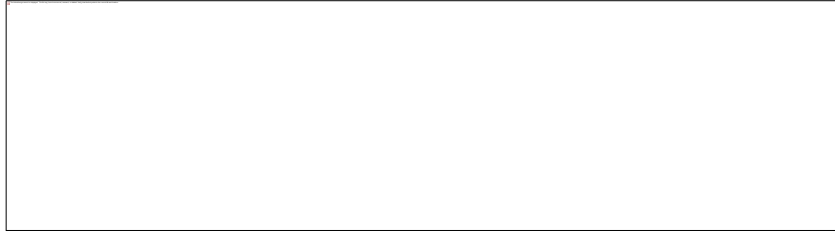


KENT MATERIALS



HEALTH AND SAFETY MANUAL

Port Allen Louisiana

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The success of Kent Materials is based upon our dedication to health, safety and the environment, and our desire to provide the highest quality products and services available to our customers. We will not compromise the quality of our services for any reason and will stay in the forefront of health, safety and environmental issues, and regulatory and technological changes in our industry.

Kent Materials will

- comply with applicable laws, standards and best practices governing occupational health, safety and the environment;
- provide a healthful, safe and environmentally-friendly workplace for employees and others affected by our activities;
- maintain an on-going process of workplace hazard identification and abatement to ensure that the workplace is healthy, safe and environmentally-friendly;
- advise employees of their roles and responsibilities to meet health, safety and environmental standards and best practices;
- provide employee and owner-operator training in healthful, safe work practices and environmental protection;
- motivate employees to take personal responsibility for their safety and the safety of their co-workers;
- manage health, safety and environmental issues like any other aspect of our business, by establishing goals and objectives for continuous improvement;
- conduct periodic health, safety and environmental performance audits to ensure compliance and effective implementation of existing laws, standards and best practices;
- devote sufficient resources to ensure exceptional health, safety and environmental performance;
- ensure that all employees and owner-operators comply with all health, safety and environmental laws, standards and best practices;
- ensure that drivers and equipment operators are properly qualified and safe while they operate company equipment; and
- ensure that all employees and owner-operators report any health, safety and environmental hazards and incidents to their supervisor or management immediately.

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 Security Plan

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	ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS	Rev. date 4/19/2011

The Access to Employee Exposure and Medical Records Plan provides information to Kent Materials (KM) employees and their designated representatives regarding their rights of access to employee exposure and medical records, pursuant to 29 CFR, Subtitle B, 1910.1020, concerning toxic and hazardous substances. [The web address for a current copy of the standard is www.osha.gov Search “1910.1020”; double click “1910.1020 Access to employee exposure and medical records”.] KM is responsible for assuring compliance with the standard, but the activities involved in complying with the access to medical records provisions are carried out by KM personnel or by the physician or other health care personnel in charge of the KM employees’ exposure and medical records. The KM Plan includes the following elements, as presented in the standard:

- *Preservation of records*
- *Access to Records*
- *Employee information*
- *Transfer of records*
- *Definitions*

PRESERVATION AND RETENTION OF RECORDS

KM maintains employees’ medical records and exposure records at the Port Allen office, and keeps records in confidence at this location. Appropriate records for each employee *are preserved and maintained for at least the duration of employment plus thirty (30) years.*

The following employee medical records *need not be retained for any spec time period*: health insurance claims records maintained separately from KM individual medical insurance program and its records; first aid records (not including medical histories) of one-time treatment and subsequent observation of minor scratches, cuts, burns, splinters, and the like which do not involve medical treatment, loss of consciousness, restriction of work or motion, or transfer to another job, if made on-site by a non-physician and if maintained separately from KM’s medical program and its records; the medical records of employees who have worked for less than (t) year for KM *need not be retained beyond the term of employment* if they are provided to the employee upon the termination of employment.

The following KM employee records *are retained for only one (1) year*: background data to environmental (workplace) monitoring or measuring, such as laboratory reports and worksheets, as long as the sampling results, the collection methodology (sampling plan), a description of the analytical and mathematical methods used, and a summary of other background data relevant to interpretation of the results obtained are retained for at least thirty (30) years.

Material safety data sheets and records concerning the identity of a substance or agent *are not retained for any specific period* as long as some record of the identity (chemical name if known) of the substance or agent, where it was used and when it was used, is retained for at least thirty (30) years. Biological monitoring results designated as exposure records by specific occupational safety and health standards *are preserved and maintained* as required by the specific standard. Each analysis using exposure or medical records *are preserved and maintained* for at least thirty (30) years.

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ACCESS TO RECORDS

A request for access to KM employee exposure and medical records by the KM employee is given immediate attention. KM employee requests an Access to Employee Exposure and Medical Records form (see attached) from their supervisor or a staff member (office) to help with the speed and accuracy of their request. If necessary, the employee receives assistance to complete the form from his supervisor or a staff member, as soon as is practical. Every effort is made to accommodate the KM employee to maximize convenience for the KM employee or his/her designated representative without compromising the integrity of the regulation. Whenever a KM employee or designated representative requests access to a record, KM assures its employees that access is provided in a reasonable time, place and manner. If KM cannot reasonably provide access to the record within fifteen (15) working days, KM apprises the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record will be made available.

Whenever an employee or designated representative requests a copy of a record, KM assures that: a copy of the record is provided without cost to the employee or representative, the necessary mechanical copying facilities (e.g., photocopying) are made available without cost to the employee or representative for copying the record, or the record is loaned to the employee or representative for a reasonable time to enable a copy to be made. In the case of an original X-ray, KM may restrict access to on-site examination or make other suitable arrangements for the temporary loan of the X-ray. Whenever a record has been previously provided without cost to an employee or designated representative, KM may charge reasonable, non-discriminatory administrative costs (i.e., search and copy expenses but not including overhead expenses) for a request by the employee or designated representative for additional copies of the record.

EMPLOYEE INFORMATION

Upon an employee first entering into employment, and at least annually thereafter, KM informs employees covered by this section of the following: the existence, location and availability of any records covered by this section; the person responsible for maintaining and providing access to records; and each employee's rights of access to these records. KM keeps a copy of this section and its appendices, and makes copies readily available, upon request, to employees. KM also distributes to current employees any informational materials concerning this section that are made available to KM by OSHA.

TRANSFER OF RECORDS

Whenever KM ceases to do business, it shall transfer all records subject to this section to the successor employer; the successor employer shall receive and maintain these records. Whenever KM ceases to do business and there is no successor employer to receive and maintain the records subject to this standard, KM shall notify, the affected current and past employees of their rights of access to records at least three (3) months prior to the cessation of its business.

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DEFINITIONS

Access means the right and opportunity to examine and copy.

Analysis using exposure or medical records means any compilation of data or any statistical study based at least in part on information collected from individual company employee exposure or medical records or information collected from health insurance claims records, provided that either the analysis has been reported to the employer or no further work is currently being done by the person responsible for preparing the analysis.

Designated representative means any individual or organization to which an employee gives written authorization to exercise a right of access.

Employee means a current employee, a former employee, or an employee being assigned or transferred to work where there will be exposure to toxic substances or harmful physical agents. In the case of a deceased or legally incapacitated employee, the employees' legal representative may directly exercise all the employees' rights under this section.

Employee exposure record means a record containing any of the following kinds of information: *environmental (workplace) monitoring or measuring* of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained; *biological monitoring* results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the levels 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 employees' use of alcohol or drugs; *material safety data sheets* indicating that the material may pose a hazard to human health; or a *chemical inventory* or any other record which reveals where and when used and the identity (e.g., chemical, common or trade name) of a toxic substance or harmful physical agent.

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, including: medical and employment questionnaires or histories (including job description and occupational exposures), the results of medical examinations (pre-employment, pre-assignment, periodic, or episodic) and laboratory tests (including chest and other X-ray examinations taken for the purposes of establishing a base-line or detecting occupational illness, and all biological monitoring not defined as an employee exposure record), medical opinions, diagnoses, progress notes, and recommendations, first aid records, descriptions of treatments and prescriptions, and employee medical complaints.

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Employee medical record *does not include* medical information in the form of: *physical specimens* (e.g., blood or urine samples) which are routinely discarded as a part of normal medical practice; or *records concerning health insurance claims* if maintained separately from the employers' medical program and its records, and not accessible to the employer by employee name or other direct personal identifier (e.g., social security number, payroll number, etc.); or *records created solely in preparation for litigation* which are privileged from discovery under the applicable rules of procedure or evidence; or *records concerning voluntary employee assistance programs* (alcohol, drug abuse, or personal counseling programs) if maintained separately from the employees' medical insurance program and its records.

Employer means a current employer, a former employer, or a successor (future) employer.

Exposure or exposed means that an employee is subjected to a toxic substance or harmful physical agent in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes past exposure and potential (e.g., accidental or possible) exposure, but does not include situations where the employer can demonstrate that the toxic substance or harmful physical agent is not used, handled, stored, generated, or present in the workplace in any manner different from typical non-occupational situations.

Health Professional means a physician, occupational health nurse, industrial hygienist, toxicologist, or epidemiologist, providing medical or other occupational health services to exposed company or contracted employees.

Record means any item, collection, or grouping of information regardless of the form or process by which it is maintained (e.g., paper document, microfiche, microfilm, X-ray film, or automated data processing).

Specific chemical identity means the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

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Specific written consent means a written authorization containing the following: the name and signature of the employee authorizing the release of medical information, the date of the written authorization, the name of the individual or organization that is authorized to release the medical information, the name of the designated representative (individual or organization) that is authorized to receive the released information, a general description of the medical information that is authorized to be released, a general description of the purpose for the release of the medical information, and a date or condition upon which the written authorization will expire (if less than one year). A written authorization does not operate to authorize the release of medical information not in existence on the date of written authorization, unless the release of future information is expressly authorized, and does not operate for more than one year from the date of written authorization. A written authorization may be revoked in writing prospectively at any time.

Toxic substance or harmful physical agent means any chemical substance, biological agent (bacteria, virus, fungus, etc.), or physical stress (noise, heat, cold, vibration, repetitive motion, ionizing and non-ionizing radiation, hypo- or hyper baric pressure, etc.) which is listed in the last printed edition of the National Institute for Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RIECS); or has yielded positive evidence of an acute or chronic health hazard in testing conducted by, or known to, the employer; or is the subject of a material safety data sheet kept by or known to the employer indicating that the material may pose a hazard to human health.

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**WRITTEN AUTHORIZATION FOR THE RELEASE OF
EMPLOYEE EXPOSURE AND MEDICAL RECORDS**

I, _____, hereby authorize Kent Materials and its
 (Print Full Name of Employee)
 representative _____
 (Print Name of Individual or Organization Authorized to Release Records)
 to release to _____
 (Print Name of Individual or Organization Receiving Records)
 the following medical information from my personal medical records (describe in detail):

I give my permission for this medical information to be used for the following (describe):

 Name of Employee or Representative

 Name of Person Releasing Records

 Signature of Employee or Representative

 Signature of Person Releasing Records

 Date Written Authorization Expires

 Date of Signatures

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	CONFINED SPACE (PERMIT REQUIRED)	Rev. date 4/19/2011

Kent Materials (KM) evaluated the various workplaces within its operations and determined that it has confined spaces; a “confined space” is defined as a space that:

- Is large enough and so configured that an employee can bodily enter and perform assigned work; and
- Has limited or restricted means for entry or exit (for example, tanks, vessels, storage areas, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous employee occupancy.

Entry into a confined space as defined above is not hazardous and is not addressed and does not apply under this Program. (A confined space becomes hazardous when other conditions exist, such as a hazardous atmosphere, engulfment potential, etc.)

KM has also determined that it has permit-required confined spaces that its employees (and possibly its contractor employees) enter. A “permit-required confined space” is defined as a confined space that has one or more of the following characteristics:

- Contains or has a potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an entrant.
- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or floor that slopes downward and tapers to a small section.
- Contains any other recognized serious safety or health hazards.

KM has confined spaces that contain other recognized serious safety and health hazards (vessels/containers). Therefore, KM developed and implemented a written permit space program, which is available for inspection by its employees and their authorized representatives. KM informs all of the exposed employees of the existence and location of and the danger posed by the permit spaces by posting danger signs.

[The web address for a current copy of the OSHA standard is www.gpo.gov/ecfr scroll down to and click “Title 29

–Labor”; click “Go”; click “1900-1910”; click “1910”; click “1910.146 Permit-required confined spaces”.]

Written Program

KM reviews its entry operations when it has reason to believe that the measures taken under the permit-required confined space program may not protect employees, and revises the program to correct deficiencies found to exist before subsequent entries are authorized. Examples include unauthorized entry of a permit space, the detection of a permit space hazard not covered by the permit, the occurrence of an injury or near-miss during entry, or an employee complains about the effectiveness of the program. KM accomplishes the following through its permit-required confined space program (in addition, see *Confined Space Policy and Procedure*):

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- Develops and implements the means, procedures and practices necessary for safe permit space entry operations: specifying acceptable entry conditions, allowing the observation of any monitoring or testing, isolating the permit space, eliminating or controlling atmospheric hazards, protecting entrants from external hazards, and verifying conditions in the permit space are acceptable for entry.
- Provides, maintains and ensures that employees use the following equipment properly: testing and monitoring equipment, ventilating equipment, communications equipment, personal protective equipment, lighting equipment, barriers and shields, equipment needed for safe ingress and egress, rescue and emergency equipment, and any other equipment for safe entry and rescue.
- Implements measures necessary to prevent unauthorized entry.
- Identifies and evaluates the hazards of the permit spaces before employees enter them.
- Evaluates permit space conditions when entry operations are conducted: test conditions prior to and during entry operations, test for oxygen first then combustible and toxic gases and vapors, re-evaluate the permit space if an employee or his representative has reason to believe that the tests were inadequate.
- Provides at least one attendant outside the permit space for the duration of the entry operations.

Note: KM does not allow one attendant to monitor more than one permit space at a time.

- Designates the employees who will be the authorized entrant(s), attendant(s) and entry supervisor for entry operations, identifies the duties of each employee, and provides each employee with the training required.
- Develops and implements procedures for summoning rescue and emergency service, for rescuing entrants, for providing emergency services, and for preventing unauthorized personnel from attempting a rescue.
- Develops and implements a system for the preparation, issuance, use and cancellation of entry permits.
- Develops and implements procedures to coordinate entry operations when more than one employer is involved in the entry operations.
- Develops and implements procedures for concluding the entry after operations have been completed.

KM reviews the permit-required confined space program using the cancelled permits within one year after each entry and revises its program as necessary, to ensure that employees participating in entry operations are protected from permit space hazards. KM performs a single annual review covering all entries performed during a 12-month period; if no entries are performed during the 12-month period, no review is conducted.

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Contractors

When KM arranges to have employees of another employer (contractor) perform work that involves a permit-required confined space, KM informs the contractor that permit space entry is allowed only through compliance with a permit space program, appraises the contractor of the hazards that make the space a permit space, appraises the contractor of any precautions or procedures that protect employees, coordinates entry operations with the contractor when both are working in the same permit space, and debrief the contractor at the conclusion of the entry operations.

In addition, KM requires and ensures that each contractor who is retained to perform permit space entry operations obtains any available information regarding the permit space hazards and entry operations of KM, coordinates entry operations with KM when both are working in the same permit space, and informs KM of the permit space program the contractor will follow.

Permit System

Before entry is authorized, KM employees complete an entry permit; the entry permit identifies the following:

- The permit space to be entered;
- The purpose of the entry;
- The date and the authorized duration of the entry permit;
- The authorized entrants within the permit space, by name, to enable the attendant to determine quickly and accurately which authorized entrants are within the permit space;
- The personnel by name currently serving as attendants;
- The individual by name currently serving as entry supervisor, with a space for the signature or initials of the entry supervisor who originally authorized entry;
- The hazards of the permit space to be entered;
- The measures used to isolate the permit space and to eliminate or control permit space hazards before entry (purging, inverting, flushing or ventilating);
- The acceptable entry conditions;
- The results of the initial and periodic tests performed (oxygen, combustible gases and vapors, and toxic gases and vapors);
- The rescue and emergency services that can be summoned and the means for summoning those services;
- The communication procedures used by authorized entrants and attendants to maintain contact during the entry;
- Equipment to be provided for compliance with this section;
- Any other information whose inclusion is necessary in order to ensure employee safety; and
- Any additional permits (hot work, permit-to-work, etc.) that have been issued to authorize work in the permit space.

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Before entry occurs, the entry supervisor identified on the permit signs the entry permit to authorize entry. The completed permit is available at the time of entry to all authorized entrants or their authorized representatives, by posting it at the entry portal or by any other equally effective means, so that the entrants can confirm that pre-entry preparations are complete. The duration of the KM permit does not exceed the time required to complete the assigned task or job identified on the permit. The entry supervisor terminates entry or cancels the entry permit when:

- The entry operations covered by the entry permit have been completed, or
- The condition that is not allowed under the entry permit arises in or near the permit space.

KM retains each canceled entry permit for at least one year to facilitate the review of the permit- required confined space program. Any problems encountered during an entry operation are noted on the applicable permit so that appropriate revisions to the permit space program can be made.

Duties of Authorized Participants

KM ensures that all of the authorized entrants, attendants, and entry supervisors know their duties regarding permit-required confined space entry operations (see *Confined Space Policy and Procedure*).

Rescue and Emergency Services

KM has elected to designate a rescue and emergency service for rescue within a confined space where non-entry rescue cannot be accomplished, has evaluated the service's ability to respond to a rescue summons in a timely manner (considering the hazards in KM confined spaces), has evaluated the service's ability in terms of proficiency with rescue-related tasks and equipment, and has selected the Port Allen Fire Department that:

- Has the capability to reach victim(s) within a time frame that is appropriate for the permit space hazards identified within KM,
- Is equipped for and proficient in performing the needed rescue services.

KM informs the Port Allen Fire Department of the hazards they may confront when called on to perform rescue at the site and provides them access to all permit spaces from which rescue may be necessary.

Note: KM employees do not rescue victim(s) from permit-required confined spaces unless they are properly trained in the use of SCBAs and authorized by KM to attempt a rescue.

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KM employees **can** facilitate non-entry rescue by using retrieval systems or methods whenever **an authorized entrant enters** a permit space, unless the retrieval equipment increases the overall risk of entry or does not contribute to the rescue of the entrant. If retrieval systems are used, they must meet the following requirements:

- Each authorized entrant uses a chest or full body harness with a retrieval line attached at the center of the entrant's back near shoulder level, above the entrant's head, or at another point which presents a profile small enough for the successful removal of the entrant. Wristlets are used instead of the harness when the use of a harness is infeasible or creates a greater hazard and that the use of wristlets is the safest and most effective alternative.
- The other end of the retrieval line is attached to a mechanical device or fixed point outside the permit space in such a manner that rescue begins as soon as the rescuer becomes aware that rescue is necessary. A mechanical device is available to retrieve personnel from vertical type permit spaces more than five feet deep.

Training

KM provides training so that all exposed employees acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned to them. Training is provided to each affected employee before the employee is first assigned duties under the confined space program, before there is a change in assigned duties, whenever there is a change in permit space operations that presents a hazard about which an employee has not previously been trained, and wherever KM has reason to believe there are deviations from the permit space entry procedures or there are inadequacies in the employee's knowledge or use of these procedures. The training establishes employee efficiency in the duties required and introduces new or revised procedures. KM certifies that the training has been accomplished; the certification contains the employee's name, signatures or initials of the instructors, and the dates of the training, and is available for inspection by the employees or their authorized representatives (see *Confined Space Policy and Procedure*).

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	DOT DRUG AND ALCOHOL	Rev. date 4/19/2011

Purpose

The Drug and Alcohol Policy and Procedure provides Kent Materials with a means to ensure that our employees and owner-operators avoid the use and abuse of drugs and alcohol while working for Kent Materials. This Policy and Procedure also ensures that each covered employee and owner-operator is notified and aware of the requirements of this Policy and Procedure. Employees and owner-operators are responsible for complying with prohibitions related to illegal drugs or alcohol.

Policy

It is the policy of Kent Materials (KM) to “prohibit the manufacture, possession, sale, distribution, use, consumption, or presence of illegal drugs by employees or owner-operators at any time”, whether on or off duty. The manufacture, sale, distribution, unauthorized possession, use, consumption, or being under the influence of alcohol, unauthorized drugs or other harmful substances by employees or owner-operators when reporting for duty, on duty, or while in or on KM properties are also prohibited”.

Program Objectives

Kent Materials complies with the U.S. DOT policy for Transportation Workplace Drug/Alcohol Programs (49 CFR Part 40) to allow employees and owner-operators access to confidential counseling and/or rehabilitation programs; to detect illegal and unauthorized substance abuse in the workplace; to reduce the opportunities for accidental injuries to persons; to protect the property of the employees and owner-operators, and the general public; to prevent the occurrence of incidents, the consequences of which may drastically affect the safety and the future of operations and services; and to improve productivity, ensure quality workmanship, minimize employee and owner-operator absenteeism and tardiness, and to protect the reputation of Kent Materials within the community.

Procedures

The Kent Materials (KM) Policy and Procedure applies to all regular full-time, part-time, probationary, temporary or contract employees and owner-operators. Compliance with this policy is required as a condition of employment for qualified applicants and a condition of continued employment for employees and owner-operators. The prohibitions of this Policy and Procedure also apply to all contractors and vendors and their employees while engaged in business on KM properties.

[The web address for a copy of the DOT standard is www.gpo.gov/ecfr select Title 49, click GO; click 1-99; scroll down and click 40, then select the appropriate part.]

Note: Contract and vendor personnel are subject to the requirements contained within this Policy/Procedure; non-compliance is reported to the contract person’s employer.

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Employment Screening

Certain applicants for employment must successfully pass a drug screen before they are allowed to drive for KM. This Policy and Procedure requires that the following be completed:

1. Safety Coordinator sends applicant to the approved company Doctor or Drug and Alcohol testing location; Safety Coordinator gives applicant directions to testing location and the appropriate paperwork to bring with him/her.
2. The Doctor or testing location administers the drug test and provides the results to the HSE or Human Resource Department.
3. HSE or Human Resource will notify' the applicant of the results: if the results are negative, the employee completes the employment process; if the results are positive, the MRO will contact the employee. MRO accomplish the following:
 - Discusses results with the applicant.
 - Questions the applicant about any medical history or prescription medications to justify the positive results.
 - If no justification for the positive results, ends employment process and explains to applicant that KM is not offering him/her a job

Note: Refusal to complete the drug screen is considered equivalent to failing a drug/alcohol test.

Disqualified applicants are not eligible for employment.

Employees Subject to Testing

Employees and owner-operators performing the operations of a commercial motor vehicle are required to maintain a commercial driver's license (CDL) and are subject to drug and alcohol testing if they fall within the DOT standard found in 49 CFR Part 172. Those employees and owner-operators whose job descriptions are regulated by the DOT are considered covered positions, and include **all** truck driving positions within KM and those personnel who drive trucks as part of their roles and responsibilities; it does not include office, clerical and administrative positions.

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Prescription Drugs and Medication

Employees and owner-operators may take prescription drugs and medications while at work, provided the drugs or medications are prescribed by authorized medical practitioners for current use by the persons in possession of the medicines and do not interfere with the employee's Owner-operator's ability to perform their jobs safely.

1. Employees and owner-operators must inform their Supervisor prior to using medication on the job, especially if the medication impairs mental or physical abilities.
2. If necessary, Supervisor notifies the HSE of the medication and dosage, and if necessary, requests a determination of the person's ability to perform his/her job safely.
3. Supervisor makes a decision as to whether or not to suspend or limit the work activity of the employee or owner-operator during the period the person is taking the medication.

Employees and owner-operators must not consume prescribed drugs or over-the-counter medications more often than is directed by the physicians or found on the label. Instructions, and must not allow others to consume their medications. The burden of proof for the authorized use or possession of prescription drugs and medicines rests with the owner/user of the medications. If an employee or owner-operator is caught taking prescribed medications inappropriately, he/she is disciplined by the HSE up to and including termination.

Note: Contract personnel are subject to these prescription notifications and use requirements.

Random Testing

Testing of employees and owner-operators for drugs and alcohol in covered positions is conducted on a random basis.

1. Substance Abuse Program Manager (HSE Manager) schedules random tests with the testing organization by contacting the testing organization.
2. DOT Manager picks names randomly each quarter using the following process:
 - All of the covered employee and owner-operator names are placed in a program.
 - The program picks the number of names equal to the amount required for that quarter.
(JJ KELLER PROGRAM)

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3. Dispatcher notifies each employee or owner-operator selected as soon as possible, explains that “the employee’s or owner-operator’s name was selected randomly and that he/she is required to report immediately to the testing location to submit to a random drug or alcohol screening.

4. DOT Manager notifies the location of the names of the employees and/or the owner- operators for the drug screening and the name of the employee or owner-operator for the alcohol test, according to the following:

Drug Description	Screening Level	Confirmation Level
Marijuana (THC)	1000 ng/ml	500 ng/ml
Cocaine	150 mg/ml	100 mg/ml
Opiates	300 ng/ml	150 ng/ml
Amphetamines	500 mg/ml	250 mg/ml
Phencyclidine (PCP)	25 ng/ml	25 ng/ml
Alcohol	0.04 BAC	0.04 BAC
Methylenedioxymethamphetamine	6 am	2000 mg/ml
Synthetic Marijuana		

5. The FMCSA prohibits a driver from engaging in a safety-sensitive function when the driver uses “any controlled substance” except under the supervision of a licensed medical practitioner. 49CFR 382.213(a)

6. Employees and/or owner-operators report to the testing location either in their own vehicles or in a KM vehicle driven by the Supervisor or his/her designee.

Note: A refusal to test is considered equivalent to a positive test result.

7. Testing organization tests appropriate employees and/or owner-operators for drugs using urine samples and for alcohol using a breath test. The testing organization’s personnel notify’ the HSE of all positive and negative results, and send the proper documentation to the HSE or DOT manager.

Note: Contract and vendor personnel are subject to these random drug and alcohol testing requirements; non-compliance is reported to the contract/vendor person’s employer.

Reasonable Suspicion

Testing for reasonable suspicion is based on specific, contemporaneous, articulate and sometimes documented observations concerning the appearance, behavior, speech or body odors of an employee or owner-operator. Supervisors are trained in observation techniques in accordance with the Policy. Other factors that contribute to a determination to test because of reasonable suspicion include:

- Reliable information such as an unusual amount of accidents, incidents of theft, lost productivity, reports of unusual or unsafe behavior, or other similar facts.

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- Possession of drugs and/or alcohol, or drug paraphernalia, or such items found in an area controlled or used exclusively or predominantly by the employee.
- Arrest or conviction for a drug-related offense, the focus of a criminal investigation relating to drugs, or when information of illegal drug activities is provided.

1. Supervisor listens to those who know or have suspicions about employees and owners-operators, which might include information that employees and owner-operators are
 - involved in illegal drug activities or abusing alcohol or prescription drugs or
 - impaired as a result of possible drug or alcohol use or abuse which require others to stop work or
 - involved in off-duty illegal drug-related activities as a matter of public record or etc.
2. Supervisor makes own observations regarding the use and/or abuse of drugs or alcohol of the suspected employee or owner-operator to support the information received.
3. Supervisor completes the *Supervisor's Reasonable Suspicion/Cause Documentation Form* (see attached), and provides a copy to the HSE.
4. Supervisor discusses the suspicious behavior with the HSE, and the HSE make a determination to send or not send the employee or owner-operator to be tested.
5. If the determination is to test the employee or owner-operator for drugs and/or alcohol,
 - a. HSE Manager arranges for the test to be conducted with the testing organization and notifies the Supervisor,
 - b. Supervisor drives the employee or owner-operator to testing location and the employee is tested (within 32 hours for drugs and within two hours for alcohol, but cancels the test for alcohol if not conducted within eight hours).
 - c. After the test, Supervisor drives the employee or owner-operator back to the workplace or makes arrangements for the employee or owner-operator to get home safely.
 - d. If necessary, Supervisor prepares and maintains a record stating the reason why the test was not conducted within the prescribed time, and gives it to Safety Coordinator.
6. MRO notifies the HSE of all positive and negative results, and sends the proper documentation to the 1-ISE at the office in Port Allen.

Observations leading up to an alcohol test are made during, just proceeding or just after the period of a workday that the covered person is required to be in compliance with the Policy; observations leading up to a drug test are made during the workday.

Note: Contract and vendor personnel are subject to these reasonable suspicion testing requirements; non-compliance is reported to the contract/vendor person's employer.

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Post Accident Drug/Alcohol Testing (Accident or Unsafe Practice Testing)

Drug and alcohol tests are conducted on employees and owner-operators involved in serious or potentially serious incidents or accidents in which safety precautions or prescribed safety rules were violated, unusually careless acts were performed, prescribed personal protective equipment was not worn, KM vehicles were involved, on-the-job injuries occurred that require treatment by a medical doctor away from the scene of the incident, or unsafe job-related activities posed a danger to employees and owner-operators, others, or to the overall operations or general public.

1. Employee or owner-operator involved in an incident or accident reports it immediately to his/her Supervisor.
2. Supervisor arranges for a drug and/or alcohol test to be conducted:
 - For alcohol within two hours of the incident/accident, but cancels the test if not conducted within eight hours.
 - For drugs within 32 hours of the incident/accident.
 - a. If employee or owner-operator is taken to a clinic or hospital, the doctor is contacted to test for drugs and/or alcohol at the treatment facility using their sampling methods.
 - b. If the employee or owner-operator is not taken to a clinic or hospital, the Supervisor transports the employee or owner-operator to a testing location to test for drugs and/or alcohol.
3. Treatment facility or testing personnel notifies the HSE of all positive and negative results, and send the proper documentation to the HSE at the office in Port Allen.
Employees and owner-operators must remain available for drug and alcohol testing and may not consume any drugs or alcohol following the incident or accident, unless medicine is provided by a doctor and is necessary for the well-being of the employees. Employees and owner-operators who fail to remain available for testing are deemed to have refused to test. A refusal to test is considered equivalent to a positive test result.

Consequences of Positive Tests

1. MRO receives documentation from the treatment facility or testing organization.
2. MRO reviews the documentation, and if the results are positive for an employee or owner-operator, contacts the employee or owner-operator directly and notifies him/her of the positive results; MRO may contact the Dispatcher for assistance in contacting the employee or owner-operator quickly.

Note: If MRO cannot contact the **employee** or owner-operator after **making a reasonable** effort,

The MRO contacts the Dispatcher and they work together to give the employee or owner-operator every opportunity allowed.

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3. MRO discusses the positive findings with employee or owner-operator and gives employee or owner-operator an opportunity to present evidence to justice' the positive results (verification of prescription, medical treatment program, etc.).
4. If drug test, MRO identifies right of employee or owner-operator to have specimen reanalyzed within 72 hours: same sample, split sample, and/or use another lab; MRO describes the process for employee or owner-operator to re-analyze the specimen (at the employee's/owner-operator's expense).
5. After discussion, MRO determines if the positive results are medically justified or not: if medically justified, the MRO cancels the test and reports the results as negative to the HSE; if not justified, the MRO communicates his determination to the employee or owner-operator and reports the results "confirmed/ verified" to the HSE.
6. MRO sends a written report to the HSE; the report contains the determination, the records and documents associated with the positive test, and the reason given by the employee or owner-operator for the positive results (if any).

Employee Assistance Program (EAP)

Kent Materials encourages its employees and owner-operators to enter into a medically-supervised treatment and rehabilitation program if the results of the testing for drugs or alcohol are positive. Employees and owner-operators that use prohibited substances or abuse alcohol are urged to discontinue such practices of their own volition or to seek help before such use affects work performance or is detected by management. Voluntary participation in such a program does not jeopardize an employee's/owner-operator's employment. However, participation in a program is not considered "voluntary" if it occurs after:

- A testing-triggering event such as an incident or accident or reasonable suspicion or
- a computer list is generated with the employee's/owner-operator's name selected for random drug testing for a particular cycle.

A treatment program provides counseling and treatment as well as education and training regarding illegal drug use and alcohol abuse. The only step in the procedures is: **Contact the Substance Abuse Program Manager, disclose that you have a drug or alcohol problem, and identify that you would like to be referred for treatment.** The Substance Abuse Program Manager provides complete details and assists you in the process to receive treatment.

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Regardless of the treatment/rehabilitation program, the employee or owner-operator is responsible for successful completion of the treatment and full compliance with the after-care program, as indicated below:

Drugs

- Employees and owner-operators that have undergone a counseling or rehabilitation program for drug abuse are not allowed to return to work unless the employee or owner-operator provides proof of a negative urine test from an accredited laboratory within three days prior to the day he/she plans to return to work.
- Unannounced testing is conducted for a period of one year following his/her return to duty. The unannounced testing is done by HSE Manager in coordination with the employee's/owner-operator's Supervisor, at the employee's/owner-operator's expense.
- Upon successful completion of the one-year period, employees and owner-operators are not to be singled out for any further unannounced testing, but are tested under any other applicable provisions of the Policy.

Alcohol

- Employees and owner-operators that have tested positive for a positive alcohol concentration of greater than 0.04 are not allowed to return to duty to perform covered functions until they have successfully passed a "return-to-duty" breath alcohol test. This test must indicate a result of an alcohol concentration of less than 0.02.
- When the employee or owner-operator has a second alcohol test conducted within six months and the alcohol concentration is 0.04, the employee or owner-operator is removed from performing covered functions and disciplinary action is taken.
- Any subsequent tests at 0.04 or greater results in termination with KM.

Refusal or failure to complete an approved aftercare program, including participating in all scheduled meetings, results in additional disciplinary action, including termination.

Employee Privacy/Confidentiality

Individual expectations of privacy and confidentiality are carefully considered in maintaining a record retention program. With the exception of the testing laboratory, the MRO, the Substance Abuse Program Manager, the HSE, the results of individual drug/alcohol tests are not released to anyone without the expressed, written authorization of the tested individual, except on request of the DOT or state agency officials as part of an accident investigation, for statistical evaluation (only without names), or for training records. Written records are stored in locked filing cabinets; such records are not made part of the individual personnel files. Unless an employee or owner-operator gives his/her written consent (or release is required by state/federal law), the employee's/owner-operator's counseling/ rehabilitation or drug/alcohol test records are not released to a subsequent employer unless the proper release is received per DOT regulations.

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Training

Training of the Drug and Alcohol Policy and Procedure includes a review of the information and the completion of the steps for the applicable section or sections of the Procedure. The training for Supervisors on the techniques for accurately observing and evaluating the behavior and condition of employees and owner-operators regarding the section on Reasonable Suspicion is done by an outside training organization. All related training is provided initially and annually. Training records are maintained on file at the KM Port Allen office.

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**SUPERVISOR'S REASONABLE SUSPICION/CAUSE
DOCUMENT FORM**

WORK LOCATION/AREA: _____

LOCATION OF INCIDENT: _____

EMPLOYEE/OWNER-OPERATOR NAME: _____

DATE OF OBSERVATION: _____ TIME: _____

OBSERVATIONS RECORDED BY: _____

ADDITIONAL WITNESSES: _____

LENGTH OF TIME OBSERVED: _____

DESCRIPTION OF BEHAVIOR/INCIDENT: _____

DID EMPLOYEE/OWNER-OPERATOR REFUSE A FITNESS-FOR-DUTY EXAMINATION? _____

DID THE EMPLOYEE/OWNER-OPERATOR LEAVE THE WORKPLACE ON HIS/HER OWN? _____

CIRCUMSTANCES OF EMPLOYEE'S/OWNER-OPERATOR'S DEPARTURE _____

TIME LEFT: _____ LOCATION: _____

VEHICLE (IF ANY): _____

WERE LAW ENFORCEMENT AUTHORITIES CALLED? _____ TIME: _____

NAME OF AUTHORITIES NOTIFIED: _____

OTHER PERSON(S) OBSERVING DEPARTURE _____

ADDITIONAL COMMENTS/INFORMATION: _____

REPORT TURNED OVER TO: _____

REPORTING SUPERVISOR'S SIGNATURE

DATE

WITNESS' SIGNATURE

DATE

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Policy

It is the policy of Kent Materials to protect its employees and visitors from harm through safe evacuation if an emergency occurs in its offices and facilities.

Procedure

The evacuation routes are posted in strategic locations throughout Kent Materials offices and facilities. Each employee working here determines his/her primary and secondary evacuation routes if a drill or an actual emergency occurs, based on where they are when the alarm sounds. Employees follow the steps as described below.

Several Kent Materials employees are given “critical” duties to perform in the event of an emergency; those duties are listed below and employees are trained accordingly:

- **Operations Manager has the duty of checking all rooms to ensure everyone else evacuates, and closing all doors as they evacuate.**
- **Receptionist has the duty of keeping a log of employees and visitors in the facilities and using the log to take a “head count” at the muster location.**
- **Operations Manager has the duty of calling the emergency response organization (911) and reporting the emergency.**

When an emergency occurs at the Kent Materials offices and facilities, employees effectively and safely accomplish the following:

1. If you detect emergency, determine nature of emergency (fire, explosion, bomb or chemical threat, domestic disturbance, etc.) and **where it is occurring** (office, hallway, storage area, etc.) by observing situation.

NOTE: EVACUATION IS REQUIRED WHEN A FIRE OR EXPLOSION OCCURS OR A BOMB OR CHEMICAL THREAT IS PRESENT ANYWHERE IN THE BUILDING

2. If you detect emergency, verbally yell nature and details of emergency. Include in verbal announcement type of emergency, instructions, and other pertinent items, to help fellow employees and visitors understand what is happening, to allow them to protect themselves, and to safely evacuate. For example, yell, **“FIRE! FIRE in the front storage area; get out now”!**

3. If fire, extinguish fire according to *Fire Extinguisher/Fire Safety Policy and Procedure*.

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4. **All Employees:** Upon hearing verbal alarm,
- Collect your thoughts and think first of your **primary** evacuation route; if conditions or circumstances indicate your primary evacuation route is blocked, collect your thoughts quickly again and select your secondary evacuation route.
 - Evacuate building by traveling your evacuation route; assist others along way, if necessary, but always protect yourself **first**.
 - If not inside, go to muster location; do not go back into building.

Note: Vendors, clients and field employees are considered visitors. Office employees are responsible for escorting their visitors from the building. If a visitor needs assistance, office employees provide that assistance, as necessary.

5. For employee(s) having “critical” duty to report emergency to response organization, **use cell phone** if possible (911 for Fire Department, Police Department, HAZMAT Unit):

- Give your name, Kent Materials Name location/address, and a brief but complete description of emergency.
- Remain on telephone until response organization representative releases you; they may need to clarify information or ask questions.

5. For employee(s) having “critical” duty to check buildings for occupants while they are evacuating, look into offices and other areas and call out, then close each door as you evacuate to indicate office or area is empty. If one evacuation route is blocked, designated person will communicate to others to check areas for occupants while evacuating or find some other method to determine if anyone is in blocked-off areas, if possible.

6. **All Employees:** After you evacuate, report to designated “head count/muster” area in front of main building across parking lot; muster area is not labeled.

7. Check in with “head count” person to be identified and to receive instructions or information; assist as needed until emergency is ended.

Employees working in our offices and facilities must take the time to periodically review this procedure and the escape routes to ensure a quick, effective and safe evacuation if an emergency occurs. Do not attempt to re-enter buildings during an emergency; let the professional response personnel handle any rescues. However, Kent Materials employees make themselves available to assist response organizations as needed. Contact the Operations Manager for more information about the plan or your duties under the plan. This written plan is kept in the office and is available for employee review.

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Drills

In order to keep awareness levels elevated for the health and safety of our employees and visitors, emergency drills are performed at least annually. Drills resemble as closely as practicable a real emergency and include the following steps:

1. Operations Manager selects and stations employees and/or outside personnel to observe and document emergency action/drill process.
2. Operations Manager creates a drill scenario that contains following and presents to **any employee** to initiate drill:

- How to communicate drill _____
- Type of emergency _____
- Location of emergency _____
- Other applicable information _____

3. Employee receiving drill scenario verbally announces emergency based on scenario, preceded by words: **THIS IS A DRILL.**

4. ALL employees demonstrate and/or simulate performance of duties and responsibilities (including “critical” duties) according to Plan:

- Collect your thoughts; repeat **THIS IS A DRILL** when communicating emergency information to others.
- Evacuate building using **primary** escape routes and assist others while doing so; **secondary** escape routes should only be used if emergency scenario prevents use of primary routes.
- Employees (and visitors) report to muster area for “head count”; designated employee verifies head count.

5. Designated “critical” employee(s)

a. report emergency: simulate dialing 911 and provide appropriate mock information (see *Procedure* section).

B. checks all rooms and closes all doors during evacuation.

6. When all accounted for, Operations Manager ends drill and conducts critique of observed drill performance compared to this *Policy and Procedure*, to determine effectiveness and safety of process.

7. Operations Manager records all observations made and results of critique session on Safety Meeting form and places in appropriate HSE files.

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Training

Training is accomplished by reviewing the contents of this Policy and Procedure with office employees, when first hired, when the Plan changes, and annually thereafter. Verification of understanding of the information contained in this Policy and Procedure is accomplished by successfully passing a written test and by demonstrating the proper procedure (for office personnel) to evacuate the offices and/or complete “critical” duties during an emergency drill (see *Performance-Based Training* section). Training is recorded on a *Training Documentation* form (see *Training P/an*); the *Training Report* is updated to reflect the training received.

Recordkeeping

- *Training Documentation* forms are placed in appropriate RSE files and maintained for two (2) years, then discarded.
- Performance-Based Training written tests completed during the training session are attached to *Training Documentation* forms, placed in appropriate HSE files and maintained for two (2) years, then discarded.
- *Safety Meeting* minutes reflecting results of Emergency Drill are placed in appropriate HSE files and maintained for two (2) years, then discarded.

Standard: 29 CFR 1910.38 Emergency action plans

(a) Application. An employer must have an emergency action plan whenever an OSHA standard in this part requires one. The requirements in this section apply to each such emergency action plan. (b) Written and oral emergency action plans. An emergency action plan must be in writing, kept in the workplace, and available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees. (c) Minimum elements of an emergency action plan. An emergency action plan must include at a minimum: (1) Procedures for reporting a fire or other emergency (2) Procedures for emergency evacuation, including type of evacuation and exit route assignments (3) Procedures to be followed by employees who remain to operate critical plant operations before you evacuate. (4) Procedures to account for all employees after evacuation (5) Procedures to be followed by employees performing rescue or medical duties (6) The name or job title of every employee who may be contracted by employees who need more information about the plan or explanation of their duties under the plan. (d) Employee alarm system. An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose and comply with the requirements in §1910.165. (e) Training: an employer must designate and train employees to assist in a safe and orderly evacuation of other employees. (f) Review of emergency action plan: An employer must review the emergency action plan with each employee covered by the plan: (1) When the plan is developed or the employee is assigned initially to a job; (2) When the employee’s responsibilities under the plan change; and (3) When the plan is changed.

[Web address is www.gpoaccess.gov/lectr in Browse, scroll down to and click “Title 29— Labor”; click “Go”; search and click 1900-1910(1901.1-1910.999); search and click 1910.1 to 1910.901-1910.999; search and click “1910.38 Emergency action plans”.]

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Materials is required by 29 CFR 1910.38 to develop, in writing, and implement an Employee Evacuation Plan and a Fire Prevention Plan for its employees. These Plans cover those designated actions employees must take to ensure safety from fire and other emergencies. Examples of other emergencies as defined in the appendix of the abovementioned regulation are *toxic chemical releases, workplace violence, etc.* Kent Materials (KM) Plans include the following elements:

Employee Evacuation Plan

- *Emergency escape procedures and emergency escape route assignments.*
- *Procedures to account for all employees after emergency evacuation have been completed.*
- *Rescue and medical duties for those employees who are to perform them.*
- *The preferred means of reporting fires and other emergencies.*
- *Names or regular job titles of persons who can be contacted for further information or explanation of duties under the plan.*
- *Establish an employee alarm system which complies with Sec. 1910. 165*
- *Establish types of evacuation to be used in emergency circumstances.*
- *Designate and train a sufficient number of persons to assist in the safe and orderly emergency evacuation of employees.*

Fire Prevention Plan

- *A list of the major workplace fire hazards and their proper handling and storage procedures, potential ignition sources and their control procedures, and the type of fire protection equipment or systems, which can control a fire involving them.*
- *Names or regular job titles of those personnel responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires.*
- *Names or regular job titles of those personnel responsible for control of fuel source hazards.*
- *Control accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire emergency.*
- *Employer shall review with each employee upon initial assignment those parts of the fire prevention plan which the employee must know to protect the employee in the event of an emergency.*
- *Employer shall regularly and properly maintain, according to established procedures, equipment and systems installed on heat producing equipment to prevent accidental ignition of combustible materials.*

The web address for a current copy of the standard is www.osha.gov Search “1910.38”; double click “1910.38 Emergency action plans

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In most instances, the elements of the individual Plans are combined because of the similarities in the procedures. These Plans are given to existing employees prior to the implementation date; it is given to new employees at employment. Training is provided to ensure understanding by and safety for all employees. Refresher and re-training are conducted as needed to ensure safety of personnel. These Plans are reviewed annually or when changes occur which affect the Plans or sections of the Plans. Adjustments to the Plans are made to reflect current conditions and situations within KM organization and structure.

These Plans are also general knowledge for the Employee Evacuation and Fire Prevention procedures at all customer/client locations, but are not to supersede the customer/client's Emergency Action and Fire Prevention Plans or Emergency Preparedness Program.

DUTIES AND RESPONSIBILITIES OF KEY PERSONNEL

In every emergency, key personnel must step forward and perform their tasks effectively, efficiently and (most importantly) safely to put the response or evacuation process in motion, regardless of the type of emergency that occurs. Time is very important in the process for ensuring employee safety. If key personnel respond quickly (and correctly), lives are saved and injuries and damage are reduced. The same level of importance is given to preparing all other employees to respond favorably in an emergency. Key personnel ensure that every employee is provided with every opportunity to learn how to protect themselves and others, and to ensure that the equipment and systems are in place to enable these employees to protect themselves and others.

The list below includes key Company employees who perform these critical duties / responsibilities:

- HSE Manager has a duty to maintain a current list of hazards (fire and other emergencies); a list of potential ignition sources and their control procedures; and a list of fire protection equipment or systems that can control a fire. This list of equipment includes portable extinguishers used in Company vehicles.
- HSE Manager is responsible for the training of employees in emergency action procedures and fire prevention techniques, and rescue and First Aid/CPR, including initial, refresher and re-training requirements.
- HSE Manager is responsible for the maintenance of the equipment and systems associated with fire prevention and control.
- Every employee is responsible for notifying other employees and visitors (owner/operators) of the emergency and properly notifying the appropriate emergency response organization if an emergency occurs.

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NOTE: The KM Office has an audible smoke and heat alarm system. Customer / client locations probably have alarms that sound when a drill / emergency occurs.

- The designated “Head Counters” have the duty and responsibility to set up the procedure to account for personnel after emergency evacuation and to conduct that head count if an emergency actually occurs. Head Counters also coordinate the necessary medical attention required by employees. These individuals are the designated “Head Counters”:

- Brad Antie: office in Port Allen
 - Derrick Leblanc: yard / shop in Port Allen
 - Operations Manager / all other KM locations
 - HSE Manager is responsible for the development of the Employee Evacuation and Fire Prevention Plans, and the periodic review/audit and edit of these Plans as required.
- The assignment of these duties and responsibilities lies with management; the persons selected have the interest, motivation and especially the time to devote to these key aspects of the Employee Evacuation and Fire Prevention Plans.

ESCAPE ROUTE ASSIGNMENTS (Types of Evacuation)

Kent Materials elects to structure its emergency response and fire prevention activities using only one evacuation type: an evacuation “from a building” at its main office building and from its shop/yard buildings in Port Allen.

Evacuation From a Building

Kent Materials has an evacuation floor plan for its offices and has posted copies of the floor plan in strategic locations throughout. This floor plan identifies where you are in reference to all exits on the level (floor), with arrows that direct you to the nearest exit, and to other exits on that level (floor). Each employee working in that office must review that floor plan and determine what are his/her primary and secondary escape routes if a drill or an actual emergency occurs.

The “primary” escape route is the shortest distance from an employee’s work location to a manual door exit. The “secondary” escape route is the alternate exit in the event the primary route is blocked. A copy of the Kent Materials floor plans are found at the end of these Plans.

CAUTION: If conditions indicate your primary escape route is blocked, collect your thoughts quickly and select the secondary escape route.

Kent Materials elects to treat owner-operators that infrequently visit its offices and shops / yards as visitors. A KM office employee escorts all visitors from the building in the event of a drill or an emergency.

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NOTE: Owner-operators that infrequently visit the office are regarded as visitors. KM office employees are responsible that their visitors are escorted from the building.

HAZARDS

Hazards in the work place are identified and communicated to all employees, not only as part of the Hazard Communication: Right-to-Know program, but as part of the Emergency Evacuation and Fire Prevention Plans. If hazards are known, and the impact these hazards have to various operational activities are known, employees tend to feel safer. These hazards are identified and personnel are trained to prevent incidents from occurring.

The hazards at Kent Materials locations / facilities are identified in the table on the next page, along with any special handling or storage procedures, nearby potential ignition sources, hazard controls, and types of fire protection equipment or systems which can control a fire involving the hazardous material.

NOTE: Hazards may not be flammable; columns concerning ignition sources and fire extinguishments may not apply.

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HAZARDS IN THE WORK PLACE

	Hazard #1	Hazard #2	Hazard #3	Hazard #4	Hazard #5
Hazard (describe; identify location)	Fire or electric, heated water: in hot water heater above ceiling in warehouse.	Fire, hot liquids and food: from appliances in kitchen area (coffee maker, microwave, range, toaster).	Fire, heat element: in copy machine back office	Fire, gas burner: on gas range and oven in kitchen area.	Fire, vent less gas fireplace: in great room.
Special Handling or Storage Procedure	None for fire. Storage adequate.	None for fire. Use special care in the handling of coffee, food. Storage adequate	None for fire. Storage adequate.	None for fire. Storage adequate.	None for fire. Ensure gas valves are securely closed when not in use, and caution when lighting.
Potential Ignition Source (location)	Electrical sparks from connections,	Electrical sparks from connections,	Electrical sparks from connections	Gas line connections	Gas line connections
Control Procedures	Inspect annually for deterioration,	Inspect annually for deterioration,	Inspect annually for deterioration,	Inspect annually for deterioration,	Inspect annually for deterioration.
Types of Fire Equipment or Systems	ABC extinguisher (20#) available in warehouse,	C02 extinguisher (30#) available in kitchen area,	C02 extinguisher (#30) available in kitchen.	C02 extinguisher (#30) available in kitchen area.	ABC extinguisher (#20) available in warehouse.
Comments: HSE Manager has a list of portable extinguishers issued to Company vehicles.					

Note: Use additional pages if more hazards are found in the work place

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EMERGENCY REPORTING

Any employee may detect an emergency or a condition or situation that may result in an emergency at any time on any day, since emergencies do not usually announce themselves before they occur. If an employee detects an emergency, he/she must report that emergency quickly and correctly so the appropriate emergency response organization (fire department, HAZMAT unit, ambulance, etc.) can respond quickly to minimize the consequences of the emergency.

In addition, Kent Materials employees report emergencies to management immediately after the emergency is reported to the response organization (or as soon as possible).

Determine what the emergency is and obtain as much detail as possible regarding the emergency: what emergency has occurred; when did it happen; is evacuation needed; has anyone been injured; what is occurring at the present time; etc. Call the appropriate response organization:

Ambulance 911 Poison Control 1-800-256-9822
 Fire 911 or 225-389-4357 NRC (Spills) 1-877-925-6595
 Police/Sheriff 911 or 225-389-3831 or 225-389-5000
 OLOL Regional Medical Center 225-756-8826 Other _____

NOTE: These telephone numbers are placed on several walls within view of telephones throughout the building.

Give the person who answers your name, your location/address, and a brief but complete **description of the emergency**. Then remain on the telephone line to clarify information or answer additional questions until the person who answered releases you.

Our main office address is, 1555 Beaulieu lane, Port Allen, LA

Once you hang up with the emergency response organization; you are free to call management.

<u>Name</u>	<u>Mobil #</u>
Steve Kent	225- 937-0434
Gerard Smith	225- 278-6984
Brad Antie	225-235-0711

Once the emergency is reported, the employee continues at whatever stage of the emergency action he/she is in: fighting the fire, performing First Aid/CPR, handling critical duties, etc.

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TRAINING

Kent Materials employees are trained on the contents of our Employee Evacuation and Fire Prevention Plans prior to implementation; new employees are trained in the Plans at the time of employment. The training associated with and referenced by the regulation is conducted in conjunction with these Plans, and includes:

- A review of the Plans with each employee; initially, when Plans are developed, when employee duties or responsibilities change, and when the Plans change.
- A review of the parts of the Plans that affect safety of the employees.
- An appraisal of the hazards to which they are exposed.
- Training associated and referenced by this regulation.

PEOPLE ACCOUNTABILITY

The designated “head count” area serves an extremely important purpose in the emergency action scheme and process; it is a meeting place to enable the person-in-charge to determine who is safe and who is unaccounted for. This is especially true of Kent Materials employees; employees are continually entering and leaving the offices during the course of their work. Employees arriving at the “head count” location check-in before **leaving or assisting others**. A current employee roster is used to assist in accounting for employees.

When the response organization authorities arrive at the emergency scene, they can determine very quickly who is accounted for and who is not. If anyone is unaccounted for, steps are taken to search and, if necessary, rescue or attempt to rescue the missing person(s). All persons assist in determining where an individual might be, or where he/she was last seen, to improve the chances of finding any victims quickly.

RESCUE AND MEDICAL ATTENTION (First Aid/CPR)

Any attempts to rescue victims in an emergency before **the response organization arrives** are done if and only if the rescuers ensure protection for themselves and others during the rescue effort. Prior to any rescue attempt, a meeting is held, however brief, to analyze the situation and make the decision to rescue or not to rescue, considering first the safety of the rescuers. In most instances, the response organization handles the rescue of any victims; they are better trained and better equipped to undertake such a task. If necessary, First Aid and/or CPR are administered to any victims of the emergency, including anyone who was rescued. First aid is given until a medical service organization arrives (paramedics, first responders, doctors). However, assistance is offered by all employees until the emergency conditions are brought under control.

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CONCLUSION

After the emergency is over, and the victims are given the necessary medical attention, the task of cleaning up the site and investigating the accident/incident begin. Learning happens in the face of disaster. If necessary, improvements to the Plans and additional training of personnel are performed to eliminate or minimize future accidents/incidents. If necessary, procedures are changed to increase employee safety in the next emergency.

DRILLS

Smoke and heat detectors at the main office will sound with an audible alarm, and verbal alarms are given for all emergencies. This alerts employees (and visitors) to the emergency and enables all personnel to take the necessary steps to protect themselves while evacuating and assisting others.

Drills are conducted at least annually, and resemble as closely as practicable a real emergency evacuation, including a verbal alarm, a simulated reporting of the emergency, the proper evacuation of personnel (including visitors), and a head count at the rally location. Observers evaluate the drills to determine whether or not refresher training or re-training is required. A report is completed for each drill and placed in the proper administrative file for future action.

The Exposure Control Plan provides information to Kent Materials (KM) employees for the prevention of exposure to communicable diseases, such as the diseases caused by Hepatitis B virus (HBV) or Human Immunodeficiency Virus (HTV). If exposures to communicable diseases occur while on the job, procedures are provided as a follow-up to the exposure (refer to Policy and Procedure section). The Kent Materials Plan includes the following elements, as presented in 29 CFR 1910.1030:

- *Exposure Determination.*
- *Schedule and method of implementation for Methods of Compliance, Hepatitis B Vaccination and Post-Exposure Evaluation and Follow-up, Communication of Hazards to Employees, and Recordkeeping.*
- *Procedure for the evaluation of circumstance surrounding exposure incidents.*

[The web address for a current copy of the standard is www.osha.gov search “1910.1030”; click “1910.1030 –Blood borne Pathogens “.]

Exposures

This Plan covers **all KM employees** that have the potential to come into contact with injured persons. Tasks that fall under the scope of this Plan include providing First Aid and/or CPR care or assisting persons providing First Aid and/or CPR care that expose our employees to blood or bodily fluids or potentially infectious material.

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Hepatitis B Vaccinations

All KM employees are offered the opportunity to receive the battery of Hepatitis B vaccinations: the first Hepatitis B vaccination; the second vaccination 30 days after the first; and the third and last vaccination five months after the second vaccination (the entire process takes six months). If employees already received these vaccinations, the series is not administered. If employees decline the HBV vaccinations, it does not exclude the employee from receiving the vaccinations at a later date.

Training and Documentation

All employees receive information/training on Blood borne Pathogens at the time of employment, and refresher training thereafter. The training includes preventive controls and procedures for avoiding contact with bloodborne pathogens, a review of this Control Plan, a review of the regulations (29 CFR 1910.1030), and a review of the Blood borne Pathogens Policy and Procedure. The Exposure Control Plan is kept at the office in Port Allen, LA, and employees access it by calling the office and requesting to see a copy of the Plan.

Documentation of this training includes the date of the training, a summary of the training (where, when, how conducted), the names and qualifications of the instructors, and the names and job titles of those attending the training.

Equipment and Methods of Compliance

Employees learn as much as they can about HIV/HBV and First Aid/CPR, and learn to treat every patient as if he/she carries the AIDS (HIV) Virus or Hepatitis B (HBV) Virus. All human blood and other potentially infectious materials are treated as if known to be infectious for HIV or HBV.

Employees must avoid contact with blood and body fluids and materials containing blood whenever possible, and the use of personal protective equipment (PPE) can help. Employees verify that all barrier masks and latex gloves are provided with their First Aid Kits and are maintained in good condition, and employees utilize barrier masks and gloves for protection against direct contact during First Aid/CPR and other activities. Employees wear latex gloves, especially when handling body fluids, and wash their hands to decontaminate them with soap and water or disinfectant when finished administering First Aid/CPR or making contact with the injured person.

Initial cleanup of blood or other potentially infectious materials is followed by applying a 10% bleach solution, or other chemical germicide, on the contaminated surfaces. Care is taken in the collection and disposal of cleanup wastes and contaminated clothing from a medical emergency incident that involved blood or other potentially infectious materials. The closest clinic or

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hospital is contacted for disposing of any medical wastes is Baton Rouge General Medical Clinic, located in Baton Rouge, LA.

Post-Exposure Evaluation

All KM employees involved in First Aid/CPR incidents, where the potential exposure to blood or other potentially infectious materials occurs, report the incident to the office immediately after the incident occurs. The office contacts the HSE Manager with the appropriate information.

Incident Assessment by KM

During the HSE Manager's initial assessment of the incident, a determination is made concerning potential exposure to bloodborne pathogens. The HSE Manager contacts the KM doctor to make this determination. The following situations are exposures that are considered significant risks for communicable disease transmission: injuries such as needle sticks, cuts or puncture wounds with objects that are contaminated by blood; contamination of open wounds or mucous membranes by blood or body fluids such as blood splashed in the eye or direct contact with blood during mouth-to-mouth resuscitation without a barrier mask; and extensive and/or prolonged contamination of intact skin with blood.

Based on information developed during the management of the incident, a preliminary determination is made: there was "***no exposure***," there was a "***potential exposure***," or there was an "***exposure incident***." This determination and the basis for it is explained to the employee, and documented by the HSE Manager.

Assessment Follow-Up by KM

If it is determined that there is ***no exposure***, the HSE Manager documents the information related to the incident on the Incident Report, and somewhere on this documentation writes the words "***no exposure***".

If the preliminary assessment of the incident indicates a ***potential exposure*** or an ***exposure incident*** has occurred, the exposed employee is offered the Hepatitis B vaccination series, as a post-exposure preventative, within 24 hours of the incident, unless the employee has previously received the complete Hepatitis B vaccination series. If anti-body testing reveals that the employee is immune or if the vaccination is not advised for medical reasons, the employee is not given the Hepatitis B series. Before the vaccinations are given, the employee completes a ***Consent/Declination Form***, according to the choice made. The Hepatitis B vaccination program is administered by a licensed, registered nurse or a licensed doctor who is knowledgeable of the

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Blood borne Pathogens standard. The Hepatitis B vaccinations are administered at Company Doctor Office.

If it is determined that an ***exposure incident*** has occurred, then a confidential medical evaluation and follow-up of the incident is made by a registered nurse or physician using the ***Initial Report of Human Body Fluid Exposure/Injury*** form. The completed form is made available to the exposed employee. Medical counseling is made available to any employee who has been exposed. Requests for clinical evaluation and testing are referred to the KM company doctor.

Record Keeping

Incident assessments are documented and filed at the Port Allen office. Specific medical files are established for employees who have experienced an exposure incident while on duty. These files are confidential files and are maintained with the employee's permanent medical file in Port Allen. The file contains medical evaluation forms, Consent/Declination Forms, the Initial Report of Human Body Fluid Exposure/Injury form, and Hepatitis B vaccination records.

HEPATITIS B VACCINATION CONSENT/DECLINATION FORM

The statement of consent or declination of Hepatitis B vaccination must be signed by an employee who chooses **to accept the vaccine (consent)** or **chooses not to accept the vaccine (declination)**. The statement can only be signed by the employee following appropriated training regarding Hepatitis B, Hepatitis B vaccination, the efficacy, safety, method of administration, and benefits of the vaccination, and an understanding that the vaccine and vaccination are provided free of charge to the employee. The statement is not a waiver if the declination is selected; the employee can request and receive the Hepatitis B vaccination at a later date if he/she remains at risk for Hepatitis B.

CONSENT STATEMENT

I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring Hepatitis B Virus (HBV) infection. I am given the opportunity to be vaccinated with the Hepatitis B vaccine, at no charge to myself. **I consent to take the Hepatitis B vaccination at this time.**

Employee Signature

Witness Signature

Date

Employee Name (Print)

Witness Name (Print)

Date

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DECLINATION STATEMENT

I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring Hepatitis B Virus (HBV) infection. I am given the opportunity to be vaccinated with the Hepatitis B vaccine, at no charge to myself however; I decline to take the Hepatitis B vaccination at this time. I understand that by declining this vaccine I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can request and receive the vaccination series at no charge to myself.

Employee Signature

Witness Signature

Date

Employee Name (Print)

Witness Name (Print)

Date

The Hazard Communication Standard is based on a simple concept: employees have both a need and a right to know the hazards and identities of the chemicals they are or could be exposed to when working. They also need to know what protective measures are available to prevent adverse effects *from* occurring. The Hazard Communication Standard (29 CFR 1910.1200) is designed to provide employees with the information they need. [The web address for a current copy of the standard is www.osha.gov search "1910.1200"; click "1910.1200 Hazard communications".]

Knowledge acquired under the Hazard Communication Standard helps employers provide safer workplaces for their employees. When employers have information about the chemicals being used, they can take steps to reduce exposures, substitute less hazardous materials, and establish proper work practices. These efforts help prevent the occurrence of work-related illnesses and injuries caused by chemicals.

Purpose and Application

Kent Material's (KM) written Hazard Communication program ensures compliance with the Standard. Additionally, it provides employees with information about the chemical substances that they may encounter in their workplaces, and the protective measures provided for working safely with those substances. This Program applies to all employees and owner- operators working for Kent Materials.

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Hazard Determination

Kent Materials personnel rely on the evaluation performed by the vendor, chemical manufacturer and/or importer on their hazardous chemicals, but review the following annually to determine if the hazardous chemicals are carcinogens.

- National Toxicology Program (NTP), “Annual Report on Carcinogens” (latest edition)
- International Agency for Research on Cancer (IARC) “Monographs” (latest editions)
- 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration
- American Conference of Governmental Industrial Hygienists (ACGIH) (latest edition) “Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment”
- National Institute for Occupational Safety and Health (NIOSH) “Registry of Toxic Effects of Chemical Substances”

Written Program

Kent Materials develops, implements and maintains a written Hazard Communication program, at its offices at 2688 Main Street and at its yards in Port Allen, which includes procedures requiring that:

- containers of hazardous chemicals at its facilities are labeled, tagged or marked with the identities of the hazardous chemicals, the appropriate hazard warnings, and the names and addresses of the vendors through regular semi-annual inspections,
- hazardous chemicals used in the workplaces have MSDSs in the appropriate binders or files in the work areas, or are easily accessible to employees in their field work locations,
- employees have effective information and training on hazardous chemicals in their work areas within 30 days of their initial job assignments, and whenever new physical or health hazards are introduced into their work areas (through training),
- inventory lists of the hazardous chemicals (known to be present) maintained using the identity referenced on the appropriate MSDSs; the lists are compiled for individual work areas and/or job sites and are kept with the corresponding MSDSs in the binders or files,
- employees have effective information and training associated with the hazards of non-routine tasks, when applicable.

If employees are working at multiple work sites, their immediate supervisors must ensure that their employees have the proper and complete information regarding hazardous chemicals hauled to and from the work sites; this is done by conducting regular training sessions.

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KM employees communicate to contractors and contract personnel the following information during safety meetings and training sessions to ensure that they are familiar with the contents of the KM written Hazard Communication program:

- Locations of the MSDSs and the physical and health hazards of each of the hazardous chemicals found in the workplaces.
- Precautionary measures that need to be taken by contract personnel to protect themselves during normal operating conditions and in foreseeable emergencies.
- The labeling system used by KM to ensure that the contract employees are familiar with and understand the information on the labels for each of the hazardous chemicals found in the workplaces.

If contractors and their employees are working at multiple locations and/or in more than one operation within KM, the affected immediate Supervisors are responsible for ensuring that the appropriate training sessions are conducted so that all contract employees have the proper and complete information regarding hazardous chemicals at the different work sites.

The KM positions with full responsibility and authority to ensure that the information presented above is implemented and executed as identified includes the following:

- Operations Manager position
- Bookkeeper position

Copies of the written Hazard Communication programs, MSDS binders, and inventory lists are kept at the following locations:

- KM office at 1555 Beaulieu Lane in Port Allen, LA

Labels and Other Forms of Warning

KM personnel make every attempt to ensure that all containers of hazardous chemicals arriving at the workplace are labeled, tagged or marked with the identities of the hazardous chemicals, the appropriate hazard warning or words, pictures, symbols or combinations which provide general information and information regarding the physical and health hazards of the hazardous chemicals, and the names and addresses of the chemical vendors. The labels are usually on the containers received, along with the MSDSs. If hazardous chemicals involve substance-specific health standards, KM personnel ensure that labels and other forms of warnings are used in accordance with those standards. If the labels are missing, KM personnel contact the vendors and have them send the labels as soon as possible, and use signs, placards, process sheets, batch tickets, operating procedures or some other written material in lieu of labels until the replacement labels arrive. When this occurs, KM personnel explain the information on the other forms of warnings and make them readily accessible to all affected employees.

KM personnel do not label portable containers into which hazardous chemicals are transferred and intended only for immediate use by the specific individual; KM requires labeling for all other portable container usages. KM personnel do not remove or deface existing labels on

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incoming containers of hazardous chemicals unless the containers are immediately marked with other alternative information. KM personnel ensure that the labels and other forms of warnings are legible, in English and prominently displayed on the container, and are readily available to all personnel at all times. KM does not have any non-English speaking personnel and does not use labels in languages other than English.

Material Safety Data Sheets (MSDSs)

KM has MSDSs in its workplaces for all hazardous chemicals which it uses. The MSDSs are in English and contain the following, which are utilized by KM and owner-operators to locate specific information regarding hazardous chemicals, as indicated below:

- Identities used on the label.
- If single substances, the chemical and/or common names.
- If mixtures,
 - o chemical and common names of ingredients which contribute to known hazards, and common names of the mixtures themselves.
 - o chemical and common names of ingredients which are health hazards and which comprise 1%+ (0.1%+ for carcinogens) of composition.
 - o chemical and common names of ingredients which are health hazards that could be released from mixtures in concentrations in excess of OSHA PEL or ACGIH TLV, or could present health risks to employees.
 - o chemical and common names of ingredients which are physical hazards when present in mixtures.
- Physical and chemical characteristics of the hazardous chemicals: vapor pressures, flash points, etc.
- Physical hazards of the hazardous chemicals: potentials for fire, explosion, reactivity, etc.
- Health hazards of the hazardous chemicals: signs and symptoms of exposure and medical conditions, which are generally recognized as being aggravated by exposure of chemicals.
- Primary routes of entry: inhalation, ingestion, absorption.
- OSHA PEL, ACGIH TLV and any other exposure limit information used/recommended, where available.
- Whether listed in National Toxicology Program or found to be carcinogens.
- Any generally applicable precautions for safe handling and use which are known, including appropriate hygienic practices, protective measures during repair and maintenance of contaminated equipment, and procedures for clean-up of spills/leaks.
- Any generally applicable control measures, which are known such as, appropriate engineering controls, work practices or PPE.
- Emergency and first aid procedures.
- Dates of preparation of MSDSs or last changes.

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- Names, addresses and telephone numbers of persons or organizations that can provide additional information on the hazardous chemicals and emergency procedures.

MSDSs are usually received with the hazardous chemical packages and containers at the time of the shipments. If no MSDSs are provided, KM obtains MSDSs from the vendors as soon as possible or prints one from a chemical web site on the Internet. KM obtains MSDSs from its retail distributors selling the hazardous chemicals, or the names, addresses, and telephone numbers of the chemical manufacturers to obtain the MSDSs, or KM will locate one on the web and print it out.

KM maintains copies of the MSDSs for all hazardous chemicals in the workplaces and ensures they are readily accessible during the work shifts, and to the employees' designated representatives upon request. (Electronic access to maintaining paper copies of the MSDSs are permitted as long as there are no barriers to employees' immediate access.)

KM personnel may travel between workplaces during their shifts; the MSDSs are kept at their primary workplace facilities. KM ensures that its personnel can immediately obtain the required information in emergencies by contacting the dispatcher or their Supervisor; the dispatcher is able to relay MSDS information to KM employees via radio.

Information and Training

KM provides its personnel with effective information and training on its hazardous chemicals at their initial job assignment (during orientation and site-specific training within the first 30 days of employment) and immediately whenever a new physical or health hazard not previously trained is introduced into the employees' work areas. Information and training covers categories of hazards (flammable, carcinogenic, etc.) of specific chemicals; chemical-specific information is always available through labels and MSDSs. KM personnel are provided information on all operations where hazardous chemicals are present, and the locations and availability of the written Hazard Communication program, including the required lists (inventory) of hazardous chemicals and corresponding MSDSs. KM personnel are trained in the methods and observations to detect the presences or releases of hazardous chemicals, including all monitoring conducted by KM, any continuous monitoring devices, and visual appearances or odors of chemicals when they are released.

Personnel are also trained on the physical and health hazards of chemicals in work areas, the measures they can take to protect themselves from hazards, including specific procedures KM has implemented to protect them from exposures to these chemicals, such as appropriate work practices, emergency procedures, and PPE to be used. KM personnel are also exposed to the details of the written Hazard Communication program and the policy and procedure developed by KM, including an explanation of the labeling system, the MSDSs, and how personnel can obtain and use the appropriate hazard information.

The Table at the end of the Policy and Procedure is presented to identify the locations and operations where hazardous chemicals are present, the hazardous chemicals found at these locations, the methods

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and observations for detecting the presence or release of these chemicals, the physical and health hazards of the chemicals, and the protection methods to use to prevent exposure.

Information is documented onto Safety Meeting forms when the information is shared with personnel; the forms are turned in to the respective Supervisor. Training is recorded onto Training forms when the training is conducted; the Reports are turned in to the HSE Manager for documentation onto the Training Report and distributed quarterly to all employees. The HSE Manager monitors the Training Report and the Training Matrix to ensure that all of the affected personnel are provided the information and training required for the Hazard Communication Standard.

Definitions and Abbreviations

In order to properly understand Hazard Communication, you should understand several definitions, to ensure that the hazards of all chemicals are evaluated and that information concerning the hazards are transmitted correctly to the appropriate people. The following definitions and abbreviations assist you in understanding this Hazard Communication Standard.

Note: Definitions with an asterisk (*) are found in the Hazard Communication Standard.

Acute Effect

A health effect of short duration that usually occurs quickly and rapidly after a short-term exposure to a hazardous material.

Carcinogen *

My cancer-producing agent.

Chemical Name *

The scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry or the Chemical Abstracts Service.

Chronic Effect *

A health effect of long term duration which generally occurs as a result of long term exposure to a health hazard.

Corrosive*

A chemical that causes visible destruction of or irreversible alterations in, living tissue by chemical action at the site of contact.

Exposure

Subjection to a hazardous material in the course of employment through any route of entry (inhalation, ingestion, injection, skin contact or absorption), including potential exposure.

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Hazardous Material *

A chemical 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; includes carcinogens, toxins, reproductive hazards, sensitizers, and agents that damage the skin, blood, lungs, eyes, nervous system or mucous membranes.

Health Hazard

A chemical for which there is statistically significant evidence that it is a carcinogen, toxic or highly toxic agent, irritant, corrosive, sensitizer, neurotoxin, etc. which damage the lungs, skin, eyes, or mucous membranes.

Highly Toxic

A chemical falling within any of the following categories:

- median lethal dose (LD50) of 50 milligrams or less per kilogram of body weight.
- Median lethal dose (LD50) of 200 milligrams or less per kilogram of body weight.
- Median lethal concentration (LC50) in air of 200 parts per million by volume or less.

Irritant*

A chemical, which is not corrosive, but which causes a reversible inflammatory effect on living tissue by chemical action at the site of contact.

Material Safety Data Sheet (MSDS) *

Written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (a) of the OSHA standards 29 CFR 1910.

Mixture *

Any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

Mutagen

A chemical or physical agent that induces genetic mutations.

Permissible Exposure Limit

The legal limit of allowable exposure to a chemical on the basis of **an** 8-hour workday in a 40-hour week, as developed by OSHA.

Physical Hazard *

A chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, an explosive, a flammable, an organic peroxide, an oxidizer, a pyrophoric, an unstable (reactive), or a water-reactive.

Routes of Entry

The means by which hazardous chemicals can get into the body; specifically, the respiratory system, the digestive system and the skin.

Sensitizer *

A chemical that causes a substantial proportion of exposed people or animals to develop an allergic reaction in normal tissue after repeated exposure to the chemical.

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Target Organ Effects

The range and diversity of effects and hazards to the human body as described in 29 CFR 1910.1200, Appendix A Health Hazard Definitions, *Target Organ Effects*.

Threshold Limit Value

An exposure level under which most people can work for 8 hours a day, day after day, with no harmful effects, as determined by the American Conference of Governmental Industrial Hygienists.

Toxic

A chemical falling within any of the following categories:

- a) Median lethal dose (LD50) of more than 50 milligrams per kilogram of body weight.
- b) Median lethal dose (LD50) of more than 1,000 milligrams per kilogram of body weight.
- c) Median lethal concentration (LC50) in air of more than 200 parts per million by volume.

The following abbreviations will assist you in an understanding of these lessons. Read through them at least once to become familiar with them.

ACGIH	-	American Conference of Governmental Industrial Hygienists
CFR	-	Code of Federal Regulations
IARC	-	International Agency for Research of Cancer
IDLH	-	Immediately Dangerous to Life and Health
MSDS	-	Material Safety Data Sheet
NIOSH	-	National Institute for Occupational Safety and Health
NTP	-	National Toxicology Program
OSHA	-	Occupational Safety and Health Administration
PEL	-	Permissible Exposure Limit
PPE	-	Personal Protective Equipment
RTECS	-	Registry of Toxic Effects of Chemical Substances
SCRA	-	Self Contained Breathing Apparatus
SIC	-	Standard Industrial Code
TLV	-	Threshold Limit Value

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Chemical Inventory List

Mechanic Shop, Yard and Warehouse

Date: 07/08/03

Chemical Name	Manufacturer	Used By
Aero-Flow Motor Oil	Baton Rouge Industries	Mechanics
AK-47 Grease Buster	Reliant Technologies	Mechanics, Welder
Hi-Tech Antifreeze	Baton Rouge Industries	Mechanics
Hot Stuff	Balmar	Mechanics, Welder
Neutra ClA CW	Univar USA	Mechanics
Power Gear MP Gear Lube	Baton Rouge Industries	Mechanics
R-Pack 97 Packer Fluid Corrosion	Reliant Technologies	Mechanics
Super S ND	Smitty's Supply	Mechanics
Super S AW 68 Hydraulic Oil	Smitty's Supply	Mechanics
Super S R&O Hydraulic Oil	Smitty's Supply	Mechanics
Super S SuperSyn 80W-140 Full Synthetic Gear Oil	Smitty's Supply	Mechanics
Super S Tractor Hydraulic / Transmission Oil	Smitty's Supply	Mechanics
TGR Extra Heavy Duty Cleaner	Reliant Technologies	Mechanics, Welder

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The Kent Materials (KM) written Hearing Conservation program is designed to protect personnel against the potential adverse effects of work-related noise associated with hearing loss, and to advise personnel about the contribution of non-occupational noises to potential hearing loss. The Occupational Noise Exposure standard (29 CFR 1910.95) is designed to provide employees with the information they need. [The web address for a current copy of the standard is www.osha.gov search “1910.95”; click “1910.95 Occupational noise exposure”.]

Knowledge acquired under the Hearing Conservation standard helps employers provide safer workplaces for their employees. When employers have information about the noise being generated in the workplace, they can take steps to reduce or control the exposures, engineer out the noises, and/or establish proper work practices. These efforts help prevent the occurrence of work-related hearing losses caused by excessive noise.

Written Program

Kent Materials (KM) administers a continuing, effective hearing conservation program whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response), or equivalent available in the standard, and for exposures to impulsive or impact noises exceeding 140 decibels peak sound pressure levels. For purposes of the hearing conservation program, employee noise exposures are computed in accordance with Appendix A and Table G-16a, without regard to any attenuation provided by the use of personal protective equipment.

Monitoring

KM monitors its noise levels annually according to Appendix G, in its yards, and shops. KM currently does not have any exposures that exceed the 8-hour time-weighted average of 85 decibels; however, KM does maintain a noise monitoring program that consists of the following:

- Noise monitoring is done using a sound level meter: A-weighting, slow response settings.
- Noise monitoring is conducted in at least four locations around the noise generators at a minimum of two different distances at two different elevations.
- Data is compiled and analyzed regarding the noise information collected.
- Information is collected and documented regarding the personnel working in these areas during the course of a routine work day.
- Information resulting from noise monitoring is posted annually for employees to view.
- All information is filed in accordance with the requirements of the Hearing Conservation Program.
- The information is reviewed annually to determine if the need for a Hearing Conservation Program still exists.

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The equipment that generates these noises includes compressors, air ratchets, and other power tools and equipment. Non-occupational exposures include noise from yelling into someone's ear, personal power tools and equipment, engines and machines, musical instruments, and other noise generators around the home. All continuous, intermittent and impulsive sound levels from 80 decibels to 130 decibels are integrated into these noise measurements. The instruments used to measure employee noise exposures are calibrated annually to ensure measurement accuracy. Monitoring is repeated whenever a change in process, equipment, or controls increases or decreases the noise exposures to the extent that additional employees may be exposed at or above the action levels or the attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements of this section. In addition, the information collected during the monitoring process is used in the proper selection of hearing protectors.

Employee Notification

KM notifies each employee exposed at or above an 8-hour time-weighted average of 85 decibels of the results of the monitoring, and provides the affected employees or their representatives with an opportunity to observe any noise measurements conducted in accordance with this program. The notification is made annually to all employees during the training of the hearing conservation program.

Audiometric Testing Program and Test Requirements

The noise survey conducted in August, 2003 at the KM offices, shops and yards in Port Allen and Baton Rouge indicated that there are no noise exposures to employees in excess of an 8-hour time weighted average (TWA) of 85 decibels or more based on the job descriptions and work activities performed. Therefore, an "Audiometric Testing Program" is not required at this time. If the noise levels change (increase), the noise survey will determine if there is a need for an "Audiometric Testing Program".

Hearing Protectors

KM provides hearing protectors to all employees at the shop and yard locations, at no cost to the employees. Managers and supervisors are responsible to ensure that hearing protectors are worn by their employees at all times when working in noise areas. Employees are responsible to ensure they wear the protectors. KM provides training in the use and care of all hearing protectors provided to employees, including their initial fitting and the correct use of the protector.

Hearing Protection Attenuation

KM evaluates the noise surveys conducted annually and the hearing protector attenuation for the specific noise exposure environments in which a protector is used, and uses the evaluation method described in 1910.95 Appendix B (iii) for determining attenuation; hearing protectors purchased by KM attenuate employee exposure at least to an 8-hour TWA of 85 decibels.

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Attenuation is re-evaluated whenever noise increases to the extent that the hearing protectors provided may no longer provide adequate attenuation; when this occurs, KM will provide more effective hearing protectors.

Training Program

KM has established a training program for all employees who are exposed to some noise, and expects participation of its employees in the program. Training is conducted for each employee included in the hearing conservation program. Information contained in the training program is updated to be consistent with changes in the protective equipment and the work processes of the employees. KM informs each employee and owner-operators on the effects of noise on hearing; the purpose of hearing protectors; the advantages, disadvantages, and attenuation of various types of hearing protectors; and instructions on the selection, fitting, use and care of hearing protectors.

Access to Information and Training Materials

KM provides copies of this written Hearing Conservation program and copies of the Standard to affected employees and owner-operators and their representatives upon request. KM provides copies of any informational materials it receives pertaining to the Standard from the Assistant Secretary to affected employees and their representatives upon request. KM provides copies of all materials related to the KM training and education programs pertaining to this Standard to the Assistant Secretary and the Director upon request.

Recordkeeping

KM maintains an accurate record for two years of all employee exposure measurements regarding the “monitoring” of noise in the workplace. KM allows access to these records according to its *Access to Employee Exposure and Medical Records Program* (29 CFR 1910.1020), which is in compliance with the Standard.

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Purpose

The purpose of the Hearing Conservation Policy and Procedure is to ensure that Kent Materials employees are protected against the potential adverse effects of work-related noise associated with hearing loss.

Policy

It is the policy of Kent Materials that its employees know about the potential adverse effects of work-related noise, and that employees wear the proper hearing protection to prevent hearing loss. It is also the policy of Kent Materials to require all employees to wear hearing protection whenever working around noise generators.

Procedures

The procedures that follow describe the processes for effectively implementing the written Hearing Conversation program within Kent Materials. The HSE Manager is responsible for informing employees of annual noise monitoring, the audiometric testing program, and the effects and purpose, selection, fitting, use and care of proper hearing protection. The HSE Manager is also responsible for the training of employees, and the proper documentation of the various aspects of the hearing conservation program.

Noise Monitoring

OSHA 1910.95 and the associated Appendices (especially Appendix 0) identify the requirement to determine if noise exists in the workplace, the levels to which this noise exists in the area around the noise generators, and if people working and visiting the workplace are at risk of this exposure to the level of 85 decibels (dB) for an 8-hour time-weighted-average (TWA). The following procedure is presented to ensure that the proper information is collected annually to enable these determinations.

1. Complete the header information on the attached *Noise Survey Form*: write in the Company Name, Equipment/Machine Name (Noise Generator), Location, and Date.
2. Draw an overhead outline of the equipment or machine (noise generator) in the box on the Form; make the lines of the equipment or machine touch the sides of the box.
3. Adjust the Sound Level Meter to the following settings:
 - Range 90: this detects noise between 80 and 100. If the noise is below 80, “LO” appears and you must adjust the range downward until you obtain a reading. If the noise is above 100, the reading will flash and you must adjust the range upward until it quits flashing.

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- **Weighting A:** this enables the Meter to respond to frequencies between 500 and 10,000 Hz, which is our hearing range.
- **Response SLOW:** this determines the interval at which the Meter revises the sound level reading.

4. Using a tape measure, take readings in the walkways and other areas suitable for people to be in, all around the noise generator, every few feet, at two different distances (for example, 3 ft and 5 ft) and at two different elevations (5 ft and 5 ft 6 in; height of our ears), and record the distances and readings; see example below:

5'	<u>3ft</u> <u>85</u>	<u>5ft</u> <u>80</u>
5'6"	<u>87</u>	<u>82</u>

Obtain additional readings as necessary to best represent the exposure that exists at this noise generator; record these distances, elevations and readings.

5. Determine the exposure to employees by identifying the specific work performed and the number of minutes or hours each employee spends at or near the noise generator; document in the Comments section.
6. Make whatever comments are appropriate for the noise generator surveyed in the Comments section; this includes running time, automatic start-up information, etc.
7. Submit the data for calculation and analysis.

Note: Repeat the process for all noise generating equipment and machinery at the location.

A Noise Survey Report is generated annually identifying the noise generating equipment and machinery, the decibel readings, the required hearing protection, and how long employees are allowed to work at a particular location without wearing any hearing protection. If the results of the Report indicate employees no longer have noise exposures, the monitoring process is discontinued until a change in the noise level occurs. The Report is posted in the workplace and the results are reviewed during a safety meeting shortly after the survey (see most recent Noise Survey Report).

Audiometric Testing Program

The noise survey conducted in August, 2003, at the KM offices, shops, and yards in Port Allen indicated that there are no noise exposures to employees in excess of an 8-hour time weighted average (TWA) of 85 decibels or more based on the job descriptions and work activities performed. Therefore, an "Audiometric Testing Program? Is not required at this time. If the noise levels change (increase), the noise survey will determine if there is a need for an "Audiometric Testing Program". [The web address to obtain a current copy of the standard is www.osha.gov search "1910.95"; click "1910.95- Occupational noise exposure".]

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Noise and Hearing

The effects of noise on hearing and hearing loss are identified below, along with some interesting facts relating to noise and hearing protection.

- Occupational hearing loss results from two causes: acoustic trauma (a blow to the head) and excessive noise.
- Excessive noise not only causes a loss of hearing ability, but also increases mental and physical fatigue, anxiety, and irritability.
- Effects of hearing loss include your ability to listen selectively, your ability to understand conversational speech, a threat to safe working conditions, and a decrease in personal productivity.
- Discomfort usually occurs at sound levels of 120 dB; pain at 140 dB.
- Progressive hearing loss results after long-term exposures to 90 dB or more.
- Noise-induced hearing loss is usually permanent and is always preventable.
- Advantages of ear plugs: Comfort; small size; customized fit.
- Advantages of ear muffs: uniform noise reduction capabilities; fit not so critical; prevents physical injury to outer ear; ease of supervision.
- Disadvantages of ear plugs: hygiene problems; easily lost/forgotten; difficult to supervise.
- Disadvantages of ear muffs: large size and bulk; electrical shock due to metal parts; easily abused; localization of sound.

Note: Constant exposure to excessive noise does not “toughen” your ears; the ears “get deaf”.

Hearing Protection Attenuation

Kent Materials conducts and evaluates noise surveys annually to determine the hearing protection attenuation it requires for the specific noise exposures using the evaluation method described in *1910.95* Appendix B (iii), as shown below:

	<u>Example</u>
1. Obtain the employee's noise TWA	= 95 dB
2. Subtract 7 dB (constant) from the NRR (33) of the protector (33 — 7 = 26)	
3. Divide result by 2 to provide a 50% safety factor	= <u>-13</u>
4. Subtract result from noise TWA	= 82

Note: Estimated noise TWA attenuation must be less than 85, and it is (82).

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Selection, Fit, Use and Care

The results of the survey identify the need for one type of hearing protector for KM employees at the shop and yard locations: **ear plugs** with an attenuation of 33. The plugs protect against hearing loss through *air conduction*. The instructions for inserting the various ear plugs are found on the package, unless the ear plugs are custom-fitted; generally, the plug is twisted until it is compressed and narrow, placed into the ear point first, released and allowed to untwist and expand until it conforms to the interior shape of the ear. The ear plugs are constructed of foam and conform to each individual's ears to immediately decrease the sound pressure level.

1. Examine ear protectors before each use.
2. If there is noticeable damage, or if the material is hard or brittle, replace the protector.
3. If the ear protectors are used more than once, they are cleaned after every use (usually daily) using soap and water to remove the wax and/or dirt and bacteria; rinse thoroughly.
4. Allow the protector to dry completely before using again.

Note: Never attempt to repair ear protectors; always replace them.

Training

Training is conducted for each employee included in the hearing conservation program. Information contained in the training program is updated to be consistent with changes in the protective equipment and the work processes of the employees. KM ensures that each employee is informed of the following:

- Effects of noise on hearing (see *Noise and Hearing* section)
- Purpose of hearing protection (see *Noise and Hearing* section)
- Attenuation of hearing protectors (see *Hearing Protection Attenuation* section)
- Advantages and disadvantages (see *Noise and Hearing* section)
- Instructions on selection, fitting, use and care of hearing protectors (see *Selection, Fit, Use and Care* section)

HSE Manager presents the Policy and Procedure to the employees and discusses it with them until they understand all of its components, using the guidelines established in the *Training Policy and Procedure*.

Copies of the Written Hearing Conservation Program and this Hearing Conservation Policy and Procedure are located in the Steve Kent Office in Port Allen Louisiana, and are available upon request to affected employees and their representatives. Copies of any informational materials KM receives from the Assistant Secretary pertaining to the Standard are available to affected employees and their representatives upon request.

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Recordkeeping

Kent Materials maintains a record of all Noise Survey Reports and supporting data regarding the monitoring of noise in the workplace for a period of two years; the Reports are kept in the office in Port Allen Louisiana.

All of these records are accessible according to the KM *Access to Employee Exposure and Medical Records Program* (29 CFR 1910.J 020).

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Attachment
NOISE SURVEY FORM

Company _____ Location _____

Equipment/Machine (Noise Generator) _____ Date _____

Comments

Person(s) Conducting Survey _____

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Protection against the effects of noise exposure is provided by Kent Materials when the sound levels exceed those shown in Table 0-16 when measured on the A scale of a standard sound level meter at slow response. When noise levels are determined by octave band analysis, the equivalent A-weighted sound level is determined as follows:

Octave band sound pressure levels are converted to the equivalent A-weighted sound level by plotting them on this graph and noting the A-weighted sound level corresponding to the point of highest penetration into the sound level contours. This equivalent A-weighted sound level, which may differ from the actual A-weighted sound level of the noise, is used to determine exposure limits from Table 0-16.

Figure G-9



100

Table G-16 Permissible Noise Exposure

Duration (hrs.)	dBA
8	90
6	92
4	95
3	97
2	100
1-1/2	102
1	105
1/2	110
1/4 OR LESS	115

200 500 1000 2000 4000 8000

BAND CENTER FREQUENCY IN CICLES PER SECOND

When employees are subjected to noise exceeding those listed in Table 0—16, feasible administrative or engineering controls are utilized. If such controls fail to reduce sound levels within the levels of Table 0—16, personal protective equipment is provided and used to reduce sound levels within the levels of the table. If the variations in noise level involve maxima at intervals of I second or less, it is considered continuous.

Hearing Conservation Program

Kent Materials administers a continuing, effective hearing conservation program, since employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of fifty percent (50%). Employee noise exposures are computed in accordance with Appendix A and Table G-16a, without regard to any attenuation provided by the use of personal protective equipment. An 8-hour time-weighted average of 85 decibels or a dose of fifty percent is referred to as the “action level”.

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Monitoring

Information in the form of an initial noise survey has indicated that employee exposure equals or exceeds an 8-hour time-weighted average of 85 decibels; therefore, Kent Materials has developed and implemented a monitoring program. The sampling strategy identifies employees for inclusion in the hearing conservation program and enables the proper selection of hearing protectors.

All continuous, intermittent and impulsive sound levels from 80 decibels to 130 decibels are integrated into the noise measurements. Instruments used to measure employee noise exposure are calibrated annually to ensure measurement accuracy, whether by Kent Materials or vendor personnel.

Monitoring is repeated annually or whenever a change in process, machines, equipment or controls increases noise exposures to the extent that additional employees may be exposed at or above the action level, or the attenuation provided by hearing protectors being used by employees is rendered inadequate.

Employee Notification

Kent Materials notifies each employee exposed at or above an 8-hour time-weighted average of 85 decibels of the results of the monitoring at its first available meeting, within 30 days of the noise survey.

Observation of Monitoring

Kent Materials provides affected employees or their representatives with an opportunity to observe any noise measurements (surveys) conducted. The scheduling of the surveys is communicated to employees at least 30 days prior.

Audiometric Testing Program

Kent Materials establishes and maintains an audiometric testing program by making audiometric testing available to all employees whose exposures equal or exceed an 8-hour time-weighted average of 85 decibels. The program is provided at no cost to employees. Audiometric tests are performed by Health Testing Solutions, which has met the requirements to have a licensed or certified audiologist, otolaryngologist, or other physician on staff, or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation. Health Testing Solutions verifies that all audiograms obtained meet the requirements of Appendix C: Audiometric Measuring Instruments.

1. Within 6 months of an employee's first exposure at or above the action level, (company) establishes a valid baseline audiogram against which subsequent audiograms can be compared. If mobile test vans are used, Kent Materials

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Obtains a valid baseline audiogram within 1 year of an employee's first exposure at or above the action level.

2. Testing to establish the baseline audiogram is preceded by at least 14 hours without exposure to workplace noise or the use of hearing protectors as a substitute. Kent Materials notifies employees of the need to avoid high levels of non-occupational noise exposure during the 14-hour period immediately preceding the audiometric examination.

3. At least annually after obtaining the baseline audiogram, Kent Materials obtains a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels.

4. Each employee's annual audiogram is compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred. This comparison is done by Health Testing Solutions technician.

a. If the annual audiogram shows the employee has suffered a standard threshold shift, (company) may obtain a re-test within 30 days and consider the results of the re-test as the annual audiogram.

b. The audiologist, otolaryngologist or physician reviews problem audiograms and determines whether there is a need for further evaluation.

Kent Materials provides to the person performing this evaluation the following information:

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

5. If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift has occurred, the employee is informed of this fact in writing, within 21 days of the determination.

6. Unless a physician determines the standard threshold shift is not work related or aggravated by occupational noise exposure, Kent Materials ensures the following steps are taken when a standard threshold shift occurs:

- Employees not using hearing protectors are fitted with hearing protectors, trained in their use and care, and required to use them.
- Employees already using hearing protectors are re-fitted and re-trained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary.

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- Employees are referred for a clinical audiological evaluation or an otological examination, as appropriate and if necessary.
- Employees are informed of the need for an otological examination if a medical pathology of the ear that is unrelated to the use of hearing protectors is suspected.

7. If subsequent audiometric testing of an employee whose exposure to noise is less than an 8-hour TWA of 90 decibels indicates a standard threshold shift is not persistent, Kent Materials:

- informs the employee of the new audiometric interpretation and
- discontinues the required use of hearing protectors for that employee.

8. An annual audiogram may be substituted for the baseline audiogram when, in the judgment of the audiologist, otolaryngologist or physician who is evaluating the audiogram:

- The standard threshold shift revealed by the audiogram is persistent or
- the hearing threshold shown in the annual audiogram indicates significant improvement over the baseline audiogram.

9. As used in this section, a standard threshold shift is a change in hearing threshold relative to the baseline audiogram of an average of 10 dB or more at 2000, 3000, and 4000 Hz in either ear. In determining whether a standard threshold shift has occurred, allowance may be made for the contribution of aging (presbycusis) to the change in hearing level by correcting the annual audiogram according to the procedure described in Appendix F: Calculation and Application of Age Correction to Audiograms.

Audiometric Test Requirements

Audiometric tests shall be pure tone, air conduction, hearing threshold examinations with test frequencies including as a minimum 500, 1000, 2000, 3000, 4000, and 6000 Hz. Tests at each frequency are taken separately for each ear. Audiometric tests are conducted with audiometers (including microprocessor audiometers) that meet the specifications of, and are maintained and used in accordance with, American National Standard Specification for Audiometers, S3.6—1969, which is incorporated by reference as specified in §1910.6. Pulsed-tone and self-recording audiometers, if used, shall meet the requirements specified in appendix C: Audiometric Measuring Instruments. Audiometric examinations are administered in a room meeting the requirements listed in Appendix D: Audiometric Test Rooms.

The functional operation of the audiometer shall be checked before each day's use by testing a person with known, stable hearing thresholds, and by listening to the audiometer's output to make sure the output is free from distorted or unwanted sounds. Deviations of 10 decibels or greater require an acoustic calibration. Audiometer calibration is checked acoustically at least annually in accordance with appendix E:

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Acoustic Calibration of Audiometers. Test frequencies below 500 Hz and above 6000 Hz may be omitted from this check. Deviations of 15 decibels or greater require an exhaustive calibration. An exhaustive calibration is performed at least every two years in accordance with sections 4.1.2; 4.1.3.; 4.1.4.3; 4.2; 4.4.1; 4.4.2; 4.4.3; and 4.5 of the American National Standard Specification for Audiometers, S3.6—1969. Test frequencies below 500 Hz and above 6000 Hz may be omitted from this calibration.

Hearing Protectors

Kent Materials makes hearing protectors available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to the employees.

Hearing protectors are replaced as necessary. Kent Materials ensures the hearing protectors are worn:

- By any employee who is required to wear personal protective equipment.
- By any employee who is exposed to an 8-hour time-weighted average of 85 decibels or greater.
- By any employee who has not yet had a baseline audiogram established pursuant to paragraph (g)(5)(ii) or has experienced a standard threshold shift.
- By any employee who in signed areas of client worksites.

Employees are given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by Kent Materials. Kent Materials provides training in the use and care of all hearing protectors provided to employees. Kent Materials ensures proper initial fitting and supervises the correct use of all hearing protectors.

Hearing Protector Attenuation

Kent Materials evaluates hearing protector attenuation for the specific noise environments in which the protector is used. Kent Materials uses the evaluation methods described in Appendix B: Methods for Estimating the Adequacy of Hearing Protection Attenuation. Hearing protectors used by Kent Materials attenuate employee exposure at least to an 8-hour time-weighted average of 90 decibels. For employees who have experienced a standard threshold shift, hearing protectors attenuate employee exposure to an 8-hour time-weighted average of 85 decibels or below. The adequacy of hearing protector attenuation is re-evaluated whenever employee noise exposures increase to the extent that the hearing protectors provided no longer provide adequate attenuation. Kent Materials provides more effective hearing protectors when necessary.

Training Program

Kent Materials trains each employee who is exposed to noise at or above an 8- hour time weighted average of 85 decibels. Kent Materials has instituted a training program and ensures employee participation in the program. The training program is provided before initial assignment and is repeated annually for each

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Employee included in the hearing conservation program. Information provided in the training program is updated to be consistent with changes in protective equipment and work processes. Kent Materials ensures each employee is informed of the following:

- The effects of noise on hearing.
- The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care.
- The purpose of audiometric testing and an explanation of the test procedures.

Access to Information and Training Materials

Kent Materials makes available to affected employees or their representatives copies of this standard and/or posts a copy in the workplace. Kent Materials provides to affected employees any informational materials pertaining to the standard that are supplied to (company) by the Assistant Secretary. Kent Materials provides, upon request, all materials related to Kent Material's training and education program pertaining to this standard to the Assistant Secretary and the Director.

Recordkeeping

Kent Materials maintains an accurate record of all employee exposure measurements required by paragraph (d) of this section. Kent Materials or Mobile Health Testing retains all employee audiometric test records to include:

- Name and job classification of the employee.
- Date of the audiogram.
- The examiner's (organization's) name.
- Date of the last acoustic or exhaustive calibration of the audiometer.
- Employee's most recent noise exposure assessment.

Kent Materials shall maintain accurate records of the measurements of the background sound pressure levels in audiometric test rooms.

Kent Materials retains the required records for at least the following periods.

- Noise exposure measurement records are retained for two years.
- Audiometric test records are retained for the duration of the affected employee's employment.

All records are provided upon request to employees, former employees, representatives designated by the individual employee, and the Assistant Secretary according to 29 CFR 1910.1020. If Kent Materials ceases to do business, Kent Materials shall transfer to the successor employer all records required to be maintained, and the successor employer shall retain them for the remainder of the period prescribed in 29 CFR 1910.1020.

Appendices

Appendices A, B, C, D, and E to 29 CFR 1910.95 are incorporated as part of this section and the contents of these appendices are mandatory.

Purpose

The Security Plan provides Kent Materials (KM) with a means to ensure that our employees and owner-operators plan and respond appropriately to secure their hazardous materials during transport.

Policy

It is the policy of Kent Materials to protect the general public from the health and physical hazards associated with the transportation of its hazardous materials.

Security Plan

The KM *Security Plan* meets the security requirements for *Offerors and Transporters of Hazardous Materials* identified in 49 CFR Chapter I Part 172; please refer to this document for additional information concerning security plans. [The web address for a current copy of the standard is www.gpo.gov/ecfr; scroll down to and click “Title 49 – Transportation; click “Go”; click “100-185”; click “172”; click “172-802”.] Additionally, general registration requirements, preparation and retention of shipping papers, training, and recordkeeping requirements are addressed. KM also has a security assessment and security plan that is controlled under 49 CFR parts 15 and 1520.

Hazardous materials carriers have the responsibility to ensure that a Security Plan is in place to safely transport hazardous materials. To eliminate / minimize risk of personnel, KM aggressively interviews and screens all employee and owner-operator job applicants. Background and criminal records are checked, in addition to references. Various levels of management are involved in the screening / interviewing process. Kent Material’s Security Plan also achieves security through its selection of primary and alternate routes between the points of origin and destination, and its en route security measures, and communicates this security information to its employees and owner-operators.

KM’s Security Plan objectives are to

- be in regulatory compliance,
- ensure employees and owner-operators understand and follow the Security Plan, and
- provide safe transport of hazardous materials to protect the general public.

KM’s organizational security structure is defined and managed by the USE Manager. KM Management exercises the ultimate decision regarding all aspects of the security plan. The dispatcher and drivers are responsible for acting upon and following the plan. The drivers take the following measures to enhance transportation security:

- Lock all doors of their trucks while en route.
- Do not pick up hitchhikers.
- Obey posted speed limits.
- Drive within weather conditions.

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- Conduct routine visual inspections of the truck and trailer to ensure mechanical integrity, and make sure loads are secured, hazardous material leaks are identified, etc.

KM drivers must be vigilant to recognize and respond to possible security threats, such as suspicious behaviors; drivers must report any suspicious behaviors that threaten their cargo to authorities by calling 911, and providing all of the information requested by the authorities.

In the event of a security breach (someone attempts to hi-jack or sabotage the truck and/or its hazardous materials), KM drivers are to

1. Abandon and lock the vehicle,
2. Seek safety a safe distance from the vehicle, and
3. Immediately contact 911, and provide information regarding their name, location of vehicle, nature of the emergency, and any other requested information.

KM has established the following procedure to secure the transportation of hazardous chemicals from its customer locations to its hazardous materials delivery locations:

1. Customer contacts KM via telephone landline to advise them of a load for transport.

Note: Drivers must follow the security plan steps as outlined, without deviation.

2. KM dispatch contacts driver via cell phone or landline concerning the load and its point of origin.

Note: Drivers and dispatcher do not use the radio to communicate any information that would compromise the safety of the transportation of their cargo.

3. KM dispatch contacts the customer via telephone landline to notify the customer of the driver's identity and the approximate time the driver should arrive.
4. Driver arrives to customer location and provides identification.
5. Customer verifies driver identification and conducts all other security checks.
6. Driver checks shipping papers for completeness and accuracy, then placards vehicle.
7. Driver selects route of travel.
8. Driver contacts KM dispatch via cell phone to inform dispatch of his departure.
9. Driver transports the hazardous chemical using the pre-determined primary route; if not possible, the driver notifies KM dispatch that he is taking "alternate route".

Note: In the event of a security breach, driver is to lock and abandon the vehicle, seek safety and immediately contact 911.

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10. KM dispatch contacts vendor at the hazardous materials delivery location via telephone landline and provides estimated time of arrival.

11. Driver contacts KM dispatch via cell phone or landline upon arrival at destination.

If driver does not contact KM dispatch at approximate scheduled arrival time, dispatch contacts driver to determine reason for the delay, and reacts accordingly.

Registration

All KM trucks and trucks leased to KM are registered with RSPA DOT (Research and Special Programs Administration of the Department of Transportation). It is the responsibility of each driver to ensure that a copy of the truck's registration or a document bearing the current registration number identified as the "U.S. DOT Hazmat Registration Number" is maintained on board the truck, and is current.

Shipping Papers

All drivers ensure that all shipping papers for each shipment of hazardous materials include the

- Name of the person offering the shipment,
- U.S. DOT Hazmat Registration Number of the person offering the shipment for transport, and
- name of the shipment consignor, the address from which the shipment originates, and the name and address of the person(s) to whom the shipment will be delivered.

The name and address of the consignor and each consignee may be included in an attachment to the shipping paper.

Note: Addresses must be street addresses; not P.O. Box, billing address, or corporate headquarters.

Training

All employees and owner-operators who transport hazardous materials for Kent Materials receive general awareness / familiarization training, function-specific training, and safety training. Training provides familiarity with the requirements of the security plan, completion of shipping papers and registration certificates, enables the driver to recognize and identify hazardous materials consistent with hazard communication, learn functions that each employee and owner-operator performs as they relate to the security plan, emergency response information, measures to protect the driver against hazardous material hazards, specific measures KM implements to protect drivers, and methods and procedures for avoiding accidents, such as proper procedures for handling packages containing hazardous materials. In regard to the specifics of the security plan, employees and owner-operators are trained in the following:

- Company security objectives
- Specific security procedures
- Employee or owner-operator responsibilities
- Actions to take in the event of a security breach

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nizational security structure

- Security issues and possible methods to enhance transportation security
- How to recognize and respond to possible security threats

All new employees who are hired as drivers to transport hazardous materials receive training within 90 days of employment. All other employees who have a change in job function that puts them in the position of transporting hazardous materials or some part of this Security Plan receive training. All HAZMAT employees receive recurrent training every three years.

Recordkeeping

From the date of issuance, a copy of each registration statement filed with RSPA DOT (Research and Special Programs Administration of the Department of Transportation) and each Certificate of Registration issued by RSPA is kept on file for a period of three years.

Each carrier maintains a copy of its current Certificate of Registration or another document bearing the registration number identified as the “U.S. DOT Hazmat Registration Number” issued by RSPA on board each truck and truck trailer.

Employee training records are retained in the personnel training files at the Port Allen office for three years and include:

- Employee or owner-operator name.
- The most recent training completion date.
- A description, copy, or the location of the training materials used.
- The name and address of the person providing the training.
- Certification that the employee or owner-operator has been trained and tested.

Safety Policies and Procedures

- Accident/Incident Reporting and Investigation
- Accident Prevention Signs & Tags
- Confined Spaces (Permit Required)
- Contraband
- Crane Safety (Lifting Equipment)
- Customer Field Policy and Procedure
- DOT/Haz Mat (HM 126)
- Defensive Driving
- Disciplinary
- Dump Truck and Trailer Safety
- Electrical Safety
- Emergency Evacuation/Fire Prevention
- Employee Training
- Employee Warning Notice
- Fall Protection
- Fire Safety; Fire Extinguisher
- Forklift
- Hand and Power Tools/Machinery
- HAZWOPER
- Hearing Conservation (Occupational Noise)
- Incident Reporting
- Job Competency
- Journey Management (Mitigating Road Transport Risks)
- Ladder Use
- Lockout / Tagout
- Manual Lifting
- Mobile Equipment
- New Employee Orientation / Safety Training
- Personal Protective Equipment
- Preventive Maintenance
- Safe Work Practices
- Short Service Employee (SSE)
- Spill Prevention / Response
- Welding, Burning and Cutting

ACCIDENT/INCIDENT REPORTING AND INVESTIGATION	Issue Date:	Kent Materials
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Policy

It is the Policy of Kent Materials to verbally report and document all accidents and incidents involving its employees (near misses/near hits, incidents resulting in injuries, work-related illnesses, equipment and facility damage, or environmental damage), and to investigate all accidents/incidents determined by Kent Materials Management and/or its clients.

Procedure

Accidents and incidents are reported and documented to inform supervisors, managers and fellow workers that some unsafe or unhealthy behavior or condition or potentially-damaging environmental condition has occurred, and to prevent other unsafe and unhealthy behaviors and conditions and potentially-damaging environmental conditions from occurring in the future. When the employee is no longer in harms' way, and the environment, equipment and facilities are no longer threatened, steps are taken to restore operations to normal, as effectively, efficiently and safely as possible.

Note: For the purposes of this Procedure, *accident* is defined as an "unpreventable incident" and *incident* is defined as an "unsafe, unhealthy or environmentally-damaging event".

Reporting and Managing Employee Accidents and Incidents

Report all accidents and incidents (illnesses)! This includes even first aid incidents and near misses/near hits. After the accidents/incidents (illnesses) are verbally reported, steps are taken to manage the accident/incident (illness); to minimize personal injury (illness) and suffering, equipment and property damage, and damage to the environment; and to minimize the number of recordable incidents.

1. For all accidents and incidents (illnesses), ***employee*** verbally contacts his/her respective supervisor immediately or as soon as is practical, and ***briefly*** describes
 - What happened and how,
 - who is ill or who was injured (if injuries),
 - where and when accident/incident (illness) occurred, and
 - blood/bodily fluid exposure (if any).
2. ***Supervisor*** notifies Operations Manager as soon as is practicable; Area Manager and/or Supervisor provide whatever assistance possible and necessary

3. If personal or company-owned vehicle involved in accident/incident, employee does not leave scene, but calls 911 to report accident/incident and follows instructions of law enforcement personnel.

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4. If medical attention is required for accident/incident involving injuries (illness),
- Certified employee provides First Aid/CPR (to level trained),
 - As necessary,
 - Operations Manager** makes decision where to take employee (occupational clinic, doctor or hospital) based on nature and extent of injuries (illness),
 - First Aider** accompanies injured (ill) employee to medical facility, and/or
 - Operations Manager or Supervisor** meets injured employee at medical facility.

The following first aid and medical treatment information is used to “manage” accidents/incidents (illnesses), to prevent the accident/incident (illness) from becoming a “recordable”:

- Non-Recordable include use of bandages, Band-Aids, gauze pads, butterfly bandages, sterile-strips; cleaning, flushing, soaking wounds; removal of objects using irrigation, swabs, tweezers, or other simple means; using non-rigid supports, finger guards, hot or cold therapy, or massages; drinking fluids for heat stress (first aids and doctor- assisted first aids); medical observations or counseling; negative x-rays, blood tests; medication for diagnostic purposes; tetanus shots.
- Recordables involve stitches, staples, etc.; removal of embedded objects; positive x-rays; prescription medicines in any dose; nonprescription medicines in prescription strengths; applying a cast or means of immobilizing injured part; physical therapy; chiropractic treatment; immunizations.

To manage the incident, *butterfly bandages* are used instead of *stitches*, a **cotton** swab or *tweezers* instead of complicated removal methods, or over-the-counter *pain relievers* instead of a *prescription*.

5. For all work-related accidents/incidents (illnesses), **Operations Manager** arranges for a post-accident drug screen when employee receives medical attention or at testing facility, according to *Drug and Alcohol Abuse Policy and Procedure*.
6. Once victim is stable, **Operations Manager** immediately calls HSE Manager at Kent Materials corporate office to verbally notify of the accident/incident.
7. If accident/incident (illness) results in a fatality or hospitalization of three or more employees (same incident), **HSE Manager** calls OSHA within eight (8) hours (1- 800-321-6742) and client

within twenty-four (24) hours; **HSE Manager** then completes **Employer's First Report of injury or Incident** form.

Note: Depending on the circumstances, if the employee refuses to see the Company

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Physician, disciplinary action, up to and including discharge, may be taken.

Documentation

Once the incident is reported, and as soon as practical, it is documented on an *Accident/Incident* Report form (see attached). The form is used to document all accidents and incidents (illnesses) and is completed within a maximum of twenty-four (24) hours from the time of the accident/incident (illness). The written report includes a detailed narrative statement, employee information, vehicle / equipment information, injury information, witness, etc.

1. **Supervisor** completes *Accident/Incident Report* form, with input from affected employee and others, by responding to items identified in boxes on form; responses must be complete and accurate, and reflect only facts associated with accident/incident (illness), with statements from employees and witnesses attached.
2. **Supervisor** faxes the completed Accident / Incident Report to the Corporate Safety Manager at # 225-930-4512.
3. **Supervisor** files completed Accident / Incident Report in the appropriate HSE file.
4. **HSE Manager** reviews the report for accuracy and completeness, and then places the copy in appropriate HSE file; if the report needs editing, HSE Manager converses with the Supervisor and/or employee to make corrections, then places in HSE file.

Accident/incident Investigation

Kent Materials requires an investigation for any accident/incident (illness) identified by OSHA as a "recordable" and any other accident/incident (illness) selected by Kent Materials Management or a Kent Materials client for investigation. All incidents are investigated to the appropriate level with regard to incident severity, using a root cause analysis process. Recordable are accidents/incidents (illnesses) that result in:

- Death,
 - days away from work,
 - restricted work or transferred to another job,
 - medical treatment beyond first aid,
 - loss of consciousness, or
 - a significant injury or illness diagnosed by a physician or other health care professional.
- Prior to any incidents, the **HSE Manager** puts together an investigating team that includes other selected employees.

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1. **HSE Manager** schedules investigation (date, time, location) with investigating team. Equipment needed, such as pencils, pens, paper, measuring tapes, camera, marking devices, etc. will be provided to assist in the investigation.
2. **Investigating Team** meets and conducts investigation within one (1) week of incident (unless extenuating circumstances).
3. **HSE Manager** generates written *Accident/Incident Investigation Report* with help and input from investigating team. This team immediately identifies and assesses the following possible evidence:
 - a. People (age, medical conditions, fatigue), equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.
 - b. Evidence such as people, positions of equipment, parts, and papers are preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment in a quick and timely manner to preserve the integrity of the accident scene.
4. Witness interviews are conducted and statements are recorded. Interviews are conducted in an office area void of any distractions or interference. Team members who are trained in interviewing techniques are used to perform the interviews. Unbiased testimony is sought. Follow-up interviews may be necessary.
5. **Investigating Team** determines proposed corrective action(s).
6. **HSE Manager** distributes *Accident/Incident Investigation Report* to Kent Materials Management for review.
7. **Kent Materials Management** reviews Accident/Incident Report and makes final determination regarding corrective action(s), and initiates corrective action(s).
An investigation of this type is considered formal, and is significant in providing the necessary information to eliminate or reduce the chances of an accident/incident (illness) similar to this occurring again: if the information is shared, if the underlying causes are discussed, and if the appropriate actions are taken. Lessons learned are documented and communicated in safety meetings in effort to prevent reoccurrence.

Root Cause Analysis

Once the investigation team has been assembled and data secured, a Root Cause Analysis is performed to determine the primary cause(s) of the incident or accident. Determining the root

cause(s) of any incident or accident allows management to make the necessary changes to prevent reoccurrence. Kent Materials uses two widely known and recognized methods to determine root causes; Why Tree and Five Why

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Methods. Why Tree Root Cause Analysis is performed on the more complex accidents or near misses. Five Why Root Cause Analysis is used when dealing with simpler accidents or near misses.

Why Tree Root Cause Analysis

Generally speaking, fixing the physical and human causes will only lead to short term fixes and not necessarily work in the best interest of preventing reoccurrence. The objective of the investigation team is to work through the physical and human / behavior causes to find and remove the system level root causes.

Scenario Explanation: An oil leak catches fire and almost burns someone. If we only focus on the oil leak, then the cause of the fire and the miss injury would not be determined. The primary event in this situation could be the near miss burn. We can investigate how to avoid burning people as well as the cause of the leak and the fire. How to avoid the leak and the fire will be identified as the Why Tree is developed.

The following steps are taken by the investigating team to develop a Why Tree:

1. Identify the primary event at the top of the tree.
 - a. (*Le.: Near Miss Burn*)
2. Each successive box captures the reason for the one directly above it.
 - a. (*I.e.: Person in Area, Fire in Area, Person almost comes in Contact*)
3. The bottom row of boxes (*I.e.: Oil leak, Ignition source, **Oxygen***) is usually physical causes.
 - a. These boxes should be very simple and basic, and relate only to the event above it.
4. Next work each branch of the Tree at a time (as shown in the diagram). Brainstorm all physical causes that reasonably could have caused the initial actions or conditions.

This is where the “why” fits into the Why Tree. “Why or how could this have happened?”

5. Rule out brainstormed physical causes by applying the facts learned, if it is not valid in this particular case, “X” it off.

6. If you determine it is a valid cause, but is a proper condition, write “Proper Condition” below the cause (as shown in the diagram).

7. Stop asking “Why” when you:

- a. Find a root cause that you have control to fix (*Le.: Ignition Source*)
- b. When a proper condition is identified (*I.e.: Oxygen Present*)
- c. When a cause is not a “true” factor in the incident

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8. Once the root cause(s) are identified, circle them.

- A “proper condition” is a condition in which the equipment or process was designed and intended to operate, and is accepted by the investigating team as not needing to be fixed.
 - a. (*I.e.: Oxygen Present. Since people are located in the building, oxygen must be there. So although oxygen is a cause of the fire, it is a proper condition.*)
- Often there are several successive physical causes. Add as many as you need. For example; *the oil leaked because the pipe broke, the pipe broke from vibration, and the vibration was attached to a malfunctioning pump.*
- Through interviews, identify the possible human / behavioral causes for each physical cause. A human / behavioral cause can be something that a person did or didn’t do. For example; *a bearing could be dry because no one lubricated it.*
- Look for failed processes or failure to follow procedures. Keep in mind that this is not a fault finding exercise. A procedure that was not followed does not imply blame, but may mean a failure in the management System.

Typical management systems causes might include: processes which do not exist or are wrong or misleading, not covered in training, lack of preventive maintenance, lack of audits, etc.

- Why Trees take many forms and sometimes take two or more pages.

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Five Why Root cause Analysis

The Five Why is a simplified version of the Why Tree and it is used by Kent Materials for less complex investigations. This analysis may be used by a single investigator or a small investigating team. The through process and objectives are similar to the Why Tree method, except here the focus is on just one or two root causes (that most likely would have prevented the event).

The following steps are taken to perform the Five Why method:

1. Define resulting incident.
2. Investigate a failure by simply asking and answering the question “Why”. This can be done by writing out the questions and answers. Do NOT do this in your head!
 - At each level, verify the results before moving on. Do NOT make assumptions.

- The root cause will likely be determined by the 5th answer (or Why box). If not, continue until a system level cause is reached.
- Identify the one or two root causes that most likely would have prevented the event.
- If there are clearly multiple branches and root causes, STOP and use the Why Tree method instead.

For either Root Cause Analysis methods some basic elements to consider include:

- **Materials**
 - o Defective raw material
 - o Wrong type of job
 - o Lack of raw material
- **Machine / Equipment**
 - o Incorrect tool selection
 - o Poor maintenance or design
 - o Poor equipment or tool placement
 - o Defective equipment or tool
- **Environment**
 - o Orderly workplace
 - o Job design or layout of work

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- o Surfaces poorly maintained
 - o Physical demands of the task
 - o Forces of nature
- **Management**
 - o No or poor management involvement
 - o Inattention to task
 - o Task hazards not guarded properly
 - o Horseplay
 - o Stress demands
 - o Lack of process
- **Methods**
 - o No or inadequate process
 - o Practices not same as written procedures
 - o Poor communication
- **Management System**
 - o Training or education lacking
 - o Poor employee involvement
 - o Poor recognition of hazard
 - o Previously identified hazards were not eliminated

Training

Training is accomplished by reviewing the contents of this Policy and Procedure with all employees when first hired and as needed thereafter. Verification of understanding of the information contained in this Policy and Procedure is accomplished by completing an Accident/incident Report (based on a real-world scenario). Training is recorded on a *Training Register* form (see *Employee Training Plan*); the *Employee Training Matrix Report* is updated to reflect the training received.

The methods used in Kent Materials investigations are either determined by Kent Materials and/or the client at the time of the accident/incident (illness). Additional training may be necessary if members of the investigating team do not have the knowledge and skill to perform their roles and responsibilities according to the *Accident / Incident Investigation* and selected *Root Cause Analysis* techniques.

Recordkeeping

- *Training Registers* are placed in appropriate HSE files and maintained for two (2) years, then discarded.
- *Performance-Based Training Incident Reports* completed during the training session are attached to *Training Registers*, placed in appropriate HSE files and maintained for two (2) years, then discarded.
- Copies of completed *Accident/Incident Investigation Reports* and paperwork related to an investigation are placed in appropriate HSE files and maintained until employees are retrained, then discarded.

Standard: 29 CFR 1904.35 *Employee involvement*

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- (a) *Basic requirement. Your employees and their representatives must be involved in the recordkeeping system in several ways. (1) You must inform each employee of how he or she is to report an injury or illness to you. (2) You must provide limited access to your injury and illness records for your employees and their representatives. (b) Implementation. (1) What must I do to make sure that employees report work-related injuries and illnesses to me? (i) You must set up a way for employees to report work-related injuries and illnesses promptly; and (ii) You must tell each employee how to report work-related injuries and illnesses to you.*

[Web address is www.gpoaccess.gov/lecf in *Browse*, scroll down to and click “Title 29 –Labor”; click “GO”; search and click 1900-1910 (1901.1-1910.999); search and click Subpart C: Recordkeeping Forms and Recording Criteria; Subpart 0: Other OSHA Injury and Illness Recordkeeping Requirements; and 1904 (search and click “1904.35 Employee involvement”)]

**ACCIDENT/INCIDENT REPORTING
AND INVESTIGATION**

Issue Date:

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**Kent
Materials****COMPLETE and FAX to HSE Manager
WITHIN 24 HRS**

Division/location:_____

Supervisor:_____

ACCIDENT/INCIDENT REPORT**PART I: EMPLOYEE INFORMATION**Name: _____ SSN (Last 4): _____
(First) (M.I.) (Last)Mailing Address: _____
(Street) (City) (State) (Zip Code)

Phone Number: (_____) _____ Date of Birth: (mm/dd/yyyy) _____

Job Position/Title: _____ Date of Hire: (mm/dd/yyyy) _____

PART II: ACCIDENT/INCIDENT INFORMATION**SECTION 1: Accident/Incident**

Date of Incident: (mm/dd/yyyy)_____ Time of Incident: _____(Circle: AM/PM)

Date Reported: (mm/dd/yyyy)_____ Time work started _____(Circle: AM/PM)

Location of incident:_____

What The Employee doing just before the incident:_____

Describe Incident:_____

(If additional space is needed, use line paper)

What appears to be the injury or illness:_____

Employee Signature:_____ Date: (mm/dd/yyyy)_____

(employee signature verifies that the above information is accurate and contains all available information relevant to the incident or accident)

Supervisor Signature: _____

**ACCIDENT/INCIDENT REPORTING
AND INVESTIGATION**

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**Kent
Materials****SECTION 2: Witness**

Witness Name(s):

Phone Numbers:

(_____)_____

(_____)_____

(_____)_____

(_____)_____

NOTE: Attach Witness Statements with Report**SECTION 3: Vehicle/Equipment**

Equipment Type: _____ Vehicle Type: _____

VIN/Serial #: _____ Year: _____ Make/Model _____ State: _____

VIN/Serial #: _____ Year: _____ Make/Model _____ State: _____

SECTION 4: Injury

Injured Employee: _____	Phone # (____) _____
Name of Physician or LHCP: _____	
Facility Name: _____	Phone # (____) _____
Facility Address: _____	
(Street)	(City) (State) (Zip Code)
Blood borne Pathogens to Others: <input type="checkbox"/> No Exposure <input type="checkbox"/> Potential <input type="checkbox"/> Exposure	
Treated in Emergency Room: (Circle Yes or No)	
Hospitalized overnight as in in-patient: (Circle Yes or No)	
Prescription given: (Circle Yes or No)	
Describe Treatment: _____	

Injured Employee: _____	Phone # (____) _____
Name of Physician or LHCP: _____	
Facility Name: _____	Phone # (____) _____
Facility Address: _____	
(Street)	(City) (State) (Zip Code)
Treated in Emergency Room: (Circle Yes or No)	
Hospitalized overnight as in in-patient: (Circle Yes or No)	
Prescription given: (Circle Yes or No)	
Describe Treatment: _____	

ACCIDENT/INCIDENT REPORTING AND INVESTIGATION	Issue Date:	Kent Materials
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ACCIDENT/INCIDENT INVESTIGATION REPORT

Investigation Team Members: _____ _____ _____		
Employee Involved in Incident:	Location:	Date of Accident/Incident:
<div style="display: flex; justify-content: space-around; align-items: center;"> <div> <input type="checkbox"/> Five Why </div> <div> Indicate Root Cause Method </div> <div> <input type="checkbox"/> Why Tree </div> </div>		

Kent Materials	Policies and Procedures	Issue 8-20-03
	ACCIDENT PREVENTION SIGNS AND TAGS	Rev. date 4/19/2011
1. Identify Primary Event (Step I of Procedure):	1. Identify Primary Event:	
2. Reasons for the Primary Event (Step 2):	2. Why:	
3. Physical Causes for the Reasons (Step 3):	3. Why:	
4. Brainstorm each Branch of the Tree as to	4. Why:	
5. List Only what are Valid Causes to the	5. Why:	
6. Ask Why to determine Root Cause (step 7):	6. Why:	
8 Suggested Corrective Action(s):		
HSE Manager's Name:	Signature: Date:	

Purpose

The Accident Prevention Signs and Tags Policy and Procedure provides Kent Materials (KM) with a means to provide employees and owner-operators guidance regarding OSHA 29 CFR 19 10.145, Specifications for Accident Signs and Tags.

Policy

It is the policy of KM that all employees and owner-operators understand the health, safety and environmental messages of accident prevention signs and tags in the workplace.

Kent Materials	Policies and Procedures	Issue 8-20-03
	ACCIDENT PREVENTION SIGNS AND TAGS	Rev. date 4/19/2011

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Safety signs and accident prevention tags are used in the various environments where KM employee's and owner-operators work; employee's and owner-operators knowledge regarding the meaning of these signs and tags provide safety for themselves and co-workers.

1. HSE Manager ensures that all accident prevention signs and tags are recognized by employees, which inform of workplace hazards by providing the appropriate information.
2. HSE Manager provides employees with the different meanings, colors, proper designs and postings of signs with this policy and procedure.

a. **Danger Signs** – Danger signs indicate immediate danger and special precautions are necessary. There are no variations in the type of design of signs posted to warn of specific dangers and radiation hazards. Danger sign colors are red, black and white in opaque glossy as specified in CIE Standard Source “C” HAZARDOUS (ANSI Z53.1-latest version, incorporated by reference as specified in Sec. 1910.6).

b. **Caution Signs** – Caution signs are used only to warn against Potential hazards or to caution against unsafe practices. Employees are instructed that caution signs indicate a possible hazard against which proper precautions should be taken. Standard colors of a caution sign consist of a yellow background, black panel with yellow letters. The colors are those of opaque glossy samples as specified in Table 1 of ANSI Z53.1-latest version.

c. **Safety Instruction Signs** – Safety instruction signs are used where there is a need for general instructions and suggestions relative to safety measures. The background is standard color **ART** white, a green panel with white letters. Any letters used against “the white backgrounds are black. The colors shall be those of **MATTER HOW SLIGHT** opaque glossy samples as specified in Table 1 of ANSI Z53.1- latest version.

d. **Warning Signs** – Warning signs are used to represent a hazard level between “Caution” and “Danger”. Warning signs are orange or predominantly orange, with lettering or symbols in a contrasting color.

e. **Biological Hazard Signs** – Biohazard signs are used to signify the actual or potential presence of a biohazard and to identify equipment, containers, rooms, materials, experimental animals, or combinations thereof, which contain, or are contaminated with, viable hazardous agents. Biological hazards, or biohazards, include only those

Kent Materials	Policies and Procedures	Issue 8-20-03
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agents presenting a risk or potential risk to the well-being of man. Biohazard warning signs are florescent orange or orange/red letters and include the biohazard symbol in black.

f. All of the signs have rounded or blunt corners (free of sharp edges, burrs, splinters or other sharp projections).

g. The fastening devices used to post the signs are located in a manner in which they do not create a hazard.

NOTE: The wording of any sign should be easily read and concise. The sign should contain sufficient information to be easily understood. All signs are written in English.

Accident Prevention Signs that are missing, unreadable, and/or misplaced are identified to the appropriate supervisor on location; the supervisor replaces these signs as soon as possible.

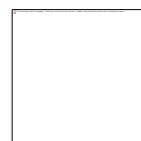
3. HSE Manager provides the employees with the different meanings and postings of each tag within this policy and procedure.

a. **Danger Tags** – Danger tags are only used in situations where major hazard situations present a threat of death or serious injury to employees.

b. **Caution Tags** – Cautions tags are only used in situations where there are minor hazard levels that are deemed non-immediate or the potential hazard or unsafe practice presents a lesser threat of employee injury.

c. **Warning Tags** – Warning tags are used to represent a hazard level between “Caution” and “Danger”, provided the tags have a signal word of “Warning,” and an appropriate major message.

d. **Biological Hazard Tags** – Biological hazards tags are used to identify the actual or potential presence of a biological hazard and to



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pment, containers, rooms, or combinations thereof that contain or are contaminated with hazardous biological agents.

e. Tags are affixed as close as safely possible to their respective hazards by a positive means such as plastic wraps, string, wire or adhesive that prevents their loss or unintentional removal.

NOTE: Tags are used until such time as the identified hazard is eliminated or the hazardous operation is completed. Tags are not used where signs, guarding or other positive means of protection are being used.

Accident Prevention Tags that are missing, unreadable, and/or misplaced are identified to the appropriate supervisor on location; the supervisor replaces these signs as soon as possible.

Signs and Tags are used as a means to prevent accidental injury or illness to employees who are exposed to hazardous or potentially hazardous conditions, equipment or operations that are out of the ordinary, unexpected or not readily apparent.

[The web address for a current copy of the standard is www.gyo.ov/ecfr scroll down to and click “Title 29 — Labor”; click “Go”; click “1900-1910”; click “1910”; click “1910.145 Specifications for accident prevention signs and tags”.]

Safety Color Coding

Related to the specifications associated with signs and tags are the safety colors of other items in the workplace: standardized paint colors of equipment and materials, or specific machinery parts, aids employees in focusing attention on potential hazards in their work area to indicate danger, caution or notice of safety-related information. KM attempts to maintain consistent color identifications in the following areas:

	SIGNS AND TAGS	4/19/2011
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Red is the basic color for the identification of fire protection equipment and apparatus.

- Red indicates **Danger** regarding safety cans or other portable containers of flammable liquids having a flash point at or below 80°F.
- Table containers of flammable liquids are painted red with some additional clearly visible identification either in the form of a yellow band around the can or the name of the contents conspicuously stenciled or painted on the can in yellow.
- Danger signs are painted red.
- Emergency stop bars on hazardous machines are red. Stop buttons or electrical switches where letters or other markings appear and used for emergency stopping of machinery are red.
- Yellow is the basic color for designating **Caution** and for marking physical hazards such as striking against, stumbling, falling, tripping, and caught-between objects or machinery.

Training

HSE Manager ensures that employees receive Accident Prevention Signs and Tags training at least initially through a review of this policy and procedure. Refresher training is provided at Management's discretion. HSE Manager documents training and places the documents in the appropriate training file.

ASBESTOS	Issue Date: 7/29/10	Kent Materials
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	Revision Date:	
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NOTE: Kent Materials employees are not exposed to asbestos. This program would apply if operations were to change and an exposure to asbestos would occur. The management of Kent Materials does not foresee a change in operations where an exposure to asbestos would occur.

Policy

It is the policy of Kent Materials to protect employees from the potential hazard of asbestos in the workplace by providing this written procedure in the event the TWA and/or excursion limit is exceeded.

Procedures

Kent Materials would monitor the workplace to ensure no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter of air as an eight (8)-hour time-weighted average (TWA). Kent Materials would monitor the workplace to ensure no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of thirty (30) minutes. Kent Materials has no asbestos in its operations, but would monitor the presence of asbestos in the client's workplace by accomplishing the following:

1. Upon arrival in client's workplace, Kent Materials supervisor asks person- in-charge (PIC) if there is any asbestos on the premises.
2. If PIC indicates there is no asbestos present, nothing more is done.
3. If PIC indicates there is asbestos present, Kent Materials supervisor obtains copy of client's written Asbestos Policy and Procedure and reviews it to determine:
 - a. Establishment, demarcation, access, provision of respirators and prohibited activities of regulated areas.
 - b. Engineering controls and work practices of methods of compliance (ventilation, particular tools, particular products and operations, air and flooring).
 - c. Written compliance program if TWA and/or excursion limits are exceeded.
 - d. Respiratory protection and respiratory protection program in place.
 - e. Protective work clothing and PPE requirements (provision and use, removal and storage, cleaning and replacement).
 - f. Hygiene facilities and practices (change rooms, showers, lunchrooms and smoking in work areas).
4. Kent Materials supervisor asks client representative to provide him and his crew with information regarding presence of asbestos hazards:
 - a. Location of asbestos-containing materials (ACM) or presumed asbestos-containing materials (PACM). (Locations that asbestos may be found includes but is not limited to: insulation, floor tiles, sound proofing, ceiling

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tiles, pipe insulation, roofing felts, etc.³

- b. Warning signs indicating the location of ACM or PACM.
- c. Warning labels affixed to all raw materials, mixtures, scrap, waste, debris, and other products contact asbestos fibers (and their containers).
- d. Material Safety Data Sheets (MSDS) pertaining to asbestos products.

Employees are to abide by the warning signs and labels, and are prohibited from disturbing asbestos containing materials.

Kent Materials provides information to its employees prior to the start of work according to the Hazard Communication (Right-To-Know) standard by reviewing the MSDS and information obtained from the client's Asbestos Policy and Procedure.

- Health effects associated with asbestos exposure, such as respiratory disease and various types of cancer.
- Relationship between smoking and exposure to asbestos producing lung cancer.
- Quantity, location, manner of use, release, and storage of asbestos and specific nature of operations which could result in exposure to asbestos.
- Engineering controls and work practices associated with work to be performed.
- Specific procedures to protect employees from exposure to asbestos (work practices, emergency and clean-up procedures and PPE).
- Purpose, proper use and limitations of respirators, gloves, head coverings, face shields, vented goggles and protective clothing.
- Purpose and description of medical surveillance program required by client.
- Content of this standard (29 CER 1910.1001 Asbestos).
- Names and phone numbers of public health organizations.
 - o The National Cancer Institute (800) 422-6237.
 - o American Cancer Society (404) 320-3333.
 - o American Heart Association (214) 750-5300.
 - o American Lung Association (212) 245-8000.
- Requirements for posting signs and affixing labels and their meanings.

Kent Materials has copies of the complete standard and its appendices readily available at no cost to all affected employees. Kent Materials provides approved respirators at no cost to its employees and ensure they are used in the following circumstances: work practice controls, work operations, to reduce exposure and in emergencies.

The other duties, responsibilities and requirements associated with the client's *Asbestos Policy and Procedure* remain with the client:

- Housekeeping.
- Vacuuming.
- Waste Disposal.
- Medical Surveillance.

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- Recordkeeping.
- Observation Procedures

If working at multi-contractor worksites where employees are immediately adjacent to a Class I asbestos job (due to inadequate containment), employees would be removed from the area until the closure breach is repaired or an initial exposure assessment is performed.

Training

Training is required and is accomplished by reviewing the contents of this Policy and Procedure with employees exposed to airborne concentrations at or above PEL at initial assignment and at least annually thereafter, and if employees work in any area in which asbestos may be present. This training is documented. Verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee successfully pass a written test (see *Performance-Based Training* section). Training is recorded on the *Training Report* to reflect the training received.

Recordkeeping

Performance-Based Training Test completed during the training session is placed in appropriate 1—ISE files and maintained for two (2) years, then discarded.

Standard: 29 CFR 1910.1001 Asbestos

a) Scope and application. (1) This section applies to all occupational exposures to asbestos in all industries covered by the Occupational Safety and Health Act except as provided in paragraph (a)(2) and (3) of this section. (2) This section does not apply to construction work as defined in 29 CFR 1910.12(b). (Exposure to asbestos in construction work is covered by 29 CFR 1926.1101). (3) This section does not apply to ship repairing, shipbuilding and ship breaking employments and related employments as defined in 29 CFR 1915.4. (Exposure to asbestos in these employments is covered by 29 CFR 1915.1001).

c) Permissible exposure limit (PELS) — (1) Time-weighted average limit (TWA). The employer shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter of air as an eight (8)-hour time-weighted average (TWA) as determined by the method prescribed in Appendix A to this section, or by an equivalent method.

(2) Excursion limit. The employer shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (lf/cc) as averaged over a sampling period of thirty (30) minutes as determined by the method prescribed in Appendix A to this section, or by an equivalent method.

(7) Employee information and training. (i) The employer shall institute a training program for all employees who are exposed to airborne concentrations of asbestos at or above the PEL and/or excursion limit and ensure their participation in the program. (ii) Training shall be provided prior to or at the time of initial assignment and at least annually thereafter. (iii) The training program shall be conducted in a manner which the employee is able to understand. The employer shall ensure that each employee is informed of the following: (A) The health effects associated with asbestos exposure; (B) The relationship between smoking and exposure to

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asbestos producing lung cancer (The quantity, location, manner of use, release, and storage of asbestos, and the specific nature of operations which could result in exposure to asbestos; (D) The engineering controls and work practices associated with the employee's job assignment; (E) The specific procedures implemented to protect employees from exposure to asbestos, such as appropriate work practices, emergency and clean-up procedures, and personal protective equipment to be used; (F) The purpose, proper use, and limitations of respirators and protective clothing, if appropriate; (G) The purpose and a description of the medical surveillance program required by paragraph (I) of this section; (H) The content of this standard, including appendices, (I) The names, addresses and phone numbers of public health organizations which provide information, materials, and/or conduct programs concerning smoking cessation. The employer may distribute the list of such organizations contained in Appendix I to this section, to comply with this requirement. (J) The requirements for posting signs and affixing labels and the meaning of the required legends for such signs and labels.

LWeb address is www.gpoaccess.gov/ecfr in Browse, scroll down to and click “Title 29 – Labor”; click “GO”; search and click 1910 (1910.1000-end); search and click 1910.1000 to 1910.1450; search and click “1910.1 001 Asbestos”]

PERMIT-REQUIRED CONFINED SPACE ENTRY	Issue Date: 7/29/10	Kent Materials
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**NOTICE: This Policy and Procedure is for knowledge only.
Kent Materials personnel do not enter confined spaces.**

Policy

It is the Policy of Kent Materials that no one enters a permit-required confined space unless the confined space is rendered safe, personnel are properly trained and authorized to enter, and entrants follow this Procedure.

Procedures

Permit-required confined space entry may involve only Kent Materials employees, but proper coordination and communication is essential to their success and safety. Kent Materials may share this procedure with clients and/or contractors to ensure personnel have a complete understanding of the duties and responsibilities of Kent Materials personnel regarding confined space entry operations when working at clients' facilities.

A **Confined space** is defined as any space that meets ALL of the following conditions:

- Any space/area large enough and so configured that a human can bodily enter and perform assigned work.
- Any space/area with limited or restricted means of entry or exit.
- Any space/area not designed for continuous human occupancy.

A **permit-required confined** space is defined as a confined space meeting **ANY ONE** of the following conditions:

- Any confined space that contains/has potential to contain an atmospheric hazard.
- Any confined space that contains a material that has the potential for engulfing an entrant.
- Any confined space which has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a small cross-section.
- Any confined space containing any other recognized serious safety or health hazards.

Kent Materials client's facilities have confined spaces as defined above. However, Kent Materials **prohibits entry of its employees into any and all confined spaces unless they are properly trained and entry is required by the client.** If confined space entry, and more importantly permit-required confined space entry, is required, it will utilize contractors. Confined spaces or permit-required confined spaces are identified as indicated below.

DANGER
CONFINED SPACE
AUTHORIZED PERSONNEL ONLY
DANGER

DANGER
PERMIT-REQUIRED CONFINED SPACE
AUTHORIZED PERSONNEL ONLY
DANGER

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Pre-Entry

Prior to entry into a confined space, the confined space is prepared, the equipment is collected (PPE, fire extinguishers, gas detectors, ventilation, and rescue equipment), and the Confined Space Entry Permit is completed, usually in that order. The Entry Supervisor coordinates the preparation of the confined space with the entrants and the collection of the equipment with the attendant. A pre-job safety meeting is held to review the contents of the Permit (including hazards identified during the hazard evaluation of the space to be entered) with every person involved with the confined space entry. Entrants or their representative may participate in and review calibrated air monitoring data, re-evaluate the space and request additional air monitoring at any time. The Entry Supervisor ensures the following:

1. Confined space is shut down (by turning off switches or shutting down upstream processes), isolated (by closing valves), and/or prepared for cleaning or flushing (pressure bled and/or liquids drained, as applicable).
2. Devices that control hazardous energy relating to confined space are locked and/or tagged; if necessary, blind flanges are installed on incoming piping.
3. Hazards inside confined space are eliminated or controlled by purging with nitrogen or some other inert gas and/or by flushing with water or some other cleansing agent and/or by ventilating using exhaust or blower fans.
4. Communications equipment authorized entrant(s) and attendant will use to maintain contact during entry is in good condition and operational.
5. Equipment required for this confined space entry (PPE, rescue, fire extinguisher, barricades) is in good condition and ready to use.
6. Additional permits required for work being performed in conjunction with confined space entry are completed (hot work permit, JSEA, etc.) and signed by proper person(s).

Entry Permit

The **Entry Supervisor** is designated and provided to complete or ensure that the following is completed on the confined space entry permit (see *Confined Space Entry Permit* attached, or equivalent):

1. Identify specific confined space to be entered (tank, vessel, pipe, etc.).
2. Identify purpose of confined space entry (repair, clean, service, inspect, etc.).

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3. Write in date of planned entry and expected duration (in hours); a new permit is completed if job or work extends beyond shift change or expected duration.
4. Identify name(s) of entrant(s) planning to enter confined space.
5. Identify name(s) of attendant(s) selected to monitor entry operations.
6. Identify hazards present in confined space; consider hazards in confined space, hazards associated with additional permits required for work to be performed, and/or refer to hazardous chemical's MSDS for specific information.
7. Verify confined space is shut down, isolated (valves closed, electricity disconnected), and pressure bled down and/or liquids properly drained from confined space.
8. Verify hazardous energy devices are locked and/or tagged.
9. Verify hazards are eliminated or controlled inside confined space through personal observations.
10. Conduct initial tests for oxygen, combustible gases and vapors, and/or toxic gases and vapors (in that order); record results on permit in appropriate areas.
11. Verify rescue and emergency services are available! Can be easily obtained.
12. Verify communications equipment used by authorized entrants and attendant to maintain contact during entry is working.
13. Verify all equipment required for this confined space entry has been collected, is in good condition and is ready to be used/in use by entrants and/or attendant.
14. Verify all entry conditions are acceptable through personal observations.
15. Identify Entry Supervisor; signs permit in appropriate space to authorize entry.
16. During entry operations, attendant conducts periodic tests for oxygen, combustible and toxic gases/vapors at *least every half-hour*, and records results onto permit in appropriate areas.

The completed permit is available at the time of entry to all authorized entrants, and is posted at or near the entrance so the entrants can confirm pre-entry preparations are complete, conditions are safe to enter, and the Entry Supervisor has authorized entry.

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Kent Materials personnel retain each canceled entry permit for at least one year to facilitate the review of the permit-required confined space entry program. Any problems encountered during an entry operation are noted at the bottom or on the back of the applicable permit so appropriate revisions to the program can be made. If no confined space entries are conducted during the year, no review is necessary.

Entry

Once the pre-entry steps have been completed and entry is authorized into the confined space, preparations are completed and personnel enter the confined space. The **Entry Supervisor** accomplishes the following duties prior to and during entry operations:

1. Conducts a safety meeting prior to entry to review hazards, including information on mode, signs or symptoms, and consequences of exposure, as identified on entry permit; reviews testing specified by permit.
2. Prepares to terminate entry and cancel permit if either of following occur:
 - Operations covered by entry permit have been completed, or
 - conditions not allowed under entry permit arise in or near confined space.
3. Removes unauthorized individuals who enter and/or prevents unauthorized individuals who attempt to enter confined space during entry operations; ensures barrier protection is in place to prohibit vehicular traffic.
4. Determines that entry operations remain consistent with terms of entry permit and acceptable conditions are maintained.
5. If applicable, coordinate entry operations with the entry supervisor of other employers. (NOTE: this is extremely an unlikely scenario.)

The **attendant** is designated and provided to accomplish the following duties prior to the entrant(s) entering the confined space and during the time the entrant is working in the confined space:

1. Attends safety meeting held prior to entry to review testing and hazards, including information on mode, signs or symptoms, and consequences of exposure, as identified on Entry Permit.
2. Places fire extinguisher near entrance to confined space.
3. If entry is from top of confined space, assembles rescue equipment above or near top opening and, if necessary, places ladder for entry and exit.
4. Reviews possible behavioral effects of hazard exposure on authorized entrants.

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5. Continuously maintains an accurate count of authorized entrants in confined space and ensures means to identify each entrant accurately.

6. Remains outside of confined space during entire entry operation until relieved by another qualified attendant (identified on Permit).

7. Communicates with authorized entrants as necessary to monitor status and to alert them of need to evacuate confined space.

8. Monitors all activities inside and outside of confined space to determine if safe for entrants to remain in confined space.

9. Orders entrants to evacuate confined space immediately under any of following conditions:

- detects a prohibited condition,
- detects behavioral effects of hazard exposure in entrant,
- detects situation outside space that could endanger entrants, or
- cannot effectively and safely perform all required duties.

10. Summons rescue and other emergency services when entrants need assistance to escape from confined space.

11. Takes following actions when unauthorized persons and/or vehicles approach or enter permit space while entrants are working in confined space:

- warns unauthorized persons they must stay away from confined space,
- advises unauthorized persons they must exit immediately if entered confined space, and
- informs authorized entrants and Entry Supervisor if unauthorized persons have entered confined space.

12. Performs non-entry rescues according to procedures established by Kent Materials.

The attendant monitors only one confined space at a time and does not perform any other duties that might interfere with the attendant's primary duty: to monitor and protect the authorized entrants.

The **authorized entrants** are designated to accomplish the following duties prior to entering and while working in the permit-required confined space:

1. Attend safety meeting held prior to entry to review testing and hazards, including information on mode, signs or symptoms, and consequences of exposure, as identified on Entry Permit.
2. Don and use proper PPE and other equipment identified on Permit while in confined space (body harness or wristlets, safety belts, lifelines, etc.).
3. Continuously verify communications equipment is working.

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4. Prepare to conduct work inside confined space while remembering following:
 - Use of ignition sources is performed ONLY in flammable-free atmosphere.
 - Use air-supplied breathing device if inert gas used to prevent ignition.
 - Ground all electrical tools and equipment.
 - Lighting equipment must not be more than 12 volts and must be explosion proof; electrical connections (plug-ins) are made outside confined space.
5. Alert attendant whenever they:
 - recognize any warning signs or symptoms of dangerous situation, or
 - detect a prohibited condition (see above).
6. Exit from confined space as quickly as possible whenever:
 - Order to evacuate is given by attendant or Entry Supervisor,
 - entrant recognizes any warning signs or symptoms of dangerous situation,
 - entrant detects a prohibited condition, or
 - evacuation alarm is activated.

Post-Entry

After the work within the confined space is complete, the entrants and attendant take the proper steps to restore the work space to its original condition:

1. Inspect interior for any tools, materials, etc.; clean up inside confined space.
2. Remove and store all ventilating devices (fans or blowers).
3. Close and secure all previously-opened doors, hatches, covers, etc.
4. Remove any blind flanges, as applicable.
5. Connect and secure any piping disconnected to isolate confined space.
6. Close all drain and/or bleed valves; if vessel or tank, put back in service (open inlet and outlet valves, engage sensing and safety devices, etc).
7. Remove all tag and lockout devices from equipment and, if necessary, restore power.
8. Remove entry permit and present to Entry Supervisor; Entry Supervisor places permit in appropriate HSE files (closing out/terminating the permit).
9. Properly restore and/or replace all PPE, safety and rescue equipment

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10. If respirators were used during entry, restore them; if fire extinguishers were discharged, recharge them.

If the entry operations do not provide enough protection for employees (through post- entry review), these procedures are revised prior to subsequent entries.

Rescue and Emergency Services

The contract company hired to perform confined space entry may also be the company that provides emergency service for rescue within a permit-required confined space when rescue cannot be accomplished by non-entry. Outside service companies providing rescue are given the opportunity to examine the entry site and practice rescues, and to decline providing the service if the hazards are too great. If IDLH conditions are present, rescue organizations are present during the entire entry operation.

Note: Company personnel do not rescue victim(s) from permit-required confined spaces unless properly trained in the use of SCBA and authorized by the company to attempt a rescue.

Company personnel facilitate non-entry rescue by using retrieval systems or methods, unless the retrieval equipment increases the overall risk of entry or would not contribute to the rescue of the entrant. If retrieval systems are used, they must meet the following requirements:

- Each authorized entrant uses a chest or full body harness with a retrieval line attached at the center of the entrant's back near shoulder level, above the entrant's head, or at another point which presents a profile small enough for the successful removal of the entrant. Wristlets are used instead of the harness if the client demonstrates use of a harness is unfeasible or creates a greater hazard, and the use of wristlets is the safest and most effective alternative.
- The other end of the retrieval line is attached to a mechanical device or fixed point outside the permit space in such a manner that rescue can begin as soon as the rescuer becomes aware rescue is necessary. A mechanical device must be available to retrieve personnel from vertical type confined spaces more than five feet deep.

When an entrant is in need of rescue and the rescue is possible without entering the confined space, the attendant and others available in the area accomplish the following:

1. Summons rescue and emergency services.
2. Engage mechanical device to raise or pull entrant from confined space.
3. Administer First Aid/CPR to level trained, until additional medical services arrive.

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If it is not possible to wait for help to arrive:

1. Prevent unauthorized personnel from attempting rescue,
2. put on safety belt/harness and attach lifeline,
3. don respirator and proper protective clothing,
4. enter space and remove victim, and
5. Administer FA/CPR to level trained and/or transport victim to medical facility.

The attendant continues to assist until the entrant is rescued and given first aid and/or transported to a medical facility for additional medical care and attention.

Training

Training is accomplished by reviewing the contents of this Policy and Procedure with affected employees only, prior to initial assignment, prior to a change in assigned duties, and if a new hazard has been created or special deviations have occurred. Verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee successfully pass a written test and prepare a Confined Space Entry Permit based on a scenario (see *Performance-Based Training* section). Training is recorded on the *Training Report* to reflect the training received. Training certificates include the employee name, trainer signature/initials, date(s) of training, and is available to the employee and their authorized representative.

Recordkeeping

Performance-Based Training Test and Confined Space Entry Permit completed during the training session are placed in appropriate HSE files and maintained for two (2) years, then discarded.

Standard: 29 CFR 191 0.146 Permit-required confined space

(a) Scope and application. This section contains requirements for practices and procedures to protect employees in general from the hazards of entry into permit-required confined spaces. (c) General requirements. (1) The employer shall evaluate the workplace to determine if any spaces are permit-required confined spaces. (2) If the workplace contains permit spaces, the employer shall inform exposed employees, by posting danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit spaces.

Note: A sign reading “DANGER—PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER” or using other similar language would satisfy the requirement for a sign.

(3) If the employer decides that its employees will not enter permit spaces, the employer shall take effective measures to prevent its employees from entering the permit spaces and shall comply with paragraphs (c)(1), (c)(2), (c)(6), and (c)(8) of this section.

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*(4) If the employer decides that its employees will enter permit spaces, the employer shall develop and implement a written permit space program that complies with this section. The written program shall be available **for** inspection by employees and their authorized representatives.*

(d) Permit – required confined space program (space permit program). Under the permit space program require by paragraph (c)(4) of this section, the employer shall: (1) Implement the measures necessary to prevent unauthorized entry; (2) identify and evaluate the hazards of permit spaces before employees enter them; (3) Develop and implement the means, procedures, and practices necessary for safe permit space entry operations, including, but not limited to, the following: (i) Specifying acceptable entry conditions; (ii) Providing each authorized entrant or that employee’s authorized representative with the opportunity to observe any monitoring or testing of permit spaces; (iii) Isolating the permit space; (iv)

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**PERMIT-REQUIRED CONFINED
SPACE ENTRY**

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CONFINED SPACE ENTRY PERMIT

Department _____ Location _____

Confined space to be entered (describe) _____

Reason/purpose for entering confined space _____

Date of entry _____ Duration (in hours) _____

Name(s) of entrant(s) _____

Name(s) of attendant(s) _____

Hazards present in confined space (list) _____

Hazards related to work performed (list) _____

Condition/status of confined space (Yes/No/NA): Shut down _____ Isolated _____
Pressure bled off _____ Liquids drained _____ Energy sources locked/tagged _____

Initial test results:

O₂ level (<19.5%) _____ Combustible gas/vapor (<10% LFL) _____ Toxic gas/vapor (>PEL) _____

Rescue/emergency services available (describe) _____

Communications equipment operational/ready to use (Yes/No/NA) _____

Rescue/Fire/PPE in good condition/ready to use (Yes/No/NA) _____

Entry supervisor verifies all entry conditions are acceptable/authorizes entrance:

Entry Supervisor (name) _____ Signature _____

Periodic testing (at least every 30 minutes):

O ₂ results		Combustible gas/vapor results		Toxic gas/vapor results	
Time _____	Readings _____	Time _____	Readings _____	Time _____	Readings _____
Time _____	Readings _____	Time _____	Readings _____	Time _____	Readings _____
Time _____	Readings _____	Time _____	Readings _____	Time _____	Readings _____
Time _____	Readings _____	Time _____	Readings _____	Time _____	Readings _____
Time _____	Readings _____	Time _____	Readings _____	Time _____	Readings _____
Time _____	Readings _____	Time _____	Readings _____	Time _____	Readings _____
Time _____	Readings _____	Time _____	Readings _____	Time _____	Readings _____

Comments: _____

Kent Materials	Policies and Procedures	Issue 8-20-03
	CONTRABAND	Rev. date 4/19/2011

Note: This Entry Permit is an example of what an entry permit must contain to be in compliance with the standard.

Purpose

The Contraband Policy and Procedure provides Kent Materials with a means to ensure that employees and owner-operators understand and comply with the Company's policy that prohibits the unauthorized use and possession of firearms, explosives and weapons.

Policy

It is the policy of Kent Materials that employees and owner-operators do not possess and/or use unauthorized firearms, explosives and weapons while on Company property or customer premises, or while in vehicles on Company property or customer premises.

Procedure

Kent Materials Management (the owners and employees specifically identified by the owners as "management") has the discretion to distinguish between what is contraband and what is authorized to be in the possession of its employees and owner-operators, and communicates this information to them annually. Management accomplishes or has the authority to accomplish the following:

1. Management conducts searches in company vehicles, in owner-operator vehicles, in Company buildings and structures, and on Company property, at any time and at any location, without notice to employees or owner-operators.
2. If contraband is found, Management takes whatever administrative and disciplinary action it feels is appropriate for the level of offense committed relating to the contraband, up to and including dismissal.
3. Management properly documents the incident on an Incident Report and files the report in the employee's or owner-operator's personnel file.

Searches are conducted on vehicles and any items found in the vehicles, in buildings and in any location or area or piece of furniture inside the buildings, on Company property and in any area or location on Company property, and in other locations or areas in which Kent Materials feels contraband may be found.

Kent Materials	Policies and Procedures	Issue 2-27-04
	CRANE SAFETY	Rev. date 4/19/2011

General Rules

1. Only qualified operators will be allowed to operate cranes and related equipment
2. The equipment shall be operated and maintained within the manufacturer's recommendations.
3. Hand signals to the operator, where necessary.
4. Only one person who is qualified will be designated to give signals to the operator.
5. The operator shall inspect the equipment at the start of each days work.
6. The person in charge of making a lift shall also inspect the rigging, cables, blocks, hooks, etc.
7. No person shall act as a counter weight on hoisting equipment
8. The swing radius of the rotating super structure of a crane shall be barricaded to prevent a person from being struck or crushed by the crane.
9. No person shall be allowed to ride the hook or load.
10. No one shall be allowed under a hoisted load.
11. Always have a tag line on the load.
12. Never guide cables on drums with hands or feet
13. Do not put side loads on crane booms.
14. A fire extinguisher shall be available near the crane.
15. No modifications are permitted on cranes without approval of the manufacturer.
16. Equipment should be firmly supported on solid ground.
17. Lifting and loading capacities should be followed.
18. Lifting capacities should be posted on equipment

Inspections

Daily visual inspections of cranes are requirements of OSHA before using and operating any crane. The following items shall be inspected:

1. Brake system
2. Limit indicators
3. Mechanical and electrical apparatus
4. Hooks, safety latches, wire rope and pendant box
5. Chains, slings and other types of equipment used in hoisting operations.
6. All parts which can be deformed, cracked, corroded, worn or loose members or parts.
7. Any parts that are making peculiar noises, jerking abnormally or traveling improperly.
8. To make sure it is in good operating condition. This includes jib, hooks, blocks, cables, service brakes, and connections, parking system (hand brake), emergency stopping system (brake), tires, horn, steering mechanism, coupling devices, seat belts, operating controls, lights, reflectors, windshield wipers, fire extinguishers and safety devices.
9. If defects are found, remove the crane from service by placing Do Not Use' tag on the equipment and reporting it to a Supervisor.

Monthly inspections shall be completed by the Manager of Shop Maintenance or his authorized personnel

RIGGING

General

Hooks, shackles, beam clamps, and chokers:

1. Only one eye in a hook. Use a shackle to hold two or more eyes.
2. All hooks must have a safety latch or be moused.
3. Always place a load in the center of a hook - never on the point
4. Never rig from any structural member until you are sure it will support the load being raised.
5. Never use plate grips, tongs, pipe clamps, etc., as substitutes for beam clamps.
6. Hooks, shackles and beam clamps should be inspected visually before use. Make sure that the capacity is marked on the equipment.

Kent Materials	Policies and Procedures	Issue 2-27-04
	CRANE SAFETY	Rev. date 4/19/2011

1. A chain hoist must be used within its rated capacity. Chain hoists are designed so that one person can operate the hand chain to lift the maximum Toad for the chain hoist
2. Do not leave an unsecured and unattended load hanging on a hoist or a chain hoist
3. Do not wrap the load chain around the load to be lifted.
4. Evens' chain hoist should be inspected visually before making a lift your visual check should include:
 - A. Hooks for any irregularities.
 - B. Chains for wear of damage.
 - C. Housing and sheaves for any signs of damage from abusive treatment
5. Use softeners, where possible, to obtain a "bite" on material being rigged.
6. A minimum of 3 wire rope clips shall be used when forming loop eye splices or lapped splices. As rope diameter increases, the number of clips and spacing requirements increase.

The following general rules shall be enforced whenever a sling, wire rope, synthetic rope, webbing or others rigging equipment is used.

1. Rigging equipment for material handling, including but not limited to, slings, fastenings and attachments shall be inspected by a competent person prior to use on each shift and as necessary during use. Any defective rigging equipment shall be immediately removed from service. Additional inspections may be needed depending upon use and service conditions.
2. Rigging equipment shall not be loaded in excess of its safe working load, — -
3. Rigging equipment, when not in use, shall be removed from the immediate work area so as not to present a hazard.
4. Special custom design grabs, hooks, clamps or other lifting devices shall be marked to indicate their safe working loads and shall be proof tested prior to use to 125 percent of their rated load.
5. Job or shop hooks and links, makeshift fasteners (formed from bolts, rods, etc.) or other such attachments shall not be used.

Alloy Steel Chain:

1. Welded alloy steel chain slings shall have permanently affixed durable identification stating size, grade, rated capacity and sling manufacturer.
2. Rated capacity for alloy steel chain slings shall conform to the values
3. Whenever wear at any point of any chain link exceeds the value shown in Table the assembly shall be immediately removed from service.
4. In addition to the inspections discussed above, a thorough periodic inspection of all alloy steel chains in use shall be made on a regular basis. The basis for the inspection shall be determined by the frequency of use, severity of service conditions, nature of lifts being made and experience gained on the service life of slings used in similar conditions. Such inspection intervals shall be no longer than once every 12 months.
5. The employer shall make and maintain a record of the most recent month in which each alloy steel chain was inspected and such record shall be available for examination.

Wire Rope:

1. Tables H-3 through H-14 shall be used to determine the safe working loads for wire rope and wire rope slings. For sizes, classifications and grades not listed in these tables, the safe working load recommended by the manufacturer shall be followed. A safety factor of not less than five (5) shall be maintained.
2. Protruding ends of strands in splices on slings and bridles shall be covered or blunted.
3. Wire ropes shall not be secured by knots, except on haul back lines on scrapers.
4. The following limitations shall apply to the use of wire rope:

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- A. An eye splice made in any wire rope shall not have less than three full tucks
- B. Except for eye splices in the ends of wires and for endless rope slings, each wire rope used in hoisting, lowering or in pulling Toads, shall consist of one continuous piece without a knot or splice.
- C. Eyes in wire rope bridles, slings or bull wires shall not be formed by wire rope clips or knots.
- D. Wire rope shall not be used if, in any length of eight (8) diameters, the total visible broken wires exceed 10 percent of the total number of wires, or if the rope shows other signs of excessive wear, corrosion or defect
- 5. Table H-20 shall be used to determine the number and spacing of clips. When used for eye splices, the U-bolt shall be applied so that the "U" section is in contact with the dead end of the rope.
- 6. Slings shall not be shortened with knots, bolts or other makeshift devices.
- 7. Sling legs shall not be kinked.
- 8. Slings shall be padded or protected from sharp edges of their Toads.
- 9. Hands or fingers shall not be placed between the sling and its load while the sling is being tightened around the Toad.
- 10. Shock loading is prohibited.
- 11. A sling shall not be pulled from under a load while the load is resting on the sling.

Natural Rope and Synthetic Fiber

- 1. Tables H-15, 16, 17 and 18 apply to all natural rope and synthetic fiber slings.
- 2. All splices in rope slings shall be done in accordance with the manufacturer's recommendations.
- 3. In manila rope, eye splices shall contain at least three (3) full tucks and short splices shall contain at least six (6) full tucks (three on each side of the centerline of the splice).
- 4. Inlaid synthetic fiber rope, eye splices shall contain at least four (4) full tucks and short splices shall contain at least eight (8) full tucks (four on each side of the centerline of the splice).
- 5. Strand end tails shall not be trimmed short (flush with the surface of the rope) immediately adjacent to the full tucks. This precaution applies to both eye and short splices and all types of fiber rope. For fiber ropes under one (1)-inch diameter, the tail shall project at least six (6) rope diameters beyond the last full tuck. Where a projecting tail interferes with the use of a sling, the tail shall be tapered and spliced into the body of the rope using at least two (2) additional tucks (which will require a tail length of approximately six (6) rope diameters beyond the last full tuck).
- 6. For fiber ropes one (1) inch and larger, the tails shall project at least six (6) inches beyond the last full tuck.
- 7. For all eye splices, the eye shall be of such size to provide an included angle of not greater than 60 degrees at the splice when the eye is placed over the load or support.
- 8. Fiber rope slings shall have a minimum clear length of rope between eye splices equal to ten (10) times the rope diameter.
- 9. Knots shall not be used in lieu of splices.
- 10. Clamps not designed specifically for fiber ropes shall not be used for splicing
- 11. Natural and synthetic fiber rope slings, except for wet frozen slings, may be used in a temperature range from minus 20 degrees to plus 180 degrees F without decreasing the working load *limit* For temperatures outside of this range and for wet frozen slings, follow the sling manufacturers recommendations.
- 12. Fiber rope slings shall not be used if the end attachments in contact with the rope have sharp edges or projections.
- 13. Natural and synthetic fiber rope slings shall be immediately removed from service if any of the following conditions are present:
 - A. Abnormal wear.
 - B. Powdered fiber between strands.
 - C. Broken or cut fibers.
 - D. Variations in the size or roundness of strands.

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- E. Discoloration or rotting.
- F. Distortion of hardware in the sling.

Synthetic webbing (nylon, polyester and polypropylene):

1. Each synthetic web sling shall be marked or coded to show.
 - A. Name or trademark of manufacturer.
 - B. Rated capacities for the type of hitch.
 - C. Type of Material.
2. Rated capacity shall not be exceeded.
3. Synthetic webbing shall be of uniform thickness and width and selvage edges shall not be split from the webbing's width.
4. Fittings shall be:
 - A. Of a minimal breaking strength equal to that of the sling.
 - B. Free from all sharp objects.
5. Stitching shall be the only methods used to attach end fittings to webbing and to form eyes. The thread shall be in an in pattern and contain a sufficient number of stitches to develop the full breaking strength of the sling.
6. When synthetic web slings are used, the following precautions shall be taken:
 - A. Nylon web slings shall not be used where fumes, vapors, sprays, mists or liquids of acids or phenolics are present
 - B. Polyester and polypropylene web slings shall not be used where fumes, vapors, sprays, mists or liquids of caustics are present
 - C. Web slings with aluminum fittings shall not be used where fumes, vapors, sprays, mists or liquids of caustics are present
7. Synthetic web slings of polyester and nylon shall not be used where the temperature is in excess of 180 degrees F. Polypropylene web slings of polyester and nylon shall not be used where the temperature is in excess of 200 degrees F.
8. Synthetic web slings shall be immediately removed from service if any of the following conditions are present
 - A. Acid or caustic burns.
 - B. Melting or charring of any part of the sling surface.
 - C. Snags, punctures, tears or cuts.
 - D. Broken or worn stitches.
 - E. Distortion of fittings.
9. Table H-IS shall be used to determine the safe working loads of the various sizes of shackles, except that higher safe working loads are permissible when recommended by the manufacturer for specific, identifiable products, provided that a safety factor of not less than five (5) is maintained.

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manufacturer's recommendation shall be followed in determining the safe working loads of the various sizes and types of specific and identifiable hooks. All hooks for which no applicable manufacturer's recommendations are available shall be tested to twice the intended safe working load before they are initially put to use. The Manager of Shop Maintenance shall maintain a record of the test dates and results of such tests.

Purpose

The Customer Field Policy and Procedure provides Kent Materials with a means to ensure that our employees and owner-operators understand and comply with the customer's health and safety requirements while they are working at the customer's field locations.

Policy

It is the policy of Kent Materials that our employees and owner-operators follow the customer's health and safety plans, programs, policies and procedures while working at the customer's field locations.

Procedure

It is the responsibility of each Kent Materials employee and owner-operators to become familiar with the customer's plans, programs, policies and procedures as they pertain to their work activities:

1. Fill in the header information at the top of the attached *Customer Field Report* form; complete one *Report* form for each customer you service.
2. Review the *Report* form to become familiar with the list of plans, programs, policies and procedures you are likely to find in the customer's field location(s).
3. Select one item in the list and write in the date and the customer representative's name, and then ask the following questions of the customer representative at the customer location:
 - Do you have a (an) _____ in place at this location? (Examples: *Orientation or Exposure Control Plan or Fall Protection Plan*)
 - o If an incident occurs regarding the _____ will I be expected to do anything? *or*
 - o Should I be familiar with the _____
 - (If the answer is "yes") What am I expected to do?
3. If there is an expectation, record what you should know or what role and/or responsibility you will have if an incident occurs. If there is no expectation, put "NA" or "None".
5. If the customer does not have the item, record the date, the representative's name and

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ds “does not have item in place” on the *Report*.

6. If the customer has a plan, program, policy or procedure in place that is not listed on the form, add it to the list and repeat steps #3 and #4, for each item added.
7. Repeat the process until all of the items required at this customer’s location are reviewed and all of your roles and responsibilities are determined (or no participation is expected).
8. When the entire list of items has been reviewed, make a copy of the *Report* and bring it to the Port Allen office or mail it to the office 1555 Beaulieu Lane, Port Allen, LA 70756.
9. If an incident occurs while you are working at the customer’s location, complete your role and/or responsibility regarding the incident, ensuring that you remain safe and healthy during the process, then contact the office and report the incident.
10. If an incident occurs and the customer has no program or procedure in place, follow your Kent Materials policy and procedure, then contact the office and report the incident.

Employees and owner-operators are now in a position to help protect themselves from the health and physical hazards associated with an incident.

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KENT MATERIALS CUSTOMER FIELD REPORT

Employee/Contract Person's Name Customer Name(s)			
Customer Location(s)			
Plan, Program, Policy, Procedure	Date	Customer Representative	Expectations / Roles and Responsibilities
Orientation			
Exposure Control Plan (Bloodborne Pathogens)			
Drug/Alcohol Abuse Plan			
Firearms / Explosives / Weapons Policy			
Emergency Response Plan (spill)			
Incident Reporting / Investigating_Procedure			
Respiratory Protection Program			
Hearing Conservation Program			
Hazard Communication Program			
Hydrogen Sulfide (H2S) Program			
Fall Protection Plan			
HM 232 Security Plan			
Other:			
Other:			

COMMENTS:

Kent Materials	Policies and Procedures	Issue 9-17-03
	DEFENSIVE DRIVING	Rev. date 4/18/2011

Purpose

The Defensive Driving Policy and Procedure provides the Company with a means to ensure that our employees and owner-operators drive defensively to prevent injuries and property damage and save lives when driving company, personal and rental/leased vehicles while working for Kent Materials.

Policy

It is the policy of Kent Materials to ensure that our employees and owner-operators drive safely, drive defensively, and prevent and avoid incidents involving vehicles.

Procedure

Kent Materials has adapted the philosophy that defensive driving means driving safely, in spite of the driving conditions and in spite of the actions of others. Driving defensively also means wearing safety belts while riding in the vehicle, as a driver or as a passenger, to minimize the chances of injury if an incident occurs.

1. Attend Defensive Driving Training, if by third party, send a copy of the certificate and a copy of the paid receipt to the KM office in Port Allen, Attention: HSE Manager.
2. Plan and organize each and every driving trip:
 - Determine and prepare for the route you will take and the weather conditions expected along the route.
 - Think through the trip to make sure you are prepared for every contingency.
 - Make sure you are well-rested for the trip you will take.
 - Make sure you have not had any alcohol within the previous eight hours.
 - Make sure that you are not taking any medications that may impair your ability to drive.
3. Prior to getting into the vehicle:
 - Be satisfied that the vehicle is in safe operating condition and load is secure.

For DOT Drivers only:

 - Review the last driver vehicle inspection report (49 CFR 396); and
 - Sign the report, only if defects or deficiencies were noted by the driver who prepared the report, to acknowledge that the driver has reviewed it and that there is a certification that the required repairs have been performed.

Note: The signature requirement does not apply to listed defects on a towed unit which is not longer part of the vehicle combination.

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4. After starting the engine:

- Notice the overall running condition of the vehicle.
- Check the engine temperature.
- Check the lights.
- Check/adjust the mirrors and seat.
- Fasten your seat belts and insist that your passenger(s) does (do) likewise.
- Check around the vehicle to make sure nothing is under it or behind it.
- Check around the vehicle to make sure there are no oncoming vehicles.
- Prepare to drive defensively.

5. When driving the vehicle:

- Obey all posted speed limits and all other posted traffic signs.
- Don't dial or talk on a cell phone; pull the vehicle over.
- Don't drive and drink.
- Don't drive if you are tired; pull over and rest.
- Don't drive when you are angry, worried or frustrated, or become angry or frustrated.
- Don't drive when your mind is not on your driving.
- Don't drive if the road conditions are unfavorable.
- Don't drive if the weather conditions are too adverse.
- Don't drive with bright lights while facing on-coming vehicles or following vehicles.
- Don't run caution or red lights or stop signs.
- Don't pass another vehicle unless safe and in a passing zone.
- Don't weave in and out of your lane.
- Always signal when changing lanes or turning.
- Always be aware of the other drivers/vehicles.
- Always drive on your side of the roadway.
- Always maintain a safe distance between your vehicle and other vehicles (one car length for every ten miles of speed; double the distance in bad weather).
- Always yield the right-of-way.
- Always treat an out-of-service traffic light as a four-way stop.
- Always be prepared to take defensive actions to avoid a collision or to avoid running into someone or something.
- Always focus on your job of driving defensively.

6. After driving the vehicle (DOT Drivers only):

- Complete driver vehicle inspection report(s) (49 CFR 396).

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7. If an incident occurs, notify your Manager immediately, and the Safety Management Systems HSE Manager, in person or by telephone:

- Steve Kent Office 225-930-4512; Cell 225-937-0434;
- Gerard Smith Office 225-930-4512; Cell 225-278-6984;
- Brad Antie Office 225-930-4512; Cell 225-235-0711;
- Safety Manager Office 225-930-4512

If you cannot notify your Manager, notify one of the other KM Managers. Within 24 hours of the incident, the HSE Manager completes an Incident Report according to the Incident Reporting Policy and Procedure. All incidents are investigated by an SMS Investigating Team.

Note: Incident Reports are available at the Port Allen office (225-930-4512) or any Kent Materials Location.

Kent Materials	Policies and Procedures	Issue 9-22-03
	DISCIPLINARY POLICY	Rev. date 4/18/2011

Purpose

The Disciplinary Policy and Procedure provides Kent Materials (KM) with a means to ensure that our employees and owner-operators comply with all of the Health, Safety and Environmental Plans, Permits, Programs, Policies and Procedures, and to provide a consistent method of discipline for employees who choose not to comply.

Policy

It is the policy of KM to provide equal and fair treatment to all employees and owner-operators through a method of discipline and counseling, which ensures that unsafe behaviors are addressed and corrective actions are taken in a consistent manner.

Procedures

The Kent Materials Disciplinary Policy and Procedure applies to any and all employees and owner-operators. KM has the exclusive right to administer appropriate disciplinary action, including termination, to offending employees and owner-operators for proper cause. The following four-step discipline method is used whenever an KM or customer safety, health or environmental plan, permit, program, policy or procedure is not complied with, or whenever an unsafe behavior is observed, according to the following standards:

1. **Verbal warning-** Respective manager gives the employee a verbal warning, which includes the reason for the warning, and verbally suggests corrective action. For example,
 - reporting late for work or excessive tardiness, or
 - excessive absenteeism, etc.
2. **Written warning-** Respective manager provides the employee with a second written, warning on the same issue (or similar issue) and includes the reason for the written warning and written corrective actions to be taken. For example,
 - Failure to immediately report any safety or environmental incidents, or
 - fighting, horseplay, or other disruptive activities on company or customer premises or while on duty, etc.
3. **Discretionary-** Management reserves the right to impose discretionary disciplinary action, and may chose as the discipline day(s) away from work without pay, demotion, temporary job duty reassignment, etc. All forms of discretionary discipline may include counseling and/or re-training with a clear goal in mind of favorably modifying the employee's future behavior. For example,
 - Misrepresentation or the fraudulent action relative to company documents,
 - disregard of KM's or customer's Safety, Health and Environmental Plans, Permits, Programs, Policies and Procedures, etc.

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4. Termination- Owner(s) terminate(s) the employee. Louisiana is an “at will” work state and employees work at the discretion of the employer. For Example,

- Improper operation of DOT vehicles; speeding, not using turn signals, etc., or
- theft, misappropriation, or deliberate damage of property of employees, the company or customers, etc.

If the employee is terminated, office personnel prepare the necessary termination documents and obtain the employee’s signature, then place the documents in the employee’s personnel file.

Note: Similar disciplinary actions can be taken for administrative or legal violations by employees and owner-operators.

Kent Materials	Policies and Procedures	Issue 9-22-03
	DUMP TRUCK & TRAILER POLICY	Rev. date 4/18/2011

ALL TRUCKS AND TRAILERS USE A HYDRAULIC HOIST TO DUMP THEIR LOADS. THESE SAME VEHICLES AND TRAILERS MAY ALSO BE USED TO TRANSPORT AND DUMP SAND, GRAVEL, FIREWOOD, DEBRIS OR OTHER SIMILAR MATERIALS. THIS FACT SHEET WILL EXAMINE LARGE DUMP TRUCK AND TRAILER SAFETY ISSUES RELATING TO THE USE OF THESE UNITS.

WHAT HAPPENS?

THE SITUATIONS PRESENT THE MOST POTENTIAL FOR A FATAL INJURY INVOLVING THE USE OF LARGE DUMP TRUCKS AND TRAILERS. ONE SITUATION INVOLVES TRUCKS AND/TRAILERS TIPPING OVER WHILE EMPTYING LOADS. THIS CAN HAPPEN FOR A VARIETY OF REASONS. A SECONDSITUATION IS WHEN A PERSON WORKS UNDER A RAISED TRUCK OR TRAILER BED. USUALLY THE PERSON HAS NOT PHYSICALLY BLOCKED THE BED FROM COMING DOWN UNEXPECTEDLY. THE THIRD SCENARIO IS WHEN THE TRUCK OR TRAILER BED COMES INTO CONTACT WITH OVERHEAD ELECTRICAL LINEWS AND THE DRIVER OR AN ON GROUND PERSON IS ELECTROCUTED. THIS USUALLY HAPPENS WHEN A DRIVER PULLS AWAY AFTER EMPTYING THE LOAD WITHOUT LOWERING THE BED. IN ALL THREE SCENARIOS, A PERSON CAN BE CRUSHED TO DEATH OR ELECTROCUTED WITHIN SECONDS.

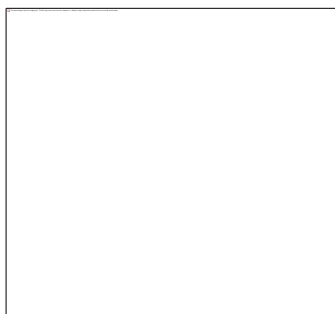


FIGURE 1: RAISED BEDS OF LARGE DUMP TRUCK AND TRAILERS PRESENT SEVERAL POSSIBLE HAZARDS.

RAISED DUMP BED HAZARDS:

RAISING THE BED OF DUMP TRUCKS AND TRAILERS MAY EXPOSE WORKERS TO POTENTIAL HAZARSOUS CONDITIONS. ALL OF THESE POTENTIALLY HAZARDOUS CONDITIONS CAN BE CONTROLLED OR ELIMINATED BY APPLYING KNOWN SOLUTIONS BEFORE, DURING AND AFTER DIMPING LOADS. IDENTIFIED BELOW ARE SEVERAL POTENTIAL HAZARDOUS CONDITIONS RELATING TO RAISED DUMP BEDS AND HOW THESE CONDITIONS MAY BE CONTROLLED OR ELIMINATED.

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INSTABILITY: A DUMP TRUCK OR TRAILER BECOMES LESS STABLE AS ITS BED IS RAISED, PARTICULARLY WHEN THE GROUND IS LESS THAN PERFECTLY FLAT. THE

GREATER THE LENGTH OF THE TRUCK OR TRAILER BED, OR THE GREATER A SLOPE, THE GREATER IS THE HAZARD OF TIP OVER. AS THE BED IS RAISED, IT IS IMPORTANT THAT THE LOAD CENTER OF GRAVITY STAY BETWEEN THE FRAME RAILS OF THE BED, PREFERABLY RIGHT IN THE CENTER. EVEN WHEN THE GROUND IS RELATIVELY FLAT, SLIGHT SLOPE CAN BE CREATED BY ONE SET OF TIRES SETTING IN A HOLE OR DEEP SET OF RUTS, LOW TIRE PRESSURE ON ONE SIDE, OR A GROUND DEPRESSION THAT IS CREATED ON ONE SIDE AS ON OFF-CENTER LOAD IS UNLOADED ON SOFT GROUND. OFTEN IT'S A COMBINATION OF THESE CONDITIONS THAT RESULT IN INSTABILITY AND A TIP OVER. FIGURE 2 SHOWS THE TIP OVER HAZARD FROM RAISED BEDS ON SLOPED GROUND. A LONGER BED PRESENTS A GREATER RISK OF TIP OVER THAN A SHORTER BED.



Figure 2: Raising a bed on sloped ground increases the tip over hazard. A longer trailer increases this risk.

WIND, OFF-CENTER LOADS AND JACK-KNIFED TRAILERS ADD TO INSTABILITY HAZARDS. LONGER TRAILERS PROVIDE MORE SURFACE AREA FOR HIGH WINDS TO CREATE LATERAL PRESSURE ON THE TRAILER INCREASING THE CHANCE OF A TIP OVER. JACK-KNIFED RIGS OFTEN LEAVE THE CAB IN A POSITION TO BE CRUSHED

IF THE TRAILER DOES TIP. THIS HAZARD IS INCREASED IF THE GROUND IS UNEVEN, THERE IS HIGH WIND, AND/OR THE LOAD IS NOT CENTERED OR SHIFTS OFF-CENTER WHILE BEING UNLOADED. OFF-CENTER AND SHIFTING LOADS CAN OCCUR FOR A VARIETY OF REASONS INCLUDING THE LOAD NOT DISTRIBUTED PROPERLY WHEN IT WAS LOADED (E.G., TOP-HEAVY OR TOO MUCH ON ONE SIDE), MATERIAL NOT FLOWING EVENLY OUT OF THE BED (E.G., WET OR FROZEN MATERIAL MAY STICK TO A SIDE), OR AGAIN, IF THE GROUND IS UNEVEN OR TIRES ARE LOW ON ONE SIDE.

UNEXPECTED BED LOWERING: WORKERS CAN BE CRUSHED TO DEATH ALMOST INSTANTLY BY DUMP BEDS THAT COME DOWN UNEXPECTEDLY, EITHER FROM AN INADVERTED LOWERING OF THE BED, FAILURE OF BED LIFT COMPONENTS

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(E.G.,PINS,BUSHINGS), OR THE COLLAPSE OF THE HOIST CYLINDER. A WORKER MOST OFTEN PLACES HIM OR HERSELF BETWEEN A RAISED DUMP BED AND THE TRUCK OR

TRAILER FRAME TO CHECK ON UNEXPECTED NOISES OR POSSIBLE MALIFUNCTIONS, AND TO PREFORM ROUTINE MAINTENANCE (E.G., GREASING) AND REPAIRS. A BED CAN BE LOWERED INADVERTENTLY BY CO-WORKER OR BY A WORKER INADVERTENTLY TRIOPPING A REMOTE CONTROL LEVER. BEL LIFT COMPONETS, SUCH AS HINGE PINS,

BUSHINGS AND STRUCTURAL ARMS, ARE MOST LIKELY TO FAIL WHEN UNDER PRESSURE FROM A RAISED BED, ESPECIALLY IF THERE IS A LOAD IN THE BED.

HYDRAULIC HOISTS MAY LOWER SUDDENLY FROM THE CYLINDER(S) LOSING PRESSURE. THIS MAY HAPPEN WHEN CYLINDER COMPONENTS (HOSE, VALVES, AND RINGS) FAIL OR LEAK FROM WEARS OR TOO MUCH PRESSURE. TOO MUCH PRESSURE CAN OCCUR IF AN ORIGINAL LIFTS CYLINDER SYSTEM HAS BEEN REPAIRED OR REPLACED WITH A SMALLER SYSTEM, OR IF THE TRUCK OR TRAILER BED IS EITHER SIGNIFICANTLY OR CONSTANTLY OVERLOADED. TRUCK AND TRAILER BEDS SHOULD BE OUTFITTED WITH A LIFT ARM SUPPORT THAT CAN MECHANICALLY BLOCKTH BED FROM COMING DOWN.

FIGURE 3

Lift arm support

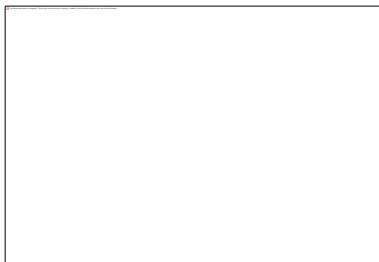


Figure 3: Always engage the lift arm support before placing yourself beneath a raised bed.

CONTACT WITH OVERHEAD WIRES: OVERHEAD POWER LINES ARE ALWAYS A HAZARD. CONTACT BETWEEN OVERHEAD LINES HAS THE POSSIBILITY OF ELECTROCUTION EXISTS WITH RAISED TRUCK AND TRAILER BEDS. CONTACT BETWEEN A RAISED DUMP BED AND A POWER LINE IS MOST LIKELY TO OCCUR WHEN THE TRUCK IS PULLED FORWARD WITH THE DUMP BED STILL RAISED. THIS MAY HAPPEN BECAUSE OF FORGETFULNESS BY THE DRIVER BUT IS MORE LIKELY TO HAPPEN BECAUSE OF HASTE OR IMPATIENCE: THE DRIVER DOESN'T WANT TO WAIT FOR TLHE BED TO COMPLETELY LOWER BEFORE PULLING AWAY.

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IN SUCH CASES, THE DRIVER IS NORMALLY PROTECTED FROM ELECTROCUTION BECAUSE HE OR SHE IS INSULATED FROM THE ELECTRICAL CHARGE BY THE TRUCK TIRES. ONLY IF THE DRIVER LEAVES THE CAB AND IS SIMULTANEOUSLY IN CONTACT WITH THE GROUND AND THE TRUCK WILL BE ELECTROCUTED. IF A PERSON, FOR EXAMPLE A HELPER, IS ON THE GROUND TOUCHING ANY PART OF THE TRUCK OR TRAILER WHEN CONTACT WITH AN OVERHEAD POWER LINE IS MADE, THE PERSON MAY BE ELECTROCUTED INSTANTLY. ADDITIONAL HAZARDS THERE ARE A NUMBER OF ADDITIONAL HAZARDS ASSOCIATED WITH USING LARGE DUMP TRUCKS AND TRAILERS THAT MAY OR MAY NOT INVOLVE A DUMP BED IN A RAISED POSITION. FOR INSTANCE, SLIPS AND FALLS MAY OCCUR WHEN CLIMBING ON AND OFF TRAILER BEDS. CRUSHED FINGERS AND HANDS MAY RESULT FROM OPENING AND CLOSING THE LATCHES OF TAILGATES, OR FROM TAILGATE HINGES.

HELPERS MAY BE CRUSHED BETWEEN A TRAILER DUMP BED AND A BUILDING OR OTHER STRUCTURE, OR EVEN RUNOVER, WHILE HELPING A DRIVER BACK INTO A TIGHT OR CLOSE-QUARTERS UNLOADING LOCATION. ADDITIONALLY THERE IS ANOTHER HAZARD INVOLVING STABILIZERS TO BE IDENTIFIED.

COLLAPSING LANE SHOULDERS AND DITCH BANKS: LARGE DUMP TRUCKS AND TRAILERS CAN EXERT CONSIDERABLE PRESSURE ON THE BANKS OF DITCHES AND SHOULDERS. FOR EXAMPLE, A 28 FOOT SEMI-TRAILER END-DUMP TRUCK WITH A LEGAL ROAD TRAVEL GROSS VEHICLE WEIGHT (GVW) OF ABOUT 76,000LBS. (38 TONS). IF SOIL IS WEAKENED FROM FREEZING AND THAWING (HEAVING), OR PROLONGED WET WEATHER, AND THE TRUCK IS DRIVEN ON THE SHOULDER OR TOO CLOSE TO THE DITCH, THE WEIGHT MAY BE ENOUGH TO COLLAPSE THE SOIL RESULTING IN A TIP OVER. THIS SAME HAZARD, USUALLY REFERRED TO AS THE SHEAR LINE HAZARD. FIGURE 4 IDENTIFIES THE SHEAR LINE OF A SIX FOOT DITCH BANK.

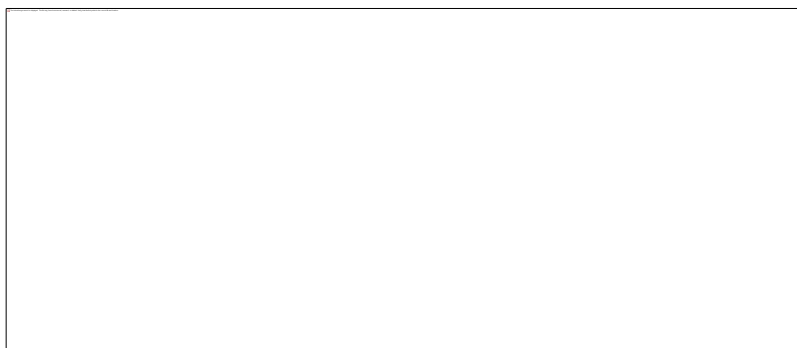


Figure 4: The shear line distance is typically equal to the height of the drop off.

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CONTROLLING AND ELIMINATING HAZARDS:

THERE ARE MANY DIFFERENT WAYS TO DECREASE THE HAZARDS ASSOCIATED WITH USING LARGE DUMP TRUCKS AND TRAILERS. THESE INCLUDE DESIGN FEATURES OF THE TRUCK AND TRAILER, ACTIONS ASSOCIATED WITH LOADING AND UNLOADING.

LOADING AND UNLOADING:

- + BE SURE THE LOAD IS EVENLY DISTRIBUTED THROUGHOUT THE DUMP BED.
- + AVOID OVERLOADING THE DUMP BED. KNOW THE WEIGHT LIMITS OF THE VEHICLE AND UNDERSTAND HOW TO CALCULATE THE WEIGHT OF MATERIAL THAT IS BEING LOADED.
- + FOR MATERIALS THAT FLOW OUT OF DUMP BEDS POORLY, LOAD LESS MATERIAL THAN NORMAL AND! OR DISTRIBUTE SLIGHTLY MORE MATERIAL TO THE REAR OF THE BED.
- + UNLOAD ON COMPACTED SOIL OR GRAVEL AND ON AS SMOOTH AND LEVEL A SURFACE AS POSSIBLE.
- + BE SURE THE TAILGATE IS UNLOCKED BEFORE RAISING THE DUMP BED.
- + ALIGN A TRACTOR AND SEMI-TRAILER IN AS STRAIGHT A LINE AS POSSIBLE TO UNLOAD. AVOID SHARPLY JACKKNIFED ALIGNMENTS.
- + IF NECESSARY, REARRANGE OR CLEAR AREAS TO PROVIDE EASY ACCESS TO UNLOADING AREAS AND TO PROVIDE OVERHEAD AND DUMPING AREA CLEARANCE.
- + THE DUMPING AREA SHOULD BE CLEAR OF OTHER VEHICLES AND PEOPLE DURING UNLOADING.
- (AMPLE LIGHTING SHOULD BE PROVIDED FOR NIGHT TIME OPERATIONS.
- + **LOWER THE BED COMPLETELY BEFORE MOVING THE TRUCK AFTER UNLOADING. IF EQUIPPED WITH AN INDICATION LIGHT, MAKE SURE LIGHT IS OFF AND VERIFY THE BED IS DOWN BY CHECKING ITS POSITION IN YOUR MIRRORS.**

DRIVER TRAINING:

- + DRIVERS ARE RESPONSIBLE FOR THE INSPECTIONS OF TRUCK AND TRAILERS.
- + DRIVERS NEED TO RECOGNIZE HAZARDOUS CONDITIONS SUCH AS IMPROPER LOAD DISTRIBUTION, DITCH BANK SHEAR LINES, FROZEN OR WET MATERIALS, POORLY FLOWING MATERIALS, UNEVEN UNLOADING SURFACES, ETC
- + DRIVERS AND HELPERS WILL KNOW HOW TO USE HAND SIGNALS AND SAFE PROCEDURES FOR TWO PERSON UNLOADING OPERATIONS.

FLAGMEN / SPOTTERS:

FLAGMEN/SPOTTERS SHALL BE PROVIDED AS NEEDED TO ASSIST DUMP TRUCK DRIVERS/OPERATORS IN THE SAFE PLACEMENT AND UNLOADING OF EQUIPMENT. A FLAGMAN/SPOTTER SHALL BE PRESENT AT ALL TIMES FOR ANY


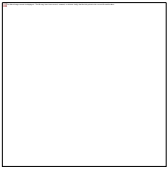

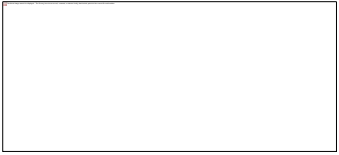




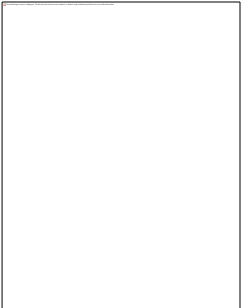
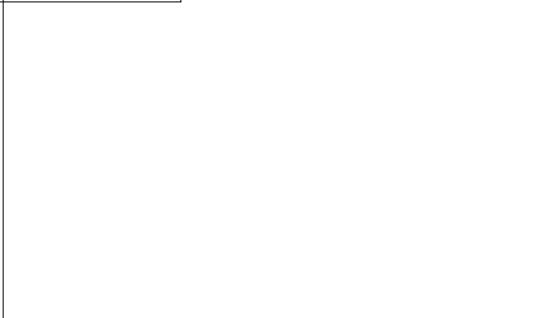
	Policies and Procedures	Issue 9-22-03
	DUMP TRUCK & TRAILER POLICY	Rev. date 4/18/2011

DUMPING OPERATIONS UTILIZING A SEMI-TRAILER END DUMP TRUCK.

PERSONNEL ASSIGNED AS FLAGMEN/SPOTTERS SHALL BE PROPERLY TRAINED AND FAMILIAR WITH PROPER HAND SIGNALING TECHNIQUES AND SAFE

EQUIPMENT OPERATING INSTRUCTIONS. AS A MINIMUM ALL FLAGMEN/SPOTTERS SHALL BE FAMILIAR WITH ALL SAFETY CHECKLIST REQUIREMENTS.

SAMPLE STANDARD HAND SIGNALS:

			
COME TO ME Raise the arm vertically overhead, palm to the front, and rotate in large horizontal circles.	MOVE TOWARD ME Point toward person(s), Vehicles(s), unit(s); beckon by holding the arm horizontally To the front, palm up, and motioning toward the body	THIS FAR TO GO Place palms at ear level facing head, and move laterally inward to indicate remaining distance to go	MOVE OUT Face the desired direction of movement; hold the arm extended to the rear; then swing it overhead and forward in the direction of desired movement until it is horizontal palm down
	LOWER EQUIPMENT Make Circular motion with either hand pointing to the ground		RAISE EQUIPMENT Make circular motion with either hand at head level.
	SLOW DOWN Extend the arm horizontally Sideward, palm down, and wave arm downward 45 degrees minimum several times, keeping the arm straight		START ENGINE Simulate cranking of vehicles by moving arm in circular motion at waist level.
	STOP Raise the hand upward to the full extent of the arm. Palm to the front. Hold that position until the signal is understood. STOP ENGINE Draw either hand. Palm down across the neck in a "throat-cutting motion"		

	Policies and Procedures	Issue 2-27-04
	ELECTRICAL SAFETY	Rev. date 7/29/10

Purpose

The Electrical *Safety* Policy and Procedure provides Kent Materials with a means to ensure that electrical work is conducted safely by unqualified employees using safe work practices.

Policy

It is the policy of Kent Materials (KM) that electrical work is performed safely.

[Web address is www.osha-pov search “1910.333”, click “1910.333 - *Selection and use of work practices*”.]

Procedure

Prior to working on equipment that operates using electricity; employees are required to use a voltage tester to verify that the equipment has been de-energized. Employee completes these steps to determine if the hazardous electrical energy is present:

1. Verify meter works by turning selector knob to OHMS and touching leads together; meter should read infinity.
2. Set voltage selector to 250+ volts if appliance uses 110 or 220 volts or set selector to 500+ volts if appliance uses 440 or 480 volts.
3. If applicable, verify wires to leads are securely in place in voltage tester.
4. Check needle on voltage tester register; verify at “0” on dial.
5. Determine where electricity source and wire to appliance meet at switch in disconnect.
6. Put one voltage tester probe on electrical source and hold in position.
7. Put other voltage tester probe on wire to appliance and look at register: if needle registers 110, 220, 440, or 480, electricity energy source is still present; if needle registers “0”, energy source is disrupted.

Whenever repair, maintenance or close inspections are necessary, first isolate the components of the electrical installation by turning off the main disconnect, checking it to be sure the disconnect has operated correctly, and finally tagging and locking out the installation. Employees follow these steps to de-energized and work on electrical parts.

1. To de-energize equipment to repair equipment, perform maintenance or conduct an inspection:
 - a. Check exterior of disconnect or switch box for damage; if determined unsafe, contact electrician.
 - b. Stand in dry spot away from front of disconnect or switch box and tap metal using back of right hand, to check for electricity; if electrical shock experienced, contact electrician.
 - c. Using the right hand, shut off disconnect or switch in switch box and/or unplug from power source (put in OFF position).
 - d. Use voltage tester to verify the electricity is disrupted between electricity source and

machine or equipment.

e. Turn appliance switch ON to verify it has no electrical energy, then OFF again.

2. Apply locks and/or tags (refer to KM's Lockout/Tagout Policy and Procedure).

3. Place proper electrical danger/warning tag on each disconnected part.

4. Select and use the appropriate safe work practices and equipment when conducting electrical work in the workplace:

- Provide adequate illumination to safely perform work.
- Use protective shields, protective barriers or insulating materials in confined spaces to avoid contact with exposed energized parts.
- Use only nonconductive materials and equipment in conjunction with insulation, guarding, and material handling techniques that minimize electrical hazards in areas with exposed live parts.
- Use portable ladders that have nonconductive siderails (wood or fiberglass).
- Do not wear conductive jewelry and clothing around exposed energized parts unless they are rendered nonconductive by covering, wrapping or other means.
- Do not perform housekeeping duties in close proximity to exposed energized parts where contact is possible; do not use electrically conductive cleaning materials in proximity to energized parts unless procedures are followed to prevent electrical contact (no water hoses).
- Have a qualified person disable electrical safety interlocks temporarily while work is conducted on the equipment; return interlock systems to operable condition when work is completed.
- Use electrical personal protective equipment appropriately on the specific parts of the body to be protected and for the work performed; maintain personal protective equipment in a safe, reliable condition and inspect or test periodically:
 - o Wear nonconductive head protection when there is a danger of head injury for electric shock or burns due to contact with exposed energized parts.
 - o Wear eye or face protective equipment when there is danger of injury from electric arcs, flashes or flying objects resulting from electrical explosion.
 - Use insulated tools/handling equipment near exposed energized conductors or circuits:
 - o Use fuse handling equipment (fuse puller) insulated for the circuit voltage to remove or install fuses when the fuse terminals are energized.
 - o Use nonconductive ropes and hand lines near exposed energized parts.
 - o Guard enclosed live parts (that are exposed for maintenance or repair) with protective shields, protective barriers, or insulating materials to protect unqualified persons from contact with the live parts.
- Use alert techniques to warn and protect employees from the hazards which could cause injury due to electric shock, burns, or failure of electric equipment parts.
 - o Use safety signs, safety symbols, or accident prevention tags to warn employees about electrical hazards that endanger them.
 - o Position attendants to warn and protect employees when signs and barricades do not provide sufficient warning and protection from electrical hazards.

5. To re-energize equipment, conduct tests and visual inspections as necessary to verify that all tools, electrical jumpers, shorts, grounds, and other such devices are removed, so that the circuits and equipment can be safely energized; employees designated to perform tasks ensure that they:
- a. warn other employees exposed to the hazards associated with re-energizing the circuit or equipment to stay clear of circuits and equipment.
 - b. remove lock and tag (according to KM's Lockout/Tagout Policy and Procedure).
 - c. turn disconnect or switch ON.
 - d. turn appliance switch ON and verify that machine or equipment is operating; if it is not, contact electrician.

Inspection and Handling of Electrical Equipment

Inspection of electrical equipment is essential to identify unsafe equipment, cords and connectors. Equipment that is defective or damaged is removed from service and not returned to use until repairs are made and testing is complete. Equipment and parts are handled in a manner that does not cause damage to the electrical components. Employees inspect and handle electrical equipment using the following guidelines:

1. Visually inspect plug and cord connected equipment periodically before use for external defects and for evidence of possible internal damage. Check that the plug and receptacle contacts are of proper mating configurations (one male for each female contact). Inspect testing instruments and equipment prior to use for external defects.
2. Handle cord- and plug-connected equipment, including flexible cord sets (extension cords), in the following manner so as not to cause damage or injury.
 - Do not use cords connected to equipment for raising or lowering the equipment.
 - Do not fasten flexible cords with cables or hangers that damage can occur to the outer jacket or insulation.
 - Use flexible cords with grounding-type equipment to contain an equipment grounding conductor.
 - Do not connect or alter plugs and receptacles in a manner to prevent proper continuity of the equipment grounding conductor at the point where plugs are attached to receptacles.
 - Do not alter devices to allow the grounding pole of a plug to be inserted into slots intended for connection to the current-carrying conductors.
 - Do not use adapters which interrupt the continuity of the equipment grounding connect.
 - Use portable electric equipment and flexible cords that are approved for highly conductive work location or contact with water or conductive liquids.
 - Make plug connections with dry hands or with insulating protective equipment when conditions warrant.
 - Properly secure locking-type connectors after connection
3. Do not manually re-energize the circuits of electric power and lighting circuits when reenergized by a circuit protective device until it is determined that the equipment and circuit can be safely energized; when de-energizing and re-energizing, apply the following conditions to the specific items:

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- Use load rated switches, circuit breakers, or other devices specifically designed as disconnecting means for the opening, reversing, or closing of circuits under load conditions.
- Do not use the following types of cable connectors for opening, reversing, or closing of circuits, except in an emergency: load-break type, fuse, terminal lug, and cable splice connection.
- Do not modify over-current protection of circuits and conductors, even temporarily, beyond its voltage rating without disrupting service to equipment and circuits.

NOTE: The repetitive manual closing of circuit breakers or re-energizing circuits through replaced fuses is prohibited (determine cause of blown fuse of tripped breaker).

4. Perform testing (by qualified persons) on electric circuits or equipment with test instruments, equipment and their accessories that are rated for the circuits and equipment to be tested and designed for use in the surrounding environment.
5. Do not use electric equipment capable of igniting flammable materials, unless measures are taken to prevent hazardous conditions from developing; flammable materials include, but are not limited to: flammable gases, vapors, or liquids; combustible dust; and ignitable fibers.

Training

Training is based on the duties and functions to be performed by each employee by review of the Policy and Procedure; some KM employees are not involved in work performed on electrical equipment. Employees that are competent to work with electricity must have the following:

- KM and techniques to distinguish exposed live parts from other parts of electric equipment.
- KM and techniques to determine the nominal voltage of exposed live parts.
- Clearance distances with the corresponding voltages to which they are exposed.
- Safety related work practices that pertain to their respective job assignments.
- Any electrically related safety practices not specifically addressed in this procedure but which are necessary for their safety.

The HSE Manager or designee must verify that employees have an understanding of the training and have the ability to use the Policy and Procedure properly. Re-training is provided if there are changes that render previous training obsolete, or if an employee has not retained the requisite understanding or KM.

	Policies and Procedures	Issue 2-27-04
	ELECTRICAL SAFETY	Rev. date 7/29/10

Policy

It is the policy of STEVE KENTTRUCKING that electrical work is always performed safely.

Procedure

Prior to working on machines or equipment that operate using electricity, personnel are required to

1. Isolate the machine or electrical equipment using information found in Lockout! Tagout/Blockout Policy and Procedure.
2. Verify the equipment has been de-energized using information found in Lockout! Tagout/Blockout Policy and Procedure.

Once the equipment to be repaired, serviced or inspected is energized through an electric cord, the process to de-energize the machine or equipment and control the hazardous electricity is to:

- turn OFF machine/equipment at its power (ON/OFF) switch,
- unplug machine/equipment by removing the plug from the wall receptacle, and
- turn machine/equipment switch ON to verify electricity is off (does not start).

If machine equipment starts up, cease further activities and contact an electrician. Do not work on machine or equipment until an electrician finds out why the machine or equipment did not de-energize.

1. To de-energize electrical machines or equipment to conduct repairs, perform maintenance or conduct an inspection:
 - a. Check exterior of disconnect or switch box for damage or deterioration; if determined unsafe, contact electrician.
 - b. Using right hand and while wearing an electrical glove, shut off disconnect or switch in switch box and/or unplug from power source (put in OFF position).
 - c. Use voltage tester to verify electricity is disrupted between electricity source and machine or equipment; if electrical current is detected, cease further activities and contact electrician.
 - d. Turn equipment switch ON to verify it has no electrical energy, then OFF again.
2. Apply locks and/or tags (refer to *Lockout/Tagout/Blockout Policy and Procedure*).
3. Place proper electrical danger/warning tag on each disconnected part (refer to

Accident Prevention Signs and Tags Policy and Procedure).

4. Select and use appropriate safe work practices and equipment when conducting work on equipment which has been de-energized:

- Provide adequate illumination to safely perform work.
- Have qualified person disable electrical safety interlocks temporarily while work is conducted on equipment; return interlock systems to operable condition when work is completed.

KM EMPLOYEES DO NOT WORK ON ENERGIZED

ELECTRICAL EQUIPMENT I

5. To re-energize equipment to conduct tests or visual inspections.

- a. verify all tools, electrical jumpers, shorts, grounds, and other such devices are removed so circuits/equipment can be safely energized.
- b. warn other employees exposed to hazards associated with re-energizing circuit/equipment to stay clear of circuits/equipment.
- c. remove lock and tag (according to *Lockout/Tagout/Blockout Policy and Procedure*).
- d. turn disconnect or switch **ON**.
- e. turn equipment switches **ON** and verify machine or equipment is operating; if not, stop activities and contact electrician.

Energized Equipment

When personnel are working on or near exposed energized parts (involving either direct contact or contact by means of tools or materials) or near enough to them for personnel to be exposed to any hazard the energized parts present, they will follow these safe practices:

- Only qualified personnel may work on electric circuit parts of equipment that have not been de-energized.
- Such personnel must be capable of working safely on energized circuits and must be familiar with proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials and insulated tools.
- When working in vicinity of overhead lines, whether elevated or on ground, personnel must avoid contact with exposed energized parts when approaching or taking any conductive object without an approved insulating handle, unless:

person

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is

insulated from energized part (gloves, with sleeves if necessary, rated for voltage involved are considered to be insulation of person from energized part on which work is performed), or energized part is insulated both from all other conductive objects at a different potential and from person, or person is insulated from all conductive objects at a potential different from energized part.

-Qualified personnel must maintain the following *distances* from energized equipment:

- o If 300 volts or less, avoid contact.
- o It between 300 volts and 750 volts, one (1) foot.
- o If between 750 volts and 2000 volts, one and one-half (1.5) feet.

‘KM will, NOT, be working near electrical equipment With more man 2,000 volts.)

Un-qualified personnel must maintain the following distances:

- o Up to 2,000 volts, at least 10 feet.

- Personnel must not enter spaces containing exposed energized parts unless illumination is provided that enables personnel to perform work safely. If lack of illumination or an obstruction precludes observation of work to be performed, personnel must not perform tasks near exposed energized parts. **Personnel must not reach blindly into areas which contain energized parts.**
- When personnel work in a confined or enclosed space (such as a manhole or vault) that contains exposed energized parts, KM or client provides (and personnel use) protective shields, protective barriers, or insulating materials as necessary to avoid inadvertent contact with these parts. Doors, hinged panels, and like must be secured to prevent their swinging into any personnel and causing personnel to contact exposed energized parts.
- Conductive materials and equipment in contact with any part of personnel’s bodies must be handled in manner that prevents them from contacting exposed energized conductors or circuit parts. If personnel must handle long dimensional conductive objects (such as ducts or pipes) in areas with exposed energized parts, KM- personnel or client institutes work practices (such as use of insulation, guarding, and material handling techniques) which minimize hazards.
- Portable ladders must have non-conductive side rails if they are used where personnel or ladder could contact exposed energized parts.
- Conductive articles of jewelry and clothing (such as watch bands, bracelets, rings, key chains, necklaces, aprons with metals, cloth with conductive thread, or metal headgear) **must not be worn** if personnel might contact exposed energized parts. However, such articles may be worn if they are rendered non-conductive by covering, wrapping, or other insulating means.
- Where live parts present an electrical contact hazard, personnel must not perform housekeeping duties at such close distances to parts that there is a possibility of contact, unless adequate safeguards (such as insulating equipment

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are provided. Electrically conductive cleaning materials (including conductive solids – steel wool, cloth with metals, silicon carbide – as well as conductive liquid solutions) must not be used in proximity to energized parts unless procedures are followed which prevent electrical contact. Only a qualified person may disable an electrical safety interlock (following required procedure), and then only temporarily while working on equipment; interlock system must be returned to operable condition when work is completed.

- Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines shall be operated so that a clearance of 10ft. (305 cm) is maintained, regardless of the conditions.
- Employees standing on the ground may not contact the vehicle or mechanical equipment or any of its attachments, regardless of the conditions.
- if any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines is intentionally grounded, employees working on the ground near the point of grounding may not stand at the grounding location whenever there is a possibility of overhead line contact. Barricades or insulation shall be used, to protect employees from hazardous ground potentials.

Ground-Fault Circuit Interrupters

The following information applies to Ground-Fault Circuit Interrupters (GFCI):

- All 125-volt, single-phase, 15-, 20-, and 30-ampere receptacle outlets that are not part of the permanent wiring of the building or structure and that are in use by personnel shall have ground-fault circuit-interrupter protection for personnel.
- A cord connector on an extension cord set is considered to be a receptacle outlet if the cord set is used for temporary electric power.
- Cord sets and devices incorporating the required ground-fault circuit-interrupter that are connected to the receptacle closest to the source of power are acceptable acceptable forms of protection.
- Receptacles other than 125 volt, single-phase, 15-, 20-, and 30-ampere receptacles that are not part of the permanent wiring of the building or structure and that are in use by personnel shall have ground-fault circuit-interrupter protection for personnel.

KM will ensure that GFCI is available for all electrical cords used with power equipment and will not use power equipment requiring more than 125 volts (single phased) or 15-20 and 30-amperes; this eliminates the need for an assured equipment grounding conductor program”.

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Inspection and Handling of Electrical Equipment

Inspection of electrical equipment is essential to identify unsafe equipment, cords and connectors. Equipment that is defective or damaged is removed from service and not returned to use until repairs are made and testing is complete. Equipment and parts are handled in a manner that does not cause damage to the electrical components. Personnel inspect and handle electrical equipment using the following guidelines:

1. Visually inspect cord- and plug-connected equipment periodically before use for external defects and for evidence of possible internal damage. Check plug and receptacle contacts for proper mating configurations (one male for each female contact, including one ground). Inspect testing instruments and equipment prior to use for external defects.

2. Handle cord- and plug-connected equipment, including flexible cord sets (extension cords), in following manner so as not to cause damage or injury.

- Replace electrical equipment extension and power cords when damaged.
- Do not use cords connected to equipment for raising/lowering equipment.
- Do not fasten flexible cords with cables or hangers that can damage outer jacket or insulation.
- Use flexible cords with grounding-type equipment to contain an equipment grounding conductor.
- Do not connect or alter plugs and receptacles in manner to prevent proper continuity of equipment grounding conductor at point where plugs are attached to receptacles.
- Do not alter devices to allow grounding pole of a plug to be inserted into slots intended for connection to current-carrying conductors.
- Do not use plug adapters which interrupt continuity of equipment grounding connection.
- Use portable electric equipment and flexible cords approved for highly conductive work locations or contact with water or conductive liquids.
- Make plug connections with dry hands or with insulating protective equipment.

3. Do not manually re-energize circuits of electric power and lighting circuits when de-energized by a circuit protective device until it is determined equipment and circuit can be safely energized; when de-energizing and re-energizing, apply following conditions to specific items:

- Use load rated switches, circuit breakers, or other devices specifically designed as disconnecting means for opening, reversing, or closing of circuits under load conditions.
- Do not use following types of cable connectors for opening, reversing, or closing of circuits, except in emergency: load-break type, fuse, terminal lug, and cable splice connection.
- Do not modify over-current protection of circuits and conductors, even

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temporarily, beyond its voltage rating without disrupting service to equipment and circuits.

NOTE: The repetitive manual closing of circuit breakers or re-energizing of circuits through replaced fuses is prohibited (determine cause of blown fuses of tripped breaker).

4. Perform testing on electric circuits or equipment with test instruments, equipment and their accessories that are rated for circuits and equipment to be tested and designed for use in surrounding environment.

5. Do not use electric equipment capable of igniting flammable materials, unless measures are taken to prevent hazardous conditions from developing; flammable materials include, but are not limited to, flammable gases, vapors, or liquids; combustible dust; and ignitable fibers.

Training

Training is accomplished by reviewing the contents of this Policy and Procedure with employees initially and then as needed when changes occur thereafter. Verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee successfully complete a written test. Training is recorded on the *Training Report* to reflect the training received.

Recordkeeping

Performance-Based Training Written Tests completed during the training session are placed in appropriate HSE files and maintained for two (2) years, then discarded.

Standard: 29 CFR 1910.333 Electrical Safety-Related Work Practices

1910.333 Selection and use of work practices. (a) *General.* Safety-related work practices shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work is performed near or on equipment or circuits which are or may be energized. The specific safety-related work practices shall be consistent with the nature and extent of the associated electrical hazards.

(b) *Working on or near exposed de-energized parts—*(1) *Application.* ... Conductors and parts of electric equipment that have been de-energized but have not been locked out or tagged in accordance with paragraph (b) of this section shall be treated as energized parts, and paragraph (c) of this section applies to work on or near them. (2) *Lockout and tagging.* While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been reenergized, the circuits energizing the parts shall be locked out or tagged or both in accordance with the requirements of this paragraph.

(ii) *Dc-energizing equipment.* (A) Safe procedures for de-energizing circuits and equipment shall be determined before circuits or equipment are de-energized. (B) The circuits and equipment to be worked on shall be disconnected from all electric energy sources. Control circuit devices, such as push buttons, selector switches, and interlocks, may not be used as the sole means for

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De-energizing circuits or equipment. Interlocks for electric equipment may not be used as a substitute for lockout and tagging procedures. (C) Stored electric energy which might endanger personnel shall be released. capacitors shall be discharged and high capacitance elements shall be short- circuited and grounded, if the stored electric energy might endanger personnel. (O) Stored non- electrical energy in devices that could reenergize electric circuit parts shall be blocked or relieved to the extent that the circuit parts could not be accidentally energized by the device.

Standard (continued) - -

(iii) *Application of locks and tags.* (A) A lock and a tag shall be placed on each disconnecting means used to de-energize circuits and equipment on which work is to be performed, except as provided in paragraphs (b)(2)(iU)(C) and (b)(2)(iii)(E) of this section.

(iv) Verification of de-energized condition. The requirements of this paragraph shall be met before any circuits or equipment can be considered and worked as de-energized.

(v) Re-energizing *equipment*. These requirements shall be met, in the order given, before circuits or equipment is reenergized, even temporarily.

web address is www.gpoaccess.cio/vlecf in *Browse*, scroll down to and click “Title 29 — Labor”; click “GO”; search and click 1900-1910 (1901.1-1910.999); search and click 1910.1 to 1910.901- 191 0.999; click “1910.331-1910.335 Electrical Safety-Related Work Practice”.]

Kent Materials	Policies and Procedures	Issue 8-6-03
	EMERGENCY EVACUATION /FIRE PREVENTION	Rev. date 4/18/2011

Purpose

The Emergency Evacuation and Fire Prevention Policy and Procedure provides the company with a method to ensure that employees prevent fires in the offices and buildings, and employees and visitors safely evacuate the buildings and properly report the emergency if an emergency occurs (29 CFR 1910.38). [The web address for a current copy of the standard is www.osha.gov Search “1910.38”; double click “1910.38 Emergency action plans”.]

Policy

It is the policy of Kent Materials (KM) to protect its employees and visitors from harm if an emergency occurs in its offices and buildings.

Procedure for Evacuation

Kent Material’s evacuation floor plans are posted in strategic locations throughout its offices. Each employee working in these offices must review the floor plans and determine his/her primary and secondary escape routes if a drill or an actual emergency occurs. Employees follow the steps as described in the following sequence, unless factors dictate otherwise:

1. Determine the emergency: fire, explosion, bomb threat, workplace violence, etc., by identifying the emergency and/or by listening to what co-workers are saying. Evacuