the chemical's characteristics.

Section 10, Stability and reactivity list chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information.

Section 13, Disposal considerations.

Section 14, Transport information.

Section 15, Regulatory information.

Section 16, Other information, includes the date of preparation or last revision.

SDSs shall be maintained and readily accessible in each work area. SDSs can be maintained at the primary work site. However, they shall be made available in case of an emergency. SDS's must be made available, upon request, to employees, their designated representatives, the Assistant Secretary & the Director.

VII. Employee Access to Information:

1. This written Hazard Communication Program is available, upon request, to employees, their designated representatives, etc. (Collective Bargaining Agent, Physicians).
2. Copies of SDS's for hazardous substances to which employees of this company may be exposed shall be kept in the SDS Library

located at each jobsite. The Superintendent will be responsible for obtaining and maintaining the SDS system for the project.

3. The Supervisor shall review incoming data sheets for any new significant health / safety information and will ensure that any new information is passed on to affected employees and all affected subcontractors on the jobsite.
4. The Hazard Communication Program shall have specific methods for providing other employer information concerning hazardous chemicals at job sites, methods of providing SDS sheets, methods of precautionary measures to be taken & methods of providing information on labeling systems. Where employees must travel between work places during a work shift (multi job sites), the written program may be kept electronically and made available to the employees via laptop computer, I-Phone, or I-Pad.

VIII. Labeling:

1. The Hazard Communication Program integrates the newly formatted container labeling system. New labels include pictograms, a signal word, hazard and precautionary statements, the product identifier and supplier identification.
2. Materials received at the jobsite are required to be properly labeled. If labels are not provided, suppliers must be contacted by the superintendent for the specified labels. Information contained on labels must not conflict with federal, state, or local laws and / or regulations in labeling requirements. These labels shall provide the following:
 - a. Name, Address and Telephone Number of the chemical manufacturer and / or importer.
 - b. Product Identifier.
 - c. Signal Word (Danger or Warning)
 - d. Hazard Statement(s)
 - e. Precautionary Statement(s)
 - f. Pictogram(s)

Pictograms



HEALTH
HAZARD



GAS
CYLINDER



FLAME
OVER
CIRCLE



FLAME



CORROSION



ENVIRONMENT



EXCLAMATION
MARK



EXPLODING
BOMB



SKULL
&
CROSSBONES

The final rule requires containers shipped six months after the information is available to be labeled correctly.

Labels must not be removed and shall be replaced if illegible. All containers of chemical products, including laboratory bottles, solvent cans and dispensers must be labeled. Only those chemicals that can be classified as “immediate use” are exempt from the labeling procedures described above. (Immediate use is defined as the hazardous chemicals under control of and used only by the person who transfers it from the labeled container and only within the work shift in which it is transferred). ALL CHEMICALS ARE TO BE KEPT IN THEIR ORIGINAL CONTAINERS IF AT ALL POSSIBLE.

IX. Training:

1. Employees shall be trained on the dangers of the hazardous chemicals they work with. This training must be given when the employee starts work and when a new chemical is used in the workplace. Hazard Communication Program training will address the following areas:
 - Overview of the Hazard Communication Program
 - Protocol for newly introduced chemicals
 - Availability and location of the Chemical Repository
 - Inform employees of any operation in their work area where hazardous chemicals are present.
 - Location and availability of the written Hazard Communication Program for the project.
 - Location and availability of the SDS for the project.
 - Location of the project-specific chemical inventory (list).
 - Physical and health effects of the hazardous chemicals.
 - Methods and observation technique used to determine the presence of or the release of hazardous chemicals in the work area.
 - How to lessen or prevent exposure to hazardous substances through usage of engineering controls, work practices and / or the use of personal protective equipment.
 - Steps the company has taken to lessen or prevent exposure to these chemicals.
 - Emergency and first aid procedures to follow if employees are exposed to hazardous substance(s).
 - How to read labels and review SDS to obtain appropriate hazard information

. • Have each employee trained in the above and sign the Safety Training Form.

• Conduct an annual review of the Hazard Com Protocols. When new hazardous chemicals are introduced to the job-site, the Cox Energy, Industrial Coatings & Cleaning LLC Management Team will review the above items as they relate to the new chemical. Note: It shall be the responsibility of all sub-contractors to provide the appropriate SDS's and Chemical Inventory List to Cox Energy, Industrial Coatings & Cleaning LLC. project management for all hazardous chemicals being used by their company at the jobsite, Availability and Location of the Chemical Repository, Instruct all employees and site workers on where the Chemical Repository is located and that the information in the Chemical Repository is always available to any interested individual during working hours.

2. Employers who produce, use, or store hazardous chemicals in such a way that the employees of other employers may be exposed shall ensure the Hazard Communication program includes the following: a) The methods the employer will use to share SDS, b) The methods the employer will use to inform other employers of any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies; and c) The methods the employer will use to inform other employers of the labeling system used in the workplace.

X. Recordkeeping:

1. Recordkeeping of the project-specific Hazard Communication Program will consist of the following:
 - All SDS's of known chemicals on the jobsite. Cox Energy, Industrial Coatings & Cleaning shall have an SDS for each chemical used. If an SDS is not provided with the hazardous substance, then one shall be located.
 - Requests for any SDS not furnished.
 - Records of employee training and employee acknowledgement.

- Records of any employee over-exposure to a hazardous chemical.
- Records of any environmental testing program(s) with all affected employees and maintain a record of those in attendance.

57.

ENVIRONMENTAL SUSTAINABILITY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC ENVIRONMENTAL MANAGEMENT & SUSTAINABILITY POLICY

Cox Energy, Industrial Coatings & Cleaning, LLC (“Cox Energy”) is a construction company whose primary activities include a broad range of construction services in the pipeline, and heavy and highway industries.

Cox Energy is committed to the development, implementation, execution, and maintenance of its environmental procedures in providing a high-quality environment in the pipeline, and heavy and highway construction industry which meet the expectations of the client, Environmental Authorities, and Environmental and Community Group.

We recognize that impacts on the environment in pipeline, and heavy and highway construction industry relate not only to the process of construction but also to the design and subsequent use of roads, bridges, and pipelines constructed.

Cox Energy affirms its commitment to applying sustainable development principles to all facets of the pipeline, and heavy and highway construction process and in minimizing the impact on, and pollution of, the environment during the construction process.

Cox Energy’s objectives are to:

- Identify and manage risks for work activities to minimize impacts on the environment; and
- Ensure environmental awareness and encourage respect for the environment by all staff, subcontractors, and supplies

It is our policy to address environmental issues and comply with relevant environmental legislation and regulations. We employ socially acceptable and cost-effective strategies to mitigate threats to the environment and provide protection to clients, the general public, and the company’s employees.

To achieve these goals, Cox Energy will implement, maintain, and continually improve its Environmental Management System in accordance with all applicable laws.

We plan our work and utilize our products and materials in such a way as to minimize environmental impacts in production, use, disposal, and construction and demolition techniques.

We take an active interest in the prevention of pollution (noise, air, and ground) through the adoption of processes, practices, materials, equipment and products that avoid, reduce, or control pollution.

All employees, contractors, consultants, clients and the like are made aware of these responsibilities and are educated with regard to the practical application of our Environmental Policy.

58.

ENVIRONMENT,
SOCIAL &
GOVERNANCE
(ESG) POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

ENVIRONMENT, SOCIAL & GOVERNANCE (ESG) POLICY

SCOPE

This Environmental, Social & Governance Policy (ESG Policy) applies to all employees and operations of Cox Energy, Industrial Coatings & Cleaning, LLC (“Cox Energy”).

PURPOSE

The purpose of this ESG Policy is to outline Cox Energy’s commitment to environmental, social & governance aspects across the organization. Cox Energy recognizes its duty to behave responsibly in our business activities and towards those employees and clients whom its actions affect now and in the future.

PRINCIPLES

These corporate principles express how we view our responsibilities and how they may apply practically in the day-to-day running of Cox Energy as a business. It is important that these principles are applied to ensure we can reasonably expect others with whom we do business to apply similar principles.

ENVIRONMENTAL

It is Cox Energy’s policy to minimize the negative impact on the environment arising from our business activities and improve the quality of our environment. This includes but is not limited to:

1. Managing all potential pollutants to minimize environmental impacts and protect conservation areas;
2. Improve efficiency of resource use such as water, energy and materials;
3. Reduce waste and implement reuse and recycling opportunities;
4. Integrate sustainability principles into projects, including design and construction; and
5. Understanding and mitigating the risks associated with climate change through

managing our carbon emissions and building resilience across our assets and operations.

SOCIAL

- A. It is Cox Energy's policy to maintain positive relationships with our employees and the community by:
1. Fostering a close relationship with our staff and employees;
 2. Providing a supportive, healthy and safe working environment;
 3. Adopting policies and practices which encourage an appropriate work/life balance;
 4. Developing our staff and employees through training, professional development conferences (staff) and by undertaking further relevant study;
 5. Not contributing to any practice where there may be potential abuse of human rights or exploitation of any kind;
 6. Seek to ensure the safety and security of employees, equipment, data and systems; and
 7. Support the community through investment in events, sports, art, culture and community organizations.
- B. It is Cox Energy's policy to promote greater diversity in hiring, and promotions within the company. We do this by:
1. Hiring individuals based on merit, qualifications and abilities. The company is an equal employment opportunity employer to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability, or status as a Vietnam-era or special disabled veteran in accordance with applicable state and federal laws.
 2. Applying the company's diversity policy to all positions in the company, including executive positions.
 3. Paying equally per employee category regardless of race, color, religion, sex, national origin, age, disability, or status as a Vietnam-era or special disabled veteran, or any other diversity.
 4. Fairly compensating all employees regardless of race, color, religion, sex, national origin, age, disability, or status as a Vietnam-era or special disabled veteran, or any other diversity.
 5. Currently there are not legal requirements in the company's jurisdiction of operation regarding ratios or quotas of employment of indigenous persons. The company will keep abreast of legal requirements should there be any in the future and comply with the same.

- C. It is Cox Energy's policy to prevent Modern Slavery within the company by absolutely prohibiting child labor, forced or compulsorily labor (Modern Slavery) by withholding travel documents, bank cards, and/or similar practices.
- D. It is Cox Energy's policy to prevent the use of Conflict Minerals by prohibiting the sourcing of raw materials from areas of military conflict that is sold to further support the conflict (Conflict Minerals).
- E. It is the company's policy to create a Zero-Tolerance Workplace Violence Free environment. No workplace violence will be tolerated. The company will not condone nor permit any type of workplace violence of its employees. All employees, including supervisors and managers, will be subject to discipline, up to and including termination, for any act of workplace violence which they commit. It is the responsibility of the employee to immediately report any workplace violence, in writing, to his or her supervisor. If the employee's immediate supervisor is the source of workplace violence, the employee is to report the problem immediately to the supervisor's superior. When a supervisor or manager receives a workplace violence complaint, he is to carefully investigate the matter. An employee who is not satisfied with the results of the investigation should then go to the supervisor's superior. No employee will be subject to any form of retaliation or discipline for pursuing a workplace violence complaint.
- F. It is the company's policy to create a Zero-Tolerance Workplace Sexual Harassment Free environment. Employers interested in human dignity and protection of their employees are particularly concerned about the possibility of employee harassment, whether sexual, racial, ethnic, or other type. Harassment in any form- verbal, physical, or visual- is strictly against company policy and will result in corrective action. It is illegal and against Cox Energy's policy for any employee, male or female, to harass another employee in the following manner:
 - 1. Making unwelcome sexual advances or favors or other verbal or physical conduct of a sexual nature, a condition of any employee's employment;
 - 2. Using an employee's submission to, or rejection of such sexually harassing conduct as the basis for, or as a factor in any employment decision affecting the individual; or
 - 3. Otherwise creating an intimidating, hostile or offensive work environment by such sexually harassing conduct. Defining sexual harassment precisely is not easy but it certainly includes slurs, threats, derogatory comments, unwelcome jokes, exposure to sexually oriented literature or pictures, teasing or sexual advances, and other similar verbal or physical conduct. CEICC will not condone nor permit any sexual harassment of its employees. All employees, including supervisors and managers, will be subject to severe discipline, up to and including discharge, for any act of sexual harassment which they commit. An employee who believes that he/she is or may be subjected to objectionable conduct must report it immediately in writing. Do not allow an inappropriate situation to continue without reporting it, regardless of who is creating the situation. No employee is exempt from this policy. It is the responsibility of the employee to immediately report any sexual harassment, in writing, to his/her supervisor. If the employee's immediate supervisor is the cause of the harassment, the

employee is to report the problem immediately to the supervisor's superior. When a supervisor or manager receives a sexual harassment complaint, he/she is to carefully investigate the matter. Each member of management is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. However, if after investigating any complaint of harassment or unlawful discrimination, the company determines that the complaint is not bona fide or that an employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or provided the false information. Furthermore, no employee shall be subject to any form of retaliation or discipline for pursuing a legitimate sexual harassment complaint.

- G. It is the company's policy to create a Zero-Tolerance Workplace Discrimination Free environment. Cox Energy maintains a policy of nondiscrimination with employees and applicants for employment and advancement opportunities. Employment decisions will be based on merit, qualifications and abilities. CEICC provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability, or status as a Vietnam-era or special disabled veteran in accordance with applicable state and federal laws. This policy applies to all terms and conditions of employment including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training. CEICC expressly prohibits any form of unlawful employee discrimination and/or harassment based on race, color, religion, sex, national origin, age, disability, status as a Vietnam-era or special disabled veteran or status in any group protected by state, federal or local law. This policy governs all aspects of employment, including employee selection, promotion, discipline, termination, compensation and eligibility of benefits.
- H. It is Cox Energy's policy to provide vocational and related training to employees. We do this by offering and paying for training related to work activities.

GOVERNANCE

It is Cox Energy's policy to maintain best practice governance standards by:

1. Understanding that strong corporate governance and effective management are vital to the successful implementation of our corporate objectives;
2. Maintaining diligent corporate governance, compliance, and risk management;
3. Acting with integrity to maintain and build trust with all our employees and clients;
4. Continually measuring, reviewing, and improving the sustainability performance defined by our objectives and targets;
5. Demonstrating leadership through promoting the company's commitment to sustainability and encouraging our employees and clients in undertaking sustainable practices;
6. Conducting reviews/audits of Cox Energy's internal controls at least annually; and

7. Ensuring our policies and procedures are designed to maintain resiliency and ongoing performance of our business and conform to best practice.

59. CLIMATE RESILIENCE POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

CLIMATE RESILIENCE POLICY

SCOPE

This Climate Resilience Policy applies to all employees and operations of Cox Energy, Industrial Coatings & Cleaning, LLC (“Cox Energy”).

PURPOSE

The purpose of this Policy is to outline Cox Energy’s commitment to ensure the ability to withstand and recover from climate-related disruption across the organization. Cox Energy recognizes that the potential impact of climate change on its business operations as the first step toward effective preparation.

CLIMATE-RISK ASSESSMENTS

Cox Energy is committed to conducting a comprehensive climate-risk assessment so that it is prepared for changes that occur due to climate-related issues. Cox Energy is to perform, at a minimum, the following:

I. INCORPORATE SUSTAINABILITY INTO BUSINESS STRATEGY

Cox Energy recognizes that a core component of Cox Energy’s corporate strategy is climate change response. Cox Energy shall implement the following into its business’ strategy:

1. Set Science-Based Targets: Science-based targets provide a clear pathway for reduction and help enhance corporate credibility such as commitment to reducing greenhouse gas emissions in alignment with the US Government goals.
2. Invest in Renewable Energy: Transitioning to renewable energy sources such as solar, wind or other clean energy technologies to assist in reducing emissions while lowering long-term energy costs.
3. Enhance Supply Chain Resilience: Engage suppliers committed to developing more sustainable practices and diversify supply chains to reduce vulnerability to climate-related disruptions. Identify and assess the potential risks and vulnerabilities of extreme weather events, such as floods, hurricanes, and heatwaves, could affect facilities, and

employee safety. Also, assess the potential impact of these risks on operations and supply chain processes, such as transportation, raw materials, and production.

a. Diversify supply chain by:

- i. Identify and diversify suppliers geographically and by type to reduce reliance on a single source or region;
- ii. Build relationships with suppliers in different locations to have backup options in case of disruptions; and
- iii. Optimize inventory levels to ensure adequate supplies during and after climate-related events.

b. Enhance Supply Chain Resilience by:

- i. Implementing sustainable practices:
- ii. Adopting eco-friendly processes, reduce waste, and source materials responsibly to mitigate environmental impacts and build resilience.
- iii. Investing in renewable energy:
- iv. Transitioning to renewable energy sources to reduce emissions and energy costs.
- v. Enhancing infrastructure:
- vi. Strengthening infrastructure to withstand extreme weather events, such as constructing flood barriers or improving transportation networks.

II. ENCOURAGE STAKEHOLDER COLLABORATION

Cox Energy recognizes that collaboration is essential in battling climate change effectively. In an effort to further collaboration, Cox Energy will:

1. Engage Employees: Promote a culture of sustainability by involving employees in initiatives, training programs, and decision-making processes related to climate action.
2. Collaborate with Other Businesses: Work in tandem with other companies, and industry groups to share best practices, drive innovation, and advocate for stronger climate policies.
2. Communicate Transparently: Disclose climate-related strategies, progress, and challenges to stakeholders, including investors, customers, and communities. Transparency and consistency build trust and accountability. Also, consider how public perception and consumer preferences may shift in response to environmental practices.
3. Strengthen Governance and Communication: Analyze the implications of regulatory changes, shifts in market demand, and the transition to a low-carbon economy by:
 - a. Regularly review and update policies and procedures to reflect the evolving risks of climate change.
 - b. Communicate with suppliers, stakeholders, and employees about the organization's climate resilience plans.
 - c. Ensure that climate-related risks are part of overall strategy reviews and risk management policies.

III. CORPORATE INNOVATION FOR CLIMATE CHANGE SOLUTIONS

In an effort to nurture a culture of innovation to create and promote products and services that address climate change, Cox Energy shall perform the following to the extent applicable to its current business:

1. Developing Green Products: Invest in research and development of eco-friendly products that minimize environmental impact and appeal to a growing consumer demand for sustainability.
2. Implementing Circular Economy Practices: Shift from a linear model of production and consumption to a circular one, where resources are reused, recycled, and/or recovered. This not only reduces waste but can also lower costs and generate new revenue streams.
3. Leverage and Embrace Technology and Collaboration: Utilize technology, such as artificial intelligence and big data to bolster efficiency, optimize resource use, and reduce emissions. Analyze the implications of new technologies and collaborate with others by:
 - a. Use advanced technology to improve supply chain visibility and collaboration with vendors and stakeholders.
 - b. Develop digital tools to track supply chain performance, identify vulnerabilities, and monitor climate-related events.
 - c. Collaborate with other businesses and organizations to share best practices and build collective resilience.

IV. ANTICIPATE REGULATORY CHANGES

Cox Energy recognizes that as governments around the world enact stricter climate policies, corporations must stay ahead of regulatory changes. Cox Energy will do this by:

1. Monitoring Legislation: Stay informed about current and upcoming regulations and court rulings related to emissions, energy use, and sustainability practices at local, state, and federal levels.
2. Advocating for Policy Change: Engage in policy advocacy to endorse regulations that support climate resilience and sustainable business practices, ensuring that corporate interests align with broader societal goals.

V. EMPOWER CLIMATE-ADAPTATION STRATEGIES

Along with mitigation efforts, Cox Energy will prepare for the inevitable impacts of climate change through adaptation strategies such as:

1. Infrastructure Resilience: Invest in robust infrastructure that can withstand climate-related disruptions. For example, upgrading facilities and incorporating climate resilience into design and construction processes.
2. Emergency Preparedness Plans: Establish comprehensive emergency response plans to address potential disasters, ensuring business continuity and employee safety.

VI. EMBRACE SUSTAINABILITY AND STAY COMPETITIVE

Cox Energy recognizes that as climate change reshapes business as usual, it should adopt proactive and strategic approaches to prepare for its impact. By conducting thorough assessments, integrating sustainability into core strategies, fostering innovation, collaborating with stakeholders, staying ahead of regulations, and investing in adaptation measures, Cox Energy cannot only mitigate risks but also seize opportunities in a rapidly evolving market. Embracing these strategies will not only help advance a more sustainable future but also enhance long-term business resilience and competitiveness.

60. GREENHOUSE GAS (GHG) EMISSIONS POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

GREENHOUSE GAS (GHG) EMISSIONS POLICY

I. PURPOSE

The United States Environmental Protection Agency (USEPA) defines greenhouse gases as those that trap heat in the atmosphere, preeminently carbon dioxide, methane, nitrous oxide, and fluorinated gases. For over a century, scientists have known that certain gases in the atmosphere create a greenhouse effect. Over the last 10,000 years, the concentration of these natural GHGs has remained relatively stable, maintaining the global average ambient temperature of 14–15°C. (approximately 58–60°F.) Without this effect, the global temperature would average around -18°C. (approximately 0° F.) Since the beginning of the Industrial Revolution, however, the concentration of humans caused GHGs to increased markedly, primarily through the burning of fossil fuels. In turn, this increase in concentration will disrupt the climate system, although the specific impacts and the magnitude of these impacts are debated within the social and scientific communities. Furthermore, approximately 1/3 of GHG emissions were generated by the transportation sector, which is the largest share of GHG emissions. GHG emissions from transportation primarily come from vehicle fossil fuel uses. Over 90% of the fuel used for transportation is petroleum-based, which includes gasoline and diesel. Electricity production comprised approximately ¼ of GHG emissions, and approximately 20% of emissions were generated from industry.

Climate change may create significant costs and extraordinary future risks to society and natural systems. Climate change puts the well-being of people of all nations at risk. Continued increases in GHG concentrations will heighten risks to public health and safety. Delays in action may increase costs and foreclose options to reduce the risk to future generations.

In light of that background, the purpose of Cox Energy, Industrial Coatings & Cleaning, LLC's (Cox Energy) Greenhouse Gas (GHG) Emission Policy (GHG Policy) is to supports public and private sector strategies and efforts to achieve significant reductions in GHG emissions through the planning, design, construction, renewal, renovation, operation, maintenance, and decommissioning of existing and future infrastructure systems. Cox Energy is committed to reducing environmental impact and contribute to climate action by using this GHG Policy. This policy set strategies for establishing reasonable procedures for monitoring and the reduction of GHG Emissions.

II. SCOPE:

This GHG Policy applies to all employees and operations of Cox Energy.

III. RESPONSIBILITIES AND ACTION PLAN:

All of Cox Energy's management, staff and employees are responsible for implementing this policy.

1. Management shall:
 - a. Establish sustainable plans that promote the reduction of GHG emissions and timely adaptation to the effects of climate change, while maintaining or enhancing natural, economic, and social resources.
 - b. Making cost-effective use of existing and emerging technologies.
 - c. Research and implement new technologies and materials to conserve resources to further improve energy efficiency and reduce GHG emissions.
 - d. Encourage and facilitate the use of lower GHG by emitting energy-generating sources while accounting for the hazards, exposures, risks, and consequences of any energy source.
 - e. Supporting incentives for the short-term development and implementation of high-efficiency and low- or zero-GHG emitting technologies and cost-effective carbon capture and storage of emissions from large stationary sources that cannot easily be replaced or relocated.
 - f. Encourage and support the exchange of information relating to GHG emissions reductions and mitigation strategies in infrastructure development and renewal projects.
 - g. Keep abreast of legal and regulatory requirements:
 - h. Ensure compliance with relevant environmental regulations and standards.
 - i. Involve stakeholders, such as employees, customers, and suppliers, in the development and implementation of the policy.
 - j. Follow all implemented plans.
2. Staff and Employees shall:
 - a. Follow all implemented plans.
 - b. Inform management of any existing and/or emerging technologies that could possibly aid in reduction of GHG emissions.

IV. MEASUREMENT AND MONITORING:

Cox Energy recognizes the importance of measuring and monitoring GHG Emissions and the necessity to reduce the emissions. Cox Energy plan to measure and monitor GHG Emission shall consist of the following:

1. Organizational Boundaries: GHG Emission will be measured in accordance with the control approach and measure total GHG Emissions for the company.

2. Operational Boundaries: Under the GHG Protocol, emissions are categorized into three categories of GHG emissions, called scopes:
 - a. Scope 1: Direct GHG emissions occur from sources that are owned or controlled by the company, for example, emissions from combustion in owned or controlled boilers, furnaces, vehicles, etc.;
 - b. Scope 2: Indirect GHG emissions from consumption of purchased electricity, heat, cooling or steam
 - c. Scope 3 is all the indirect emissions not covered in Scope 2 that are generated through the value chain of the reporting company, including upstream and downstream activities by other supply chain actors.

Cox Energy will measure and monitor Scope 1, Scope 2 and Scope 3 GHG Emissions.

3. Base Year Selection: 2024 is the company's base year selection.
4. Identify GHG Emissions Sources: The following are GHG Emission Sources: vehicles such as cars and trucks; equipment such as excavators, skid steers, bull dozers and forklifts; and office /warehouse equipment such as furnaces, and lighting.
5. Calculation Approach Selection: Cox Energy will calculate GHG emissions by using activity data and emission factors by fuel use. Emission factors are scientifically determined ratios, from researchers or government agencies that connect the amount of GHGs produced to the activity level at the source of the emissions. They are typically given in terms of the weight of GHGs emitted per unit of energy used, the volume of industrial output, distance traveled or other relevant units. The following formulas will be used to calculate GHG Emissions:
 - a. Diesel Fuel: To estimate GHG Emissions from mobile equipment using diesel fuel, Cox Energy will use the following: multiply the total diesel fuel consumption by the appropriate emission factor for diesel fuel, i.e., approximately 10.15 kg of CO₂e per gallon of diesel. For example, if 10 gallons of diesel is used in one hour, then the estimated GHG emissions would be approximately 101.5 kg of CO₂e per hour.
 - b. Natural Gas: To estimate GHG Emission from natural gas, Cox Energy will use the following: multiply the total natural gas fuel consumption by the appropriate emission factor for natural gas, i.e., approximately 0.12 pounds of CO₂e per cubic foot or 117 pounds of CO₂ per million BTU, or 0.12 pounds per cubic foot of natural gas. For example, if 10 cubic feet of natural gas are used, then the estimated GHG emissions would be approximately 1.2 pounds of CO₂e, 1,170 pounds of CO₂ per million BTU or 1.2 pounds per cubic foot.
 - c. Electricity: To estimate GHG Emission from electricity, Cox Energy will use the following: multiply the total electricity fuel consumption by the appropriate

emission factor for electricity, i.e., approximately 461 kg CO₂e per 1,000 kilowatt-hours (kWh), or 0.461 kg CO₂e per kWh of electricity. For example, if 10 kWh of electricity is used, then the estimated GHG emissions would be approximately 4.61 kg of CO₂e.

- d. Other Sources: If other sources are determined, Cox Energy will put in place calculations for GHG Emissions.
- 6. Collect and Calculate: The company will gather data from various sources, such as field operations, office operations, management and employees.

V. TARGET SETTING:

Cox Energy's goal is to reduce GHG Emissions by 3% per year.

VI. REPORTING AND REVIEW:

Cox Energy shall regularly review and update the policy to reflect on changing business circumstances and advancements in technology. Company management will report GHG Emissions at least annually.

61. EMPLOYEE SMOKING POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

EMPLOYEE SMOKING POLICY

Cox Energy is committed to providing the safest and healthiest work environment. Smoking (including electronic cigarettes) is prohibited in all construction sites, and all company owned premises and vehicles, with the exception of outdoor-designated areas.

Project supervision will designate an outdoor Smoking Areas at construction sites as well as company owned premises, in consultation with the Company's health and safety representative, and the owner's safety representatives. The outdoor Smoking Area will be located in a safe space and must be:

- Clearly identified to workers and the public as a smoking area by signs or other effective means;
- Equipped with ashtrays or appropriate receptacles;
- Away from hazardous locations (i.e., fire and/or explosive atmospheres); and
- In compliance with legislation where applicable

62. ZERO
TOLERANCE
FIREARMS/
WEAPONS FREE
POLICY

COX ENERGY INDUSTRIAL COATINGS & CLEANING LLC

FIREARMS/WEAPONS FREE WORKPLACE POLICY

Cox Energy is committed to providing the safest and healthiest work environment. Cox Energy prohibits the possession, use, and transportation of any dangerous or potentially dangerous weapons when working for Cox Energy. This prohibition also applies to all personal vehicles being used in the course of business for Cox Energy, and, except where permitted by applicable U.S. state law, all privately-owned motor vehicles parked on Cox Energy's property or any facility owner's property while working for Cox Energy. In those U.S. states that authorize firearms to remain in personal vehicles, the vehicle must be locked; the stored firearms must be hidden from plain view and be kept within a locked case or container within the vehicle. Personnel licensed to carry firearms or weapons are NOT exempt from this policy.

63. SPOTTER TRAINING POLICY

COX ENERGY INDUSTRIAL COATINGS & CLEANING LLC

SPOTTER TRAINING POLICY

Cox Energy is committed to safety in all aspects of its operations. The purpose of a Spotter is to assist in eliminating or preventing injury and damage.

A Spotter is someone trained to look. He or she is the person who watches out for others as well as themselves and makes sure that vehicles/equipment do not injury people or damage property. Spotters must be used when: backing a vehicle or machinery; entering or moving a vehicle or machinery in a congested area; poor visibility; close proximity; pedestrians/coworkers or other contractors on the surroundings; and lateral, overhead, or other obstructions. In addition, Spotters must be used when the driver/operator does not have full view of the working area and need someone to direct him/her. Also, Spotters are necessary, at a minimum, if there is a possibility of injury and/or property damage.

Spotters and drivers/operators must work together. The operator/driver will discuss the positioning, backing movement and plan with the spotter before proceeding, and the operator/driver shall stop the vehicle/equipment immediately prior to losing sight of the Spotter. When directing the driver/operator, Spotters must stand at the driver's side in order to give an unobstructed view of the entire movement and explain the signals and allow for sufficient stopping and clearance. Spotters will be sure to use the same signals for the same moves. See Standard Spotter Signals diagram below. Hand signals, as opposed to verbal signals, will be used whenever possible. Hand signals are better than verbal signals because noise may interfere with verbal signals. If the driver/operator is unclear at any point of the Spotter's signals, the vehicle/equipment must be stopped immediately. When spotting, Spotters must concentrate on spotting (the task at hand); and must maintain eye contact with the driver/operator even if the Spotter has to change position frequently. If the Spotter needs to stop spotting momentarily for any reason, the Spotter must first make sure that the driver/operator stops the equipment/vehicle.

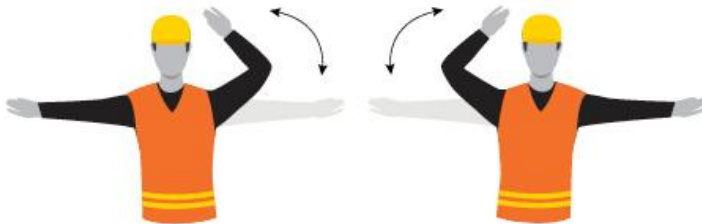
Heavy Equipment is an essential part of most industry around the world. However, statistics indicate that they also present a very significant hazard to people occupying the same workspace since injuries can be severe or fatal as equipment is heavy and powerful. Vehicle/Heavy Equipment Danger Zones include: Blind Spots; Rotating machinery; Swing radius; Travel Path; Approaching the machinery before acknowledging the operator; Non-

essential workers on the area; and Struck by overhead loads falling. The Spotter must make sure no one enters the danger zone while the machinery is in operation. The danger zone is the area around the equipment/vehicle where the operator does not have a full visibility during normal operations. Stay at least ten (10) feet away from all sides of the Machinery, including, front, both sides (left and), back, up and bottom.

All employees working near moving vehicles or equipment, workers must: stay alert at all times; do not distract yourself; keep a safe distance; keep off the equipment unless authorized; watch out for shifting or unstable loads; wear a bright orange vest if you are working near moving vehicles or heavy equipment; and wear reflectorize clothing at night.

SPOTTER HAND SIGNALS

TURN



Point one arm to indicate the direction to turn. Bend monitoring arm repeatedly toward head to indicate continued turning.

EMERGENCY STOP



Start with hands clasped over head. Extend downward repeatedly until vehicles stops.

PROCEED SLOWLY



Face palms in direction of desired travel. Bend both arms repeatedly toward head and chest, and then extend.

STOP



Cross both arms above head.

DISTANCE TO STOPPING POINT



Face palms forward, with hands above head. Bring elbow forward and hands together.

64. CODE OF BUSINESS CONDUCT, ETHICS AND ANTI- BRIBERY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC
CODE OF BUSINESS CONDUCT, ETHICS AND ANTI-BRIBERY POLICY

1. Preface

1. 1.1 Basics regarding the Business Code of Conduct, Ethics and Anti-Bribery Policy.

The Code of Business Conduct, Ethics and Anti-Bribery Policy (the “Code”) of Cox Energy, Industrial Coatings & Cleaning, LLC (“Cox Energy” or the “Corporation”) is to commit the Corporation, its boards of directors, principal officers, employees and all the workforce to the highest standards of business and ethical conduct. All employees, officers, directors, and subcontractors (collectively referred to as “Employees” in this code) must follow and abide by this code.

2.

2.1. Code Fundamentals

The fundamentals represent the basic beliefs that the Corporation aspires to, and they should be reflected in actions of all Employees at all times. The Corporation’s fundamentals are:

1. Complying with Laws

All Employees should respect and comply with all of the laws, rules and regulations of the State of West Virginia and the United States and all jurisdictions in which the Corporation conducts its business.

2. Conflicts of Interest

All Employees should be scrupulous in avoiding conflicts of interest with regard to the Corporation's interests. A "conflict of interest" exists whenever an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of the Corporation.

A conflict situation can arise when an Employee takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest may also arise when an Employee, or members of his or her family, receives improper personal benefits as a result of his or her position in the Corporation, whether received from the Corporation or a third party. Loans to Employees and their respective family members are prohibited. Any Employee who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate person or officer.

3. Hospitality/Gifts

No gift or entertainment should be offered, given, provided, or accepted by any Employee, family member of an Employee or agent. Gifts above \$50.00 outside the Corporation's regular practices should be reported to the Corporations HR manager.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers or others. No gift or entertainment should be offered, given, provided, or accepted by any Employee, family member of an Employee or agent unless it:

- is not a cash gift;
- is consistent with customary business practices;
- is not excessive in value;
- cannot be construed as a bribe or payoff; and
- does not violate any laws or regulations.

Hospitality (also referred to as entertainment) covers (but is not limited to) invitations to lunch, dinner, sporting events, trips abroad, payment for hotel accommodation, flights, and similar activities.

A gift is something given for which no payment is made - e.g., tickets to a football game, food, a branded item, wine, plane tickets and similar.

The Corporation prohibits any hospitality given with the intention of improperly influencing a third party to give the Corporation business or to do the Corporation a favor. Likewise, hospitality given after the event, as a reward for business or a favor, is prohibited.

Giving or receiving gifts is discouraged by the Corporation. However, if you do receive or give a gift, the same rules apply as for hospitality. Employees should never offer hospitality to a public official or accept the same from a public official without prior authorization from the HR Manager.

Any hospitality (or gifts) given or received must be:

- given to establish or improve good business relations, promote the Corporation's business or image, or for some other bona fide reason;
- reasonable and proportionate in value to the status and seniority of both the persons giving and receiving them;
- not to a public official, in which case the prior consent of the Anti-Bribery Officer is required; and within the financial limits set out below;
- in compliance with the local laws of the country in question; and
- not involving insalubrious premises or illegal substances or excessive consumption of alcohol.

Employees should report by email all hospitality or gifts given or received to the HR Manager.

4. Bribery

A bribe is where money or anything of value (even token value) is offered or given to influence the making of a decision by a third party/persuade them to perform their job improperly, or as a reward for having done so. It is also bribery to receive or ask for a bribe, not just to offer or give one. It also includes offering bribes and asking for bribes, regardless of whether the bribe is actually paid, and paying bribes via third parties. It is also bribery to directly or indirectly give, offer, agree to give or agree to offer, a loan, reward, advantage or benefit of any kind to a foreign public official (or any person for the benefit of a foreign public official) to induce the official to do/ not to do something in order to help the Corporation obtain/retain business or a business advantage.

In addition, doing any of the above so that the official uses his/her position to influence any acts or decisions of the government/body they work for is a bribe.

It should be understood that the Corporation's anti-bribery policy is not just limited to bribes paid to government officials and includes bribes paid to or from any third parties, including employees of private companies.

"Facilitation payments" are non-official payments made to government officials anywhere in the world which the official (typically low level) may ask for to speed up/perform routine governmental action (such as processing visas, granting licenses, providing mail delivery, unloading cargo, providing police protection, provision of telephone services or utilities etc.).

Bribery is a criminal offence. Never offer, give, request, or accept a bribe.

Never authorize nor allow any third party working with or for the Corporation, such as a subcontractor or joint venture partner, to pay bribes on the Corporation's behalf.

Never pay a local government official a facilitation payment. The only exception is if you have a genuine and immediate concern for your own

safety. Employees must report any facilitation payment that they are requested to make or that they have made to the Corporation's HR manager as soon as possible.

5. Contracts

Only persons at management level (management being, for these purposes and throughout this Code, only the chief executive officer) may enter into contracts with third parties on the Corporation's behalf. Never make an agreement on behalf of the Corporation with a third party verbally, or otherwise without consent from the CEO.

This includes but is not limited to:

- consultants, agents, and intermediaries - e.g., local in country agents retained to represent the Corporation or to fulfil certain tasks;
- contractors - e.g., logistics/transport companies, catering contractors and all other types of contractors;
- suppliers who provide services on behalf of the Corporation.

All contracts must be referred to the HR Manager for approval prior to signature.

6. Corporate Opportunity

Employees are prohibited from taking for themselves personally opportunities that properly belong to the Corporation.

Employees are prohibited from engaging in the following:

- taking for themselves personal opportunities that properly belong to the Corporation or are discovered through the use of the Corporation's property, information or position;
- using the Corporation's property, information, or position for personal gain, and competing with the Corporation. Employees owe a duty to the Corporation to advance its legitimate interests

when the opportunity to do so arises in preference to their own personal interests.

7. Confidentiality

Employees must maintain the confidentiality of confidential information entrusted to them by the Corporation or its suppliers or customers, except when disclosure is authorized by or required by applicable laws, regulations, or legal proceedings.

Confidential information includes all non-public information that might be of use to competitors of the Corporation, or harmful to the Corporation or its customers if disclosed. The interests of the Corporation must not be advanced through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present employees of other companies is prohibited.

8. Fair Dealing

Each Employee should endeavor to deal fairly with the Corporation's customers, suppliers, competitors, officers, and employees and with all the various regulatory authorities with which the Corporation deals. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

Furthermore, the Corporation prohibits all payments to political parties whether directly or indirectly unless the CEO has given prior approval. This includes:

- donations, loans, pledges (conditional or otherwise), gifts and subscriptions;
- payment for dinners, conferences, purchase of publications and similar where a significant fundraising element for a political party is involved; and

- any payments to lobbying firms, other organizations or charities which are fronts for or which channel funds to political parties or individual politicians.

No charitable donations should be made on behalf of the Corporation without the prior approval of the CEO.

No individual or firm shall be engaged to carry out lobbying activities on behalf of the Corporation without the prior approval of the CEO.

9. Protection and Proper Use of the Corporation Assets.

All Employees should protect the Corporation's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Corporation's profitability. All Corporation assets should be used only for legitimate business purposes. All Employees should protect the Corporation's assets and ensure their efficient use.

10. Financial Reporting/Records

The Corporation's policy is to comply with all applicable financial reporting and accounting regulations applicable to the Corporation. If any Employee has concerns or complaints regarding questionable accounting or auditing matters of the Corporation, then he or she is encouraged to submit those concerns or complaints (anonymously, confidentially, or otherwise) to HR Manager, which will, subject to its duties arising under applicable law, regulations, and legal proceedings, treat such submissions confidentially.

For financial recording purposes the following must be observed:

- never allow documents to be issued i.e., invoices or receipts which do not accurately record the transaction to which they relate. This includes: a) the value; b) the parties and c) the goods or services supplied.
- always ensure all receipts and expenditures are fully recorded in the books and records of the Corporation.

11. Tax Evasion

The Corporation pays all relevant taxes in the jurisdictions in which it operates. All Employees should ensure that the Corporation complies with its taxation obligations.

In addition, it is strictly prohibited for any Employee to assist or facilitate a third party to commit tax evasion. Assisting others to evade taxes is a criminal offence in many jurisdictions and could give rise to criminal liability for both the Employee and the Corporation.

Tax evasion is a criminal offence in many jurisdictions which could lead to prosecution of the Corporation and those involved in it as well as substantial damage to the Corporation's reputation. If Employees have a concern that any person is seeking to evade taxes (whether on behalf of the Corporation itself) or a third party, they should speak to their manager or HR Manager.

12. Reporting Any Illegal or Unethical Behavior

Employees are encouraged to talk to supervisors, managers, or other appropriate personnel about observed illegal or unethical behavior and, when in doubt, about the best course of action in a particular situation.

Employees aware of illegal or unethical behavior should report this behavior to superiors. Furthermore, it is the responsibility of all Employees to report any actual or presumed misconduct or violations of the ethics standards.

13. No Retaliation

The Corporation will not permit retaliation of any kind by or on behalf of the Corporation and its Employees against good faith reports or complaints of apparent violations of this Code or other illegal or unethical conduct.

14. Harassment

The Corporation does not tolerate any form of harassment or bullying in the workplace. All people should be treated fairly with respect, equality, and dignity. Harassment is an unwelcome action, conduct or

behavior that a reasonable person would find unwelcome, humiliating, intimidating or offensive. A few key principles to follow:

- do not physically or verbally intimidate or humiliate others;
- do not make inappropriate jokes or comments;
- do not distribute or display offensive or derogatory material; and
- do not be afraid to challenge someone if you find their behavior hostile, intimidating or humiliating.

15. Health, Safety, Environment and Social Performance

The Corporation's commitment to sustainable development requires us to balance our short and long-term interests and to integrate economic, health, safety, security, environmental and social considerations into business decisions. The Corporation is committed to taking every reasonable precaution to ensure a safe and healthy work environment for all Employees. Proper use and management of the world's limited resources and the environment is the responsibility of the industry and the Corporation itself.

16. Misconduct and Violations of Ethics Standards

It is the responsibility of all Employees to report to the CEO any actual or presumed misconduct or violations of ethics standards.

17. Policy Enforcement

Any Employee found to have violated this Code may be subject to disciplinary action which may include termination of employment or engagement.

3.

3.1 Conclusion

This Code will be reviewed on a yearly basis or earlier if any significant changes occur, and notification of revisions on this document will be communicated to users.

A copy of this document will be available at the corporate office, and in the Corporation's HSE Manual

65. CYBER POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

CYBER POLICY

POLICY BRIEF & PURPOSE

Cox Energy's cyber security policy outlines our guidelines and provisions for preserving the security of our data and technology infrastructure. The more we rely on technology to collect, store and manage information, the more vulnerable we become to severe security breaches. Human errors, hacker attacks and system malfunctions could cause great financial damage and may jeopardize our company's reputation. For this reason, we implemented a number of security measures. We have also prepared instructions that may help mitigate security risks. We have outlined both provisions in this policy.

SCOPE

This policy applies to all our employees, contractors, and anyone who has permanent or temporary access to our systems and hardware.

POLICY ELEMENTS

- Confidential data

Confidential data is secret and valuable. Common examples are:

- Unpublished financial information
- Data of customers/partners/vendors
- Patents, formulas or new technologies
- Customer lists (existing and prospective)

All employees are obliged to protect this data. In this policy, we will give our employees instructions on how to avoid security breaches.

PROTECT PERSONAL AND COMPANY DEVICES

When employees use their digital devices to access company emails or accounts, they introduce security risk to our data. We advise our employees to keep both their personal and company-issued computer, tablet and cell phone secure.

They can do this if they:

- Keep all devices password protected.
- Choose and upgrade a complete antivirus software.
- Ensure they do not leave their devices exposed or unattended.
- Install security updates of browsers and systems monthly or as soon as updates are available.
- Log into company accounts and systems through secure and private networks only.

Employees may not access internal systems and accounts from other people's devices or lending their own devices to others.

When new hires receive company-issued equipment they will receive instructions for:

- Disk encryption setup
- Password management tool setup
- Installation of antivirus/anti-malware software

They should follow instructions to protect their devices and refer to our human resources if they have any questions.

KEEP EMAILS SAFE

Emails often host scams and malicious software (e.g., worms.) To avoid virus infection or data theft, we instruct employees to:

- Avoid opening attachments and clicking on links when the content is not adequately explained (e.g. "watch this video, it's amazing.")
- Be suspicious of clickbait titles (e.g. offering prizes, advice.)
- Check email and names of people they received a message from to ensure they are legitimate.
- Look for inconsistencies or giveaways (e.g. grammar mistakes, capital letters, excessive number of exclamation marks.)

If an employee isn't sure that an email they received is safe, they can refer to human resources with questions.

MANAGE PASSWORDS PROPERLY

Password leaks are dangerous since they can compromise our entire infrastructure. Not only should passwords be secure so they won't be easily hacked, but they should also remain secret. For this reason, we advise our employees to:

- Choose passwords with at least eight characters (including capital and lower-case letters, numbers and symbols) and avoid information that can be easily guessed (e.g. birthdays.)
- Remember passwords instead of writing them down. If employees need to write their passwords, they are obliged to keep the paper or digital document confidential and destroy it when their work is done.
- Exchange credentials only when absolutely necessary. When exchanging them in-person isn't possible, employees should prefer the phone instead of email, and only if they personally recognize the person they are talking to.
- Change their passwords every two months.

TRANSFER DATA SECURELY

Transferring data introduces security risk. Employees must:

- Avoid transferring sensitive data (e.g. customer information, employee records) to other devices or accounts unless absolutely necessary. When mass transfer of such data is needed, we request employees to ask our [Security Specialists] for help.
- Share confidential data over the company network/ system and not over public Wi-Fi or private connection.
- Ensure that the recipients of the data are properly authorized people or organizations and have adequate security policies.
- Report scams, privacy breaches and hacking attempts

Our human resources needs to know about scams, breaches and malware so they can better protect our infrastructure. For this reason, we advise our employees to report perceived attacks, suspicious emails or phishing attempts as soon as possible to human resources.

ADDITIONAL MEASURES

To reduce the likelihood of security breaches, we also instruct our employees to:

- Turn off their screens and lock their devices when leaving their desks.
- Report stolen or damaged equipment as soon as possible to human resources.
- Change all account passwords at once when a device is stolen.
- Report a perceived threat or possible security weakness in company systems.
- Refrain from downloading suspicious, unauthorized or illegal software on their company equipment.
- Avoid accessing suspicious websites.

NETWORK ADMINISTRATORS

Our Network Administrator should:

- Install firewalls, anti malware software and access authentication systems.
- Arrange for security training to all employees.
- Inform employees regularly about new scam emails or viruses and ways to combat them.
- Investigate security breaches thoroughly.
- Follow this policies provisions as other employees do.

REMOTE EMPLOYEES

Remote employees must follow this policy's instructions too. Since they will be accessing our company's accounts and systems from a distance, they are obliged to follow all data encryption, protection standards and settings, and ensure their private network is secure. We encourage them to seek advice from our human resources department.

DISCIPLINARY ACTION

We expect all our employees to always follow this policy and those who cause security breaches may face disciplinary action:

- First-time, unintentional, small-scale security breach: We may issue a verbal warning and train the employee on security.
- Intentional, repeated or large-scale breaches (which cause severe financial or other damage): We will invoke more severe disciplinary action up to and including termination.
- We will examine each incident on a case-by-case basis.
- Additionally, employees who are observed to disregard our security instructions will face progressive discipline, even if their behavior hasn't resulted in a security breach.

TAKE SECURITY SERIOUSLY

Everyone, from our customers and partners to our employees and contractors, should feel that their data is safe. The only way to gain their trust is to proactively protect our systems and databases. We can all contribute to this by being vigilant and keeping cyber security top of mind.

66.

INFORMATION
SECURITY
MANAGEMENT
(ISM) AND
CONTROL OF
DOCUMENTED
INFORMATION
POLICY

COX ENERGY, INDUSTRIAL COATING AND CLEANING, LLC'S
INFORMATION SECURITY MANAGEMENT (ISM) AND DOCUMENTED
INFORMATION POLICY

Policy: Documents used within the Company for construction projects, such as drawings/data and/or procedures, blueprints, permits, contracts, specs, and any other documentation related to construction projects are controlled in accordance with this Policy. Controlled documents are maintained at the Company's business office, or at construction project sites when appropriate.

Purpose:

Provide guidance on, among other things, how to determine the adequacy, proper approval, up-to-date information, legibility, and proper identification of documents.

Provide a standardized approach to identifying controlled documents.

Provide process for the removal of obsolete and out-of-date documents from circulation.

Provide guidance on the availability of documents to Company personnel, ensuring that the most up to date version is the only version immediately accessible.

Control documents to ensure distribution, access, storage, retention, review, and disposition as needed to maintain accessibility to the most up to date version of a document.

Definitions:

Controlled Documents - documents that are used for construction projects, such as, drawings/data and/or procedures, blueprints, permits, contracts, specs, and any other documentation related to construction projects.

External Documents - documents of external origin that are necessary to for construction projects.

Quality Management System (QMS) - comprises of activities by which the Company identifies its objectives and determines the processes and resources required to achieve desired results. The QMS provides the following: 1) manages the Interacting processes and resources required to provide value and realize results for relevant interested parties; 2) enables leadership to optimize the use of resources considering the long- and short-term

consequences of their decisions; and 3) provides the means to identify actions to address intended and unintended consequences in providing patient care and services.

Uncontrolled Documents - Printed documents that are missing required information.

Reference Documents - Documents that are not meant to be posted or printed but to be accessed as needed to provide direction on a process, practice, or procedure.

Proprietary Documents - Documents that have a copyright or legal right that limits the printing, distribution, posting, or revision of the documents.

Procedure/ Process:

Personnel shall:

Identify documents used/needed within the Company to support operations/QMS.
Properly file or dispose of printed documents or after use.

Management shall:

Create or revise documents in accordance with the approval process.
Consider system standardization of document prior to use.
Review needs of documents and element presence prior to providing documents to the project personnel.
Ensure documents are reviewed and updated as needed.
Educate personnel to any document changes as appropriate.
Ensure the responsible disposal of out-of-date documents.
Ensure elements are present on printed documents to identify version and need for replacement.
Ensure external documents are included the required elements.

Document Quick Guide

Document Type	Required Elements
Drawings/blueprint	1. Properly stamped by professional. 2. Legible. 3. Revisions properly noted.
Policies/Procedure	1. Most up-to-date version. 2. Legible.
Permits	1. Properly stamped by issuing agency. 2. Legible. 3. Revisions properly noted.

Contracts	1. Properly executed. 2. Contain any addendum and Change Orders. 3. Legible.
Specification	1. Properly issued by owner. 2. Legible. 3. Revision properly noted.
Miscellaneous	As applicable – 1. Properly executed/issued. 2. Revisions properly noted.

67. DATA PROTECTION AND PRIVACY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

DATA PROTECTION AND PRIVACY POLICY

PURPOSE

Cox Energy is committed to protecting the privacy and confidentiality of data collected or processed during its business operations. This Data Protection and Privacy Policy outlines the principles and practices that govern the collection, use, disclosure, and protection of data by the Company.

SCOPE

This Policy applies to all employees, contractors, vendors, and third parties who collect, use, or process personal data on behalf of the Company. It also applies to all personal data collected from customers, clients, partners, and other individuals.

DATA COLLECTION

We may collect data such as name, address, email, phone number, job title, and other information, from customers, employees, and clients. We collect data through various channels, such as our website, email, phone, and in-person interactions. We may also collect personal information from third-party sources, such as service providers and business partners.

DATA USE

The Company will only use data for the purposes for which it was collected or as otherwise permitted by applicable laws and regulations. Data may be used for, but not limited to, the following purposes: Providing products or services requested by individuals; Communicating with individuals about products, services, or other business-related matters; Conducting market research, analytics, and improving business operations; Managing and administering employee or contractor relationships; Complying with legal or regulatory requirements; Protecting the rights and interests of the Company or its customers.

DISCLOSURE

The Company may share data with third parties for legitimate business purposes, including but not limited to, service providers, vendors, contractors, and business partners. Data may also be disclosed to comply with legal or regulatory requirements, or in response to lawful requests from public authorities. The Company will take appropriate measures to ensure that third parties receiving personal data are bound by confidentiality obligations and provide adequate protection to the data.

DATA PROTECTION

The Company will protect data by implementing technical and administrative safeguards to protect data. We use encryption, access controls, and internal security audits. In addition we use off-site system backups.

DATA RETENTION

The Company will only retain data for as long as it is required.

68. WORK ZONE TRAFFIC CONTROL SAFETY POLICY

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC
Work Zone Traffic Control Safety Policy

This Work Zone Traffic Control Safety Policy has been established to communicate the basic principles and standards to be observed by all employees who perform work in the public right-of-way, to provide a safe and effective work area and to warn, control, protect and expedite vehicular, bicycle, and pedestrian and traffic.

Training Topics

- Understand that flagging is an essential component of worksite safety, and improper flagging can result in serious injuries to workers, motorists and pedestrians.
- To reinforce flagging safety rules.
- To consider ways to protect yourself from the hazards of flagging.

Planning for traffic safety:

- Road user and worker safety are a high priority element from planning through design and construction.
- The needs of all road users including persons with disabilities should be addressed.
- Always plan to minimize traffic delays.
- Minimize interference with traffic flow, including vehicular, bicycle, and pedestrian traffic.
- Do not make abrupt changes to traffic patterns that would require rapid vehicle maneuvers.
- Road user movement should be inhibited as little as practical.

Providing clear and positive guidance on how to get through the work zone:

- Give adequate advance warning to drivers, bicyclists, and pedestrians of the upcoming work zone.
- Use appropriate traffic control devices such as cones or portable sign supports.
- Remove/cover any conflicting signing.
- Use flaggers when necessary.

Performing continuous inspection and maintenance of traffic control devices:

- Inspections should be performed by someone who is appropriately trained.
- Repair or replace devices as necessary.
- Monitor and modify work zone as project progresses.

Maintaining roadside safety throughout the project:

- Provide a recovery area for errant vehicles.
- Store equipment and materials where they won't get hit.

Making sure workers receive the training that is required:

- All those who are involved with planning, design, construction, and maintenance of a work zone should have the appropriate safety training.

Maintaining good public relations:

- Provide appropriate advance notice and cooperate with various news media in publicizing work zone.
- Address the needs of abutting property and business owners.
- Address the needs of all emergency service providers.

General

There must be a traffic control plan for the movement of vehicles in areas where there are also workers conducting other tasks. Drivers, workers on foot, and pedestrians must be able to see and understand the routes they are to follow. The authority in charge, Federal, state, or local, will determine the configuration of the temporary traffic control zone for motorists and pedestrians. The construction project manager will determine the internal traffic control plan within the construction/demolition worksite. When there are several projects, coordinated vehicle routes and communication between contractors will reduce vehicle struck-by incidents.

Signs

Standard highway signs for information, speed limits, and work zones will assist drivers in identifying designated traffic paths, such directives as: EVACUATION ROUTE; DO NOT ENTER; REDUCED SPEED AHEAD; ROAD CLOSED; and NO OUTLET. Using standard

highway signs for internal construction worksite traffic control will assist workers in recognizing the route they are to use at the construction site.

Traffic Control Devices

Standard traffic control devices, signals, and message boards will instruct drivers to follow a path away from where work is being done. The authority in charge will determine the approved traffic control devices such as cones, barrels, barricades, and delineator posts that will be used as part of the traffic control plan. These standard devices should also be used inside the work zone.

Work Zone Protections

Various styles of concrete, water, sand, collapsible barriers, crash cushions, and truck-mounted attenuators are available to limit motorist intrusions into the construction work zone.

Flagging

Flaggers and others providing temporary traffic control should wear high visibility clothing with a background of fluorescent orange-red or yellow-green and retroreflective material of orange, yellow, white, silver, or yellow-green. In areas of traffic movement, this personal protective equipment will make the worker visible for at least 1,000 feet, so that the worker can be seen from any direction, and make the worker stand out from the background. Check the label or packaging to ensure that the garments are performance class 2 or 3.

Drivers should be warned in advance with signs that there will be a flagger ahead. Flaggers should use STOP/SLOW paddles, paddles with lights, or flags (flags should be used only in emergencies.) The STOP sign should be octagonal with a red background and white letters and border. The SLOW sign is the same shape, with an orange background and black letters and a border.

Lighting

Flagger stations should be illuminated. Lighting for workers on foot and equipment operators is to be at least 5 foot-candles or greater. Where available lighting is not sufficient, flares or chemical lighting should be used. Glare affecting workers and motorists should be controlled or eliminated.

Training

Flaggers should be trained/certified and use the signaling methods required by the authority in charge. Workers on foot, equipment operators, and drivers in internal work zones need to know the routes that construction vehicles will use. Equipment operators and signal persons need to know the hand signals used on the worksite. Operators and workers on foot need to know the visibility limits and the “blind spots” for each vehicle on site. Workers on foot should wear high visibility safety garments designated as class 1, 2, or 3. Workers should be made aware of the ways in which shiftwork and nightwork may affect their performance.

Goals

Proper traffic control techniques shall be effectively utilized to:

- Ensure Safety for the public, work crews, motorists, cyclists, and pedestrians
- Provide guidance for safe effective work areas, to warn, control, protect, and expedite vehicular and pedestrian traffic
- Provide safe access for police, fire, and rescue vehicles
- Prevent damage to private and public property, including damage to construction projects and construction equipment
- Minimize the possibility of claims and litigation from construction area accidents
- Reduce confusion to motorists, bicycles, and pedestrians
- Improve public communications
- Ensure conformity with national, state and city regulations for traffic control

The responsibility for the installation and maintenance of work area traffic control shall rest with the contractor doing the work. All work area traffic control setups and devices shall conform to the current edition of the Manual of Uniform Traffic Control Devices (MUTCD).

Planning

All persons responsible for supervising work sites shall plan in advance to keep traffic obstructions, public inconvenience and lost work time to a minimum.

The planning responsibility likely requires a visit to the work site to consider: special attention shall be given to individuals under the American Disability Act, traffic conditions, existing traffic control, “existing signage”, traffic lane requirements, physical features, activities, the type, number and location placement of signs, barricades, lights and bicyclists and pedestrians affected by the work sites. Where physical conditions such as hills, curves, buildings, vegetation etc. reduce or obscure the drivers view, additional precautions may become necessary.

In planning for the safety of all involved, consider the traveling public and remember:

- They must be warned sufficiently in advance to allow time to react
- They must have time to regulate their speed , to allow them to pass through the guidance pattern with safety and ensure an even flow of traffic
- The need for decision making must be reduced to a minimum

Supervisor Responsibilities

- Install and maintain required traffic control devices.
- Provide Certified Flaggers when required.
- All crew members, employees, and visitors of a work site, working in or near the public right-of-way must wear personal protective equipment, as required (American National Standards Institute (ANSI) ISEA 107-2004 - “High-Visibility Safety Apparel and Headwear”).
- Provide adequate safeguards for workers and the general public.

- Service check the construction sites as required and/or requested to ensure that all devices are in place and operating at all times.
- Remove all traffic control devices immediately when they are no longer needed.
- Work on arterial roadways is encouraged to occur at night and weekends.

Temporary Traffic Control Zone Devices

The most effective system of warning and guidance is provided through properly planned usage of traffic control devices, uniformly placed and well maintained. All traffic control, warning and guidance shall meet at least the minimum requirements of the latest Manual of Uniform Traffic Control Devices (MUTCD) for Streets and Highways.

Sign Placement

A work area traffic control zone is defined as the stretch or portion of roadway or highway in which all of the traffic control devices are used to warn, regulate or guide motorists, bicyclists and pedestrians past roadway construction or maintenance operations. It is often the portion of the roadway for construction and maintenance work that is performed on or near the public right-of-way. There are several ways to do this; each involves some form of closure; and every situation and location may be different.

Pre-warning signs should not be placed in any portion of the bike lane, sidewalk, or driveway. Certain conditions may warrant the use of a portion of the sidewalk. See the Traffic Operation Departments for specific instructions. The only sign that may be placed in the bike lane is the BIKE LANE ENDS MERGE WITH TRAFFIC sign, Black on Orange, 4" letters on a 30" x 24" inch sign black. This sign is to be placed at the point where the transition starts, when closing a drive lane. See Traffic Operations department for specifics on this sign.

- 1) Traffic lanes may be narrowed to NO LESS than 10' ft. in width.
- 2) Traffic may be moved over into part of the shoulder, providing that portion is safely drivable to motorists and bicyclists.
- 3) Traffic may be detoured over another route, providing the detour route does not interfere with another project within the area.
- 4) All open holes (sidewalk removal, utility trenches, tie-ins, bore pits, etc.) left overnight MUST be illuminated and surrounded with the proper safety devices.
- 5) Guidelines prefer to open only areas that contractors and permittees can backfill at the end of approved working hours.

All roadway traffic control zones shall have an advance warning area, a transition area, a buffer area, a work area and the termination area. The main devices used in these areas are cones, barrels, barricades and the diamond-shaped pre-warning signs in the black on orange series specified for construction and maintenance sites. Each apparatus may or may not require various

predetermined illumination but must have reflectorized material. All traffic control devices must meet the minimum or exceed the specifications set forth in the MUTCD manual.

The advance warning area starts the Work Area Traffic Control Zone and consideration must be taken in the placement of the traffic control devices, depending on varying situations.; these could be driveways, side streets, site obstruction, parked vehicles, etc.

Signs that have distance footage, such as ROAD WORK AHEAD 1000 FEET, should not be used within the city limits, they should only read as ROAD WORK AHEAD. When used, the END ROAD WORK sign should be placed near the end of the termination area.

Signs shall face and be visible to oncoming traffic and should be a minimum of (2') two feet from the bottom of the sign to the pavement of the roadway. If a location proves a sign is not visible enough at two feet from the bottom of the sign to the pavement, then it may be required to be placed at a higher height.

Only on raised center medians islands can double posted signs be used, never on just a painted center median island, unless prior approval is obtained from the Traffic Operations Department. All signs placed on State Highways (2 signs required, on either side of the roadway, when a divided center median is present) 48" x 48" must be used on the right-hand shoulder and 36" x 36" in the center median and meet all highway specifications.

Signs shall be installed immediately before work is to commence and be removed immediately when they are no longer needed. Pre-project specialty signs may be placed prior to work for additional pre-warning of projects

All signs, which are to convey their message during darkness, shall be reflectorized and/or illuminated. Signs not used for overnight projects should not be left in any portion of the roadway (including bike lanes or sidewalks). Signs may not be left in place and turned backward. Examples of acceptable overnight signage would include total road closures, partial road closures, drive lanes, or a closure due to emergency.

Specialty Signs

Specialty signs may be required for long duration projects (for informational purposes) or where construction will impact traffic on major streets, roadways, intersections, bike lanes, sidewalks, etc. They may be also used in some cases where full road closure is allowed to pre-worn motorist in advance of the start of a project.

Delineation Devices Barricades

Barricades serve the following purposes:

- 1) To alert the public of the fact that a particular area is closed to traffic
- 2) To prevent drivers, bicyclists and pedestrians from entering the work area.

- 3) To protect the workers, equipment and other people or items inside the work area.
- 4) To support warning lights and specific signs that are required on certain projects.

Barricades should not be placed in a driving lane or bike lane without the proper advance warning signs. When barricades are used to close the roadway, they should be placed so there is no gap large enough for a vehicle or bicyclist to pass through, usually between 2 -3 feet, except when it is necessary to provide access for local traffic or emergency vehicles.

Markings for barricade rails shall be alternate orange and white stripes sloping downward at an angle of 45 degrees in the direction traffic is to pass. The entire area of white and orange shall be reflectorized.

Delineators

Delineators are markers which aid the driver and bicyclist in determining the location and alignment of the traffic lane or the edge line. By day, the effectiveness of the delineators is determined by the position, spacing, form, texture, size and color. By night, the effectiveness is determined by position and visibility. All delineators used at night **MUST** be reflectorized and adequately maintained.

Delineators are used:

- 1) To channel and divert traffic in advance of the work zones.
- 2) To define the travel way through the work zone.
- 3) To define curves and the edge of the roadway or detours.

Delineators shall be of a material that withstands impact without appreciable damage to the device, the striking vehicle or passing traffic.

Due consideration also must be given to the necessity against knockdown from the wind or turbulence due to passing traffic.

Devices which could roll into adjacent traffic lanes when hit shall not be used. Metal or wooden posts mounted in concrete filled buckets or on automobile wheels or rounded metal bases are examples of the types that are prohibited.

All vertical panels shall be a minimum of 36" inches in height.

Cones

Traffic cones and tubular markers of various configurations are available. All cones must have a reflective collar to help highlight the taper or transition and work area. The collar must be a 6" inch band and should be placed 3" to 4" inches from the top of the cone and supplemented with a 4" inch collar spaced a minimum of 2" inches below the 6" inch collar.

Cones should not be used for nighttime operations unless an emergency should arise and must be replaced with the proper nighttime equipment.

Illumination

Barricade warning lights are used to indicate hazards and to delineate the safe path of travel. A single flashing light is to be mounted on barricades to indicate a hazard in or adjacent to the roadway. Flashers are also effectively used to draw attention to warning signs in the Traffic Control Zone. Flashing lights are also used to highlight the beginning of tapers or lane shifting.

- 1) When reflectorize panels may be covered with dust or snow.
- 2) In times of decreased visibility due to rain, snow, or fog.
- 3) On barricades and vertical panels for curves in the roadway.
- 4) To alert pedestrians and bicyclists.
- 5) At hazardous locations and for channelizing slow speed areas.

Flashing yellow lights used for advance warning must be clearly distinguishable from primary delineation and shall be seen above normal reflectorized units. Warning lights are portable, lens-directed, enclosed and mounted at a minimum of 3 feet from the bottom to the pavement of the roadway. The color of the light emitted shall be yellow. Barricade warning lights shall be in accordance with the requirements of the MUTCD Manual.

Flagger Requirements

Flaggers are required:

- Where workers or equipment intermittently block traffic lanes or a two-lane roadway, or any other operation where equipment will obstruct the free flow of traffic.
- Where the safety of the public and/or workers are at risk.
- Flaggers have significant responsibility. They should be alert, intelligent, and neat in appearance, have good hearing, eyesight, and be capable of commanding the traveling public. They should be stationed far enough from the work area to slow down or stop traffic before it enters the work area. All pre-warning signs should be placed well in advance of the flagger station as much as is practical. Cell phone use and the use of earbuds or headphones is not acceptable while flagging in the public right-of-way.
- All flaggers shall have and wear the proper safety equipment:
- Class 3 Safety vests (in good repair).
- Stop/slow sign paddle (18" x 18" minimum) in good repair. A six foot (6') minimum staff - *bottom of sign to ground is required.
- Proper attire for all weather conditions.
- Shall have in their possession a current flagger certificate card (copies will not be accepted) at all times while working in the public right-of-way.

Traffic Control Supervisor

The “Qualified Person” who developed and will implement a written Work Zone Protection Plan” that includes a named on-site “Competent Person” who will carry-out the plan, for each American Water project. This “Competent Person” has the authority to apply the above referenced standards in accordance with all applicable provisions of named standards organizations.

Pedestrians

When work areas encroach upon sidewalks, walkways, or crosswalks adequate protection for the safety of pedestrians must be provided. There are three primary considerations in planning for pedestrians in the work area traffic control zone:

- Pedestrians shall not be led into conflicts with work site vehicles, equipment or operations.
- Pedestrians should be provided with a reasonable, convenient and accessible path that replicates as nearly as possible the most desirable characteristics of the exiting sidewalks or foot paths.
- Access to recommended school crossings must be maintained at all times, or a detour with appropriate signage must be provided.

69. JOURNEY MANAGEMENT PLAN

COX ENERGY, INDUSTRIAL COATING AND CLEANING, LLC'S
JOURNEY MANAGEMENT PLAN

Purpose:

The purpose of this Journey Management Plan (hereinafter referred to as the "Plan") is to provide a plan to manage the company's road travel and other journeys.

Section 1. Review of Journey Management Plan

This Plan shall be reviewed with the company's road travelers before they perform any driving on the company's business. A copy of this Plan is readily available at the company's workplace for employee review. Employees who travel for the company shall carry a copy of this Plan with them when they are traveling on company business.

Section 2. Road travel is to be limited whenever practical

Road journeys should only be taken when necessary. Company road travelers shall complete multiple tasks in single trips to reduce the amount of driving for improved safety and efficiency. If the trip is being taken to meet with someone, employees shall determine if the meeting can be done over the phone instead. Whenever practicable, Employees shall take a safer method of travel (air, train, etc.).

Section 3. Road travel is to be limited to daylight hours whenever practical

Driving should be done during daylight hours rather than after dark whenever possible. The company's road travelers are to reduce speed when driving at night and to be aware of the potential for wildlife to be on the road especially when driving at dusk or dawn.

Section 4. Driving during adverse weather conditions shall be avoided whenever practicable.

Before leaving on a trip, company road travelers shall ensure that weather conditions are safe for driving and ensure the vehicle being used is adequate for the weather conditions. Furthermore, the company's road travelers shall make sure emergency supplies are in the vehicle, and the driver has a cell phone in case of emergency. In particularly harsh conditions, company road travelers shall consider canceling or rescheduling the trip.

Section 5. Prior to taking a trip, company road travelers shall secure driving directions before traveling to an unfamiliar destination.

Before taking a trip to an unfamiliar location, company road travelers shall ensure that they

have printed driving directions available. Company road travelers shall not plan to read directions from a smartphone while driving. A GPS device may be used, but printed directions should be kept as a back-up.

Section 6. Prior to taking a trip, company road travelers shall notify the company of their travel plans.

Company road travelers shall notify their supervisor or another individual who is not traveling with them of their travel plans. This notification includes where they are going, when they should be getting there, and when they plan to return.

Section 7. Company road traveler drivers shall carry a reliable method of communication when traveling on company business in case of emergency and otherwise.

Company road traveler drivers shall always carry a cell phone, especially when traveling in rural areas. Company vehicles are monitored by a company in-vehicle Azuga device that is used to communicate and have remote diagnostic services with the vehicle. Should the company discontinue the use of this system, it shall subscribe to an in-vehicle communication/remote diagnostic service (e.g. cell phones, CB radio, On-Star, etc.) if your vehicle is equipped with one.

Section 8. Company road travelers shall take rest breaks to reduce fatigue.

When driving long distances, company road travelers shall take sufficient breaks to prevent fatigue. When driving alone and having trouble staying awake, pull off the road and get out of the vehicle for fresh air, or take a power nap. If driving late at night, consider getting a hotel room and starting fresh the next day. If two licensed drivers are in the vehicle, take turns driving. Get plenty of rest before beginning your journey.

Section 9. Company vehicles shall be equipped with roadside emergency kits.

Roadside emergency kits shall be kept in all company vehicles used for highway travel. These kits shall include equipment to assist in a roadside emergency such as water, booster cables, first aid supplies, warning triangles, flashlights, etc. If there is a potential for snow and ice, company road travelers shall carry sandbags and a shovel in the vehicle.

70. PERMIT TO WORK PROGRAM- SAFE WORK PERMIT

COX ENERGY, INDUSTRIAL COATING AND CLEANING, LLC'S
PERMIT TO WORK PROGRAM - SAFE WORK PERMIT

Purpose

The purpose of this Permit to Work Program – Safe Work Permit (hereinafter referred to as the “Program”) is to provide a safe working environment for all company employees, subcontractors, owners and any other entity working on the company’s behalf.

Section 1. A Safe Work Permit shall be issued for all high-risk and non-routine tasks

A Safe Work Permit is to be issued for all high-risk and non-routine tasks. Company employees shall contact the authorized permit issuer to request a safe work permit prior to beginning work and shall not proceed with work until the permit is issued. When performing low-risk/routine tasks, company employees shall consult the authorized permit issuer to determine if a safe work permit is needed. Deviations from a work permit may apply in the event of an emergency.

Section 2. Safe Work Permit to be issued and executed before starting work

A Safe Work Permit shall be issued and executed before work on a task begins. In certain situations, it may not be reasonably practical to issue the permit prior to work beginning. Any such exceptions should be authorized by site supervisor.

Section 3. Roles, responsibilities and signatures of the personnel working under the permit

Permit Requestor: The individual requesting the Safe Work Permit. The Permit Requestor identifies hazards and proposed controls. The Permit Requestor shall not issue Safe Work Permits to himself.

Permit Issuer: The individual approving the use of Safe Work Permit. The Permit Issuer ensures that site preparations are complete and informs individuals affected by the work.

Permit Holder: The individual responsible for obtaining the Safe Work Permit. The Permit Holder ensures that work is carried out in accordance with conditions of the Work Permit.

Section 4. Active Safe Work Permits to be reviewed at the beginning of each shift change

Before the beginning of each shift, a thorough review of any active Safe Work Permits shall be completed by all company employees working on the project.

Section 5. Safe Work Permit must be reassessed or revised once the work scope changes, or new hazards are identified.

If the work scope changes, then the current safe work permit must be closed and a new permit must be issued. In situations where new, previously unidentified hazards arise, the safe work permit will be suspended and reviewed.

Section 6. A risk assessment shall be conducted to identify and assess hazards and ensure proper controls are implemented to mitigate identified hazards

Company employees shall perform a risk assessment to identify and assess hazards. Proper controls shall be implemented to mitigate identified hazards.

71. APPENDICES

APPENDICES

1.CO-WORKER CORRECTIVE ACTION RECORD

CO-WORKER CORRECTIVE ACTION RECORD ("CAR") FORM

Employee Name: _____

Job Title: _____

Supervisor Name: _____

Level of Corrective Action

☐ Verbal Warning/Counseling ☐ Written Warning/Reprimand ☐ Suspension ☐ Termination

Facts, including date and time of incident, and type of incident: _____

Employees Expectations: _____

Corrective Action Plan: _____

Action Taken: _____

Next Action Step if Issue Continues: _____

I acknowledge receipt of this disciplinary action and that its contents have been discussed with me. I understand that my signature does not necessarily indicate agreement.

Employees Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

A copy of this corrective action will be placed in your personnel file.

CEICC - - COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC
30 CHASE DRIVE, SCOTT DEPOT, WV 25526; P: (304) 932-4333

2. REFUSAL OF MEDICAL TREATMENT

REFUSAL OF MEDICAL TREATMENT

CURRENT DATE: _____

EMPLOYEE NAME: _____

INCIDENT DATE: _____

INJURY: _____

I have been advised of the procedures for seeking medical treatment for my alleged work-related injury/illness. By signing below, I am choosing to refuse medical treatment for the above-referenced injury. I understand that my signature indicates my refusal of the medical treatment that has been offered to me and that I am completely responsible for seeking medical attention on my own and will pay for any subsequent bills associated with this medical treatment. I further understand that my signature on this refusal form may result in loss of benefits under Workers' Compensation laws.

Employee Signature: _____

Date: _____

Supervisor Signature: _____

Date: _____

CEICC -- COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC
30 CHASE DRIVE, SCOTT DEPOT, WV 25526; P: (304) 932-4333

3. NEAR MISS REPORT

NEAR MISS REPORT

A near miss is a potential hazard or incident that has not resulted in any personal injury. Unsafe working conditions, unsafe employee work habits, improper use of equipment or use of malfunctioning equipment have the potential to cause work related injuries. It is everyone's responsibility to report and /or correct these potential accidents/incidents immediately. Please complete this form as a means to report these near-miss situations.

LOCATION: _____

DATE: _____ TIME: _____ ☐ am ☐ pm

Please check all appropriate conditions:

☐ Unsafe Act

☐ Unsafe equipment

☐ Unsafe Condition

☐ Unsafe use of equipment

Description of incident or potential hazard: _____

Employee Signature (Optional): _____ Date: _____

NEAR MISS INVESTIGATION

Description of the near-miss condition: _____

Causes (primary & contributing): _____

Corrective Action taken (remove the hazard, replace, repair, or restrain in the proper procedure for the task): _____

Signed: _____ Date Completed: _____

No completed for the following reasons: _____

Management: _____ Date: _____

CEICC -- COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC
30 CHASE DRIVE, SCOTT DEPOT, WV 25526; P: (304) 932-4333

4. MOTOR VEHICLE ACCIDENT REPORT

MOTOR VEHICLE ACCIDENT REPORT FORM

Date of Accident: _____ Day of the Week: _____ Hour: _____ ☐ am ☐ pm

LOCATION OF ACCIDENT

Highway/Street/Road on which Accident Occurred: _____

County: _____ City or Town: _____ State: _____

☐ at intersection with: _____

☐ If not intersection: _____ Feet ☐ N ☐ S ☐ E ☐ W of _____

VEHICLE/DRIVER INFORMATION

Year: _____ Make: _____ Model: _____ License No.: _____

VIN: _____ Unit No: _____ Seat Belt: ☐ Y ☐ N

Driver name: _____

Description of damage: _____

Speed you were traveling: _____

OTHER VEHICLE/DRIVER INFORMATION

Year: _____ Make: _____ Model: _____ License No.: _____

VIN: _____ Unit No: _____ Seat Belt: ☐ Y ☐ N

Driver name: _____

Driver address & phone: _____

Insurance company: _____ Agent: _____

Insurance Policy No.: _____ Agent telephone No.: _____

Description of damage: _____

INJURED

Name, Address, & Phone: _____

Extent of Injury: _____ Age: _____

☐ Pedestrian ☐ ATP Vehicle ☐ Other Vehicle ☐ Other: _____

Name, Address, & Phone: _____

Extent of Injury: _____ Age: _____

☐ Pedestrian ☐ ATP Vehicle ☐ Other Vehicle ☐ Other: _____

You Must Complete reverse side of document.

CEICC -- COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC
30 CHASE DRIVE, SCOTT DEPOT, WV 25526; P: (304) 932-4333

WITNESSES OR PASSENGERS

Name, Address, & Phone: _____

☐ Pedestrian ☐ ATP Vehicle ☐ Other Vehicle ☐ Other: _____

Name, Address, & Phone: _____

☐ Pedestrian ☐ ATP Vehicle ☐ Other Vehicle ☐ Other: _____

POLICE REPORT

Police Report: ☐ Y ☐ N If yes, please state which agency: _____

Case No.: _____ Phone No.: _____

Officer Name: _____ Charges: _____

PURPOSE OF TRIP

Brief Explanation of Trip Purpose: _____

NARRATIVE OF ACCIDENT

Briefly describe how the accident occurred: _____

DIAGRAM (indicate North):

ACCIDENT TYPE (check all that apply):

☐ Head-on Collision	☐ Collision between two State Vehicles/Equipment
☐ Collision with Fixed Object	☐ Collision with Parked Vehicle
☐ Rear End Collision	☐ Object Thrown from/by State Vehicle
☐ Ran Red Light/Stop Sign	☐ Hit inside by Other Vehicle
☐ Hit & Run Collision	☐ Struck by Falling or Flying Objects
☐ Collision with a Pedestrian	☐ Collision with Animal (wild or domestic)
☐ Collision with Bicyclist or Motorcycle	☐ Fire
☐ Backed without Safety	☐ Theft
☐ Vehicle Roll Over/Jackknife	☐ Vandalism
☐ Changing Lanes Collision	☐ Windshield
☐ Passing and/or Turning Collision	☐ Failed to Yield Right of Way
	☐ Other: _____

Supervisor Signature: _____ Date: _____

Employee Signature: _____ Date: _____

This report must be submitted to the owner by the end of the workday on which the accident occurred.

5. PPE HAZARD ASSESSMENT FORM

**COX ENERGY, INDUSTRIAL
COATINGS & CLEANING, LLC**

**Personal Protective Equipment (PPE)
Hazard Assessment Certificate
Instructions**

Based on the hierarchy of controls, PPE is a last resort. Personal protective equipment alone should **not** be relied upon to provide protection against hazards but should be used in conjunction with engineering controls, administrative controls, and procedural controls.

This document addresses eye, face, head, hand, foot, torso, respiratory, noise, and fall protection. It will serve as the Personal Protective Equipment (PPE) Certification document required to satisfy the federal requirements of the Occupational Safety and Health Administration (OSHA) Standard, 29 CFR 1910.132 Subpart I- Personal Protective Equipment.

General Guidelines

The PPE Hazard Assessment can be conducted for an area, a job category or for an individual by selecting and filling in the appropriate box. The assigned evaluator shall include their name, department/division being assessed, and the date. Completed assessments must be accessible to employees and inspectors and updated when needed.

PPE HAZARD ASSESSMENT INSTRUCTIONS

STEP 1: INFORM AFFECTED EMPLOYEES OF THE PROCESS:

Affected employees from each work area that is being assessed should be involved in the process. Discuss the reasons for the survey and the procedures being used for the assessment. Review the job procedures, potential hazards and the PPE currently in use.

STEP 2: REVIEW DATA:

Reports of work-related injuries or illnesses, near-miss events and reported safety concerns are sources of data that can provide

helpful information for assessing hazards.

STEP 3: CONDUCT A WALK-THROUGH SURVEY:

The purpose of the survey is to identify sources of hazards to employees. Observe the following: layout of the workplace, location of the employees, work operations, hazards and places where PPE is currently used including the device and reason for use. Using the form, check the type of hazard(s) present within each section (organized by body part). Further descriptions can be provided in the adjacent box. Consideration should be given to the following basic hazard categories:

1. Impact (falling/flying objects)
2. Penetration (sharp objects piercing foot/hand)
3. Compression (roll-over or pinching objects)
4. Chemical exposure (inhalation, ingestion, skin contact, eye contact or injection)
5. Temperature extremes (heat/cold)
6. Dust/flying debris (grinding, chipping, sanding, etc.)
7. Fall (slip/trip, scaffolds, elevated work)
8. Radiation (non-ionizing: UV/IR/light, welding, brazing, cutting, furnaces, etc.)
9. Noise (mechanical rooms, machines, cage washing, jackhammers, etc.)
10. Electrical (shock, short circuit, arcing, static)

STEP 4: SELECT PPE:

After considering and/or planning for other controls, select the PPE which provides at least the minimum level of protection required to protect employees from the hazards. Using the form, note the appropriate PPE in the required PPE box.

STEP 5: MAKE DOCUMENT ACCESSIBLE:

Once completed, signed and dated, store the form either electronically or as a hard copy in a location easily accessible to employees and inspectors.

STEP 6: REVISE PROTOCOL:

Update departmental protocols with the new or modified PPE requirements if applicable.

STEP 7: REASSESS THE WORKPLACE AS NECESSARY BY IDENTIFYING AND EVALUATING:

1. New equipment and processes
2. Accident records
3. Suitability of previously selected PPE

See the attached completed example of the PPE Hazard Assessment Certificate.

For questions regarding this procedure, please contact the main office at (304) 932-4333, 30 Chase Drive, Hurricane, WV 25526.

PPE HAZARD ASSESSMENT FORM

I am reviewing (check the appropriate box):	☐ A worksite	Specify location:
	☐ A single employee's job description	Name of employee:
	☐ A job description for a class of employees	Position Title:
		Position Titles: Location:
Your Name:		Department/Division:
Date:		
EYE HAZARDS: Tasks that can cause eye injury include: working with chemicals or acids; UV lights; chipping, sanding, or grinding; welding; furnace operations; and metal and wood working.		
	Check the appropriate box for each hazard:	Description of hazard(s):
	Chemical Exposure ☐	
	High Heat/Cold ☐	
	Dust/Flying Debris ☐	
	Impact ☐	
	UV/IR Radiation ☐	
	Other: ☐	
HEAD/NECK/FACE HAZARDS: Tasks that can cause head/neck/face injury include: working below other workers who are using tools or materials that could fall, working on energized electrical equipment or utilities, and working in trenches or confined spaces.		
	Check the appropriate box for each hazard:	Description of hazard(s):
	Chemical Exposure ☐	
	Dust/Flying Debris ☐	
	Impact ☐	
	UV/IR Radiation ☐	
	Electrical Shock ☐	
	Other: ☐	
FOOT HAZARDS: Tasks that can cause foot injury include: exposure to chemicals or acids, welding or cutting, materials handling, renovation or construction, and electrical work.		
	Check the appropriate box for each hazard:	Description of hazard(s):
	Chemical Exposure ☐	
	High Heat/Cold ☐	
	Impact/Compression ☐	
	Electrical ☐	
	Puncture ☐	
	Slippery/Wet Surfaces ☐	
Other: ☐		
Required PPE		

PPE HAZARD ASSESSMENT CERTIFICATE

HAND HAZARDS: Hand injury can be caused by: work with chemicals, acids, exposure to cut or abrasion hazards (for example, during demolition, renovation, woodworking, or food service preparation), work with very hot or cold objects or materials, and exposure to sharps.

Check the appropriate box for each hazard:		Description of hazard(s):	Required PPE
	Chemical Exposure ☐		
	High Heat/Cold ☐		
	UV/IR Radiation ☐		
	Electrical Shock ☐		
	Puncture ☐		
	Cuts/Abrasion ☐		
	Other: ☐		

BODY HAZARDS: Injury of the body (torso, arms, or legs) can occur during: exposure to chemicals, acids, or other hazardous materials; abrasive blasting; welding, cutting, or brazing; chipping, sanding, or grinding; use of chainsaws or similar equipment; and work around electrical arcs.

Check the appropriate box for each hazard:		Description of hazard(s):	Required PPE
	Chemical Exposure ☐		
	High Heat/Cold ☐		
	Impact/Compression ☐		
	Electrical Arc ☐		
	Cuts/Abrasion ☐		
	Other: ☐		

FALL HAZARDS: Personnel may be exposed to fall hazards when performing work on a surface with an unprotected side or edge that is 4 feet or more above a lower level, or 10 feet or more on scaffolds. Fall protection may also be required when using vehicle man lifts, elevated platforms, tree trimming, performing work on poles, roofs, or fixed ladders.

Check the appropriate box for each hazard:		Description of hazard(s):	Required PPE
	Fall hazard ☐		

NOISE HAZARDS: Personnel may be exposed to noise hazards when working in mechanical rooms; machining; grinding; sanding; cage washing; dish washing; working around pneumatic equipment, grounds equipment, generators, chillers, motors, saws, jackhammers, or similar equipment.

Check the appropriate box for each hazard:		Description of hazard(s):	Required PPE
	Noise hazard ☐		

RESPIRATORY HAZARDS: Personnel may be exposed to respiratory hazards that require the use of respirators: during emergency response, when using certain chemicals outside of a chemical fume hood; when working with hazardous powders; when entering fume hood plenums, when working with animals; when applying paints or chemicals in confined spaces; when welding, cutting, or brazing on certain metals; and when disturbing asbestos, lead, silica, or other particulate hazards.

Check the appropriate box for each hazard:		Description of hazard(s):	Required PPE
	Chemical exposure ☐		
	Particulate exposure ☐		
	Other: ☐		

I certify that the above hazard assessment was performed to the best of my knowledge and ability, based on the hazards present on this date.

(signature)

6. INCIDENT REPORT FORM

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

INCIDENT REPORT FORM

- This form to be completed for **all job-related injuries or illnesses – regardless of extent.**
- Must be completed by supervisor within 8 hours of incident.
- Main Office must receive notification within 8 hours of **all** incidents.

Name _____ Job Title _____
First Middle Last

Date of Injury:	Hour:	AM PM	Time Left Work:	AM PM	Date of Birth:
Department Name		Name of Supervisor		Date Reported to Supervisor	
Exact Location of Accident:				Name of Witness:	

Describe Accident (What was injured worker doing; what objects, machines o materials were involved):

Regular Days Off	Working Shift	AM PM	to	AM PM

Employee Signature: _____ Date: _____

☐ CHECK IF YOU BELIEVE THIS INJURY IS NOT WORK CONNECTED AND REPORT TO YOUR SUPERVISOR.

ACTION	BODY PART INJURED			NATURE OF INJURY		
☐ FIRST AID CASE ONLY	☐ HEAD	☐ FACE	☐ EYE	☐ ABRASION	☐ LACERATION	☐ PUNCTURE
☐ REQUIRED DOCTOR'S CARE	☐ NECK	☐ BACK	☐ CHEST	☐ BRUISE	☐ FRACTURE	☐ BURN
☐ HOSPITALIZED	☐ ARM	☐ HAND	☐ FINGER	☐ SPRAIN/STRAIN	☐ FOREIGN BODY	☐ POISON OAK
☐ OSHA NOTIFIED	☐ LEG	☐ KNEE	☐ ANKLE	☐ COLD INJURY	☐ HEAT NJURY	☐ DEMATITIS
☐ TIME LOSS	☐ FOOT	☐ TOE		☐ LOSS OF	☐ OCCUPATIONAL	
☐ NO INJURY/NEAR MISS	☐ OTHER _____			CONCIOUSNESS	ILLNESS	
				☐ OTHER _____		

ADDITIONAL NOTES

SUPERVISORS MUST COMPLETE OTHER SIDE

SUPERVISOR'S INVESTIGATION OF CAUSE (CHECK ONE

OR MORE)

If the employee is admitted to the hospital, OSHA must also be contacted within 24 hours. This is a supervisor's responsibility – Call OSHA.

Did you personally view the incident site? ☐ Yes ☐ No

UNSAFE ACTS

☐ OPERATING WITHOUT AUTHORITY	☐ HORSEPLAY
☐ FAILURE TO WARN OTHERS	☐ FAILURE TO USE PERSONAL PROTECTIVE DEVICES
☐ OPERATING OR WORKING AT UNSAFE SPEED	☐ FAILURE TO OBSERVE SAFETY REGULATIONS
☐ MAKING SAFETY DEVICES INOPERATIVE	☐ LACK OF TRAINING OR KNOWLEDGE
☐ FAILURE TO SECURE OBJECTS	☐ PREVENTABLE VEHICLE ACCIDENT
☐ USING UNSAFE EQUIPMENT OR EQUIPMENT UNSAFELY	☐ SLIPS AND FALLS
☐ UNSAFE LOADING, MIXING, CARRYING	☐ FAILURE TO LOCK OUT/TAG OUT
☐ TAKING UNSAFE POSITION OR POSTURE	☐ OTHER: _____

UNSAFE CONDITIONS

☐ IMPROPERLY GUARDED EQUIPMENT OR MACHINE	☐ INADEQUATE WARNING SYSTEM
☐ DEFECTIVE TOOL OR EQUIPMENT	☐ HAZARDOUS STORAGE OR ARRANGEMENT
☐ POOR HOUSEKEEPING	☐ HAZARDOUS DRESS OR APPAREL
☐ IMPROPER LIGHTING	☐ HAZARDOUS WORK PROCEDURE
☐ IMPROPER VENTILATION (DUST, FUMES, ETC.)	☐ HAZARDOUS WEATHER OR ENVIRONMENT
☐ UNSAFE DESIGN OR CONSTRUCTION	☐ CONTACT WITH POISONOUS PLANTS, INSECTS, TOXIC CHEMICALS, SKIN IRRITANTS, BITES, ECT.
☐ SLIPPERY OR OTHER UNSAFE SURFACE	☐ OTHER: _____

- REASONS FOR UNSAFE ACT (Must be completed by Supervisor)

- REASONS FOR UNSAFE CONDITION (Must be completed by Supervisor)

- WHAT PRACTICAL CORRECTIVE ACTION WILL BE TAKEN BY SUPERVISION TO PREVENT RECURRENCE? (Must be completed by Supervisor.)

SUPERVISOR'S SIGNATURE _____

DATE _____

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

30 Chase Drive Hurricane, WV, 25526

(304) 932-4333

7. JOB SAFETY ANALYSIS (JSA) WORKSHEET

COX ENERGY, INDUSTRIAL COATINGS & CLEANING, LLC

JOB SAFETY ANALYSIS (JSA) WORKSHEET

Date:		
Project Owner:		
Project Name:		
Project Location:		
JSA Written By:		
Work description:		
Potential Hazards (check all that apply)		
☐ Flooding	☐ Confined Spaces	☐ Fire or Explosion Potential
☐ Skin Irritants	☐ High Noise Levels	☐ Compressed Gasses/Liquid
☐ Fall Potential	☐ Ionizing Radiation	☐ Welding/Burn Operations
☐ Toxic Material	☐ Excavation Hazard	☐ Pinch, Crush or Striking Hazards
☐ Adjacent Work	☐ Elevated Load or Work	☐ Sharp Edges or Hot/Cold Surfaces
☐ Lifting Hazard	☐ Inadequate Ventilation	☐ Hazardous Chemical Exposure/MSDS
☐ Difficult Access	☐ Water/Drowning Hazard	☐ Electrical Shock/Energized Equipment
☐ Shoring/Sloping	☐ Environmental Extremes	☐ Potential Release of Energy Kinetic/Gravity
☐ Traffic/Vibration	☐ Employees/New or Temp	☐ Lead Exposure
Personal Protective Equipment, Special Tools & Other Equipment (check all that apply)		
☐ Hard Hats	☐ Safety Footwear	☐ Standard Operating Procedures
☐ Respirators	☐ Ear Protection	☐ Review of Emergency Action Plans
☐ Eye Protection	☐ Personal Grounds	☐ Special Pre-Job Safety Discussions
☐ Air Lines/Hoses	☐ Coveralls/Clothing	☐ Hot Work Permit; Electrical/Welding
☐ Face Protection		
Special Precautions (check all that apply)		
☐ Simultaneous Operations	☐ Near Miss Reports/Incidents	Electrical Powerline Issues
☐ Pollution Prevention Measures	☐ Hazardous Waste Disposal	☐ Overhead or Underground power lines
☐ Redundant Protective Measures	☐ Dig Alert (call 811 before digging)	☐ Overhead power lines within 100' of work site
☐ Special Pre-Job Safety Discussions		

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8. Excavation Procedure Checklist

COX ENERGY'S EXCAVATION PROCEDURE CHECKLIST

Note: If any questions are answered No, the excavation shall not proceed

Planning		Yes	No	N/A
1	Have applicable crossing agreements /approvals, access been obtained, & required notifications completed?			
2	Have all applicable drawings been reviewed (As-builts, alignment sheets, plot plans, fuel gas, electrical, etc.)?			
3	Has a "One-Call" been completed where available and has the excavation area been white-lined?			
4	Have all owners of buried facilities that are not One-Call members been contacted directly?			
5	Have all owners of buried facilities properly located and marked their underground facilities in the search area? (Obtain stakeout reports whenever possible.)			
6	Have all TransCanada underground facilities been properly marked; using the most appropriate methods?			
7	Has a survey sweep been completed to identify ALL underground facilities in the search area?			
8	Has a Stake-out Report/Ground Disturbance Approval (clearly identifying the safe work area) been completed and discussed with the locator to identify any problems or concerns with the locate?			
9	Has the "search" area been visually inspected for signs of additional buried facilities & have any discrepancies between visual observations, underground facility records, and locate marks been addressed?			
10	Have roles and responsibilities been communicated to applicable workers (Excavation Procedure reviewed, hand-signals agreed upon) and have workers participated in a JSA to address excavation hazards?			
11	Has the competency of the equipment Operator, Signaller, and Excavation Coordinator been validated?			
12	(Canada only) Has Technical Services been consulted to determine Safe Excavation pressure (mandatory for ALL mechanical excavation of pipe and soft excavation below springline)? Safe Excavation Pressure Required? (YES / NO) : Pressure: _____ (KPA / PSI)			
13	Has Engineering (Integrity Engineering Services (US), Technical Services (CA), Pipe Integrity (MEX)) been consulted for safe dig pressure for known or suspected integrity concerns (equipment weights over pipeline, leaks, corrosion, unusual/unexpected frozen ground, and unsupported pipe, etc.)? Safe Excavation Pressure Required? (YES / NO) : Pressure: _____ (KPA / PSI)			
14	Has a soil evaluation been completed to determine soil type or defaulted to Type C - 1 ½ H to 1V (34°)?			
15	Has the qualification of all workers performing OQ covered tasks been verified? (U.S. only)			
16	Has an Environmental Resource been consulted to address any potential concerns (contaminated soil or groundwater, PCB or asbestos containing coating, pipeline liquids, etc)?			
17	Does the JSA address finding known or potential contaminated soils, groundwater, or hazardous materials?			
18	Have aboveground facilities within 10m (30ft) of the excavation been marked?			
19	Has an approved plan been developed to manage disposal of hydrovac slurry?			
20	Is ramping required? (Additional cover over pipe, swamp mats, etc.) Have they been correctly installed? Contact Pipe Engineering – Damage Prevention to ensure acceptable weights of equipment working over pipeline.			
21	If overhead power lines are present; are Overhead Power line warning signs and goalposts in place as per the overhead power line TOP and has an additional signaller been designated for working near power lines?			
Excavation		Yes	No	N/A
22	Has the buried facility been hand excavated (or hydro-vac) sufficiently to confirm location and alignment?			
23	Is it understood; that at all times during mechanical excavation the top and side of the facility being excavated must be kept visible?			
	Have all underground facilities within 5m (Canada/Mexico) / 15ft (U.S.) from the edge of the proposed ground disturbance been located and hand excavated to confirm their horizontal location and alignment?			

Excavation		Yes	No	N/A
	Is it understood that a signaller shall direct the Operator during all mechanical excavation activity (includes topsoil stripping & backfill) & during equipment operation that may pose a hazard to workers close by?			
26	Manager and Integrity / Technical Support approval has been obtained if mechanical excavation is required within 450mm (18 inches) of a buried facility?			
27	Have workers been informed that they have the authority and obligation to stop work if the activity is deemed to be unsafe? Has the universal stop hand signal been communicated?			
28	Has the excavation equipment been deemed appropriate for the work site conditions and hazards? (excavator size and condition, etc) Buckets with side cutters are not permissible.			
29	If working inside a fenced facility; has a perimeter slit trench (including the excavation slope area) and a centre line slit trench along all buried facilities encountered in the excavation area been completed?			
30	Prior to entering an excavation, has the excavation been assessed and determined safe (slope angle, signs of cracking, gas monitoring < 10% L.E.L., etc) and documented? Refer to Excavation Inspection Form.			
31	Does the excavation have appropriate/adequate access and egress, such as step cut-ins, ladders or other means every 15m (50ft)? Maximum lateral distance a worker can travel to an egress is 7.5m (25 feet).			
32	Has any excavation over 4ft (1.2m) deep been assessed as per the confined space procedure?			
33	Does the slope of excavations meet requirements outlined in the Excavation Procedure or are Engineered/certified support systems required (trench box, etc.) to protect workers entering the excavation?			
34	If the excavation is over 20ft (6m) deep or requires an engineered support system, has a Registered Professional Engineer approved the protective systems?			
35	If water control is necessary, has appropriate mitigation been implemented? (Water pumps, sand points, etc)			
36	Is the slope of the spoil / top soil pile (less than) ≤ 45 degrees from horizontal, and has a 1.2m (4 foot) separation from the edge of the excavation to any material and/or the spoil pile been maintained?			
	Spoil piles shall not be located over buried facilities unless absolutely necessary. Are appropriate controls in place for spoil piles located over buried facilities to prevent removal of existing cover/damage to facilities?			
38	Is it understood that mechanical equipment is not allowed within 3m (10ft) of the edge of the excavation unless banks have been inspected for stability and are frequently monitored?			
39	Have adequate fencing/barriers/signage/traffic control measures (as required) been installed?			
40	Is it understood that if contact is made or suspected with any buried or aboveground facility during mechanical excavation, Stop all Work at the site immediately, shut down all powered equipment and ignition sources. Evacuate and contact Management and Facility Owners immediately.			
One-Call Ticket #		Date		
Buried Facility Owner & Facility		Contact Name		Contact Phone Number
Other Comments				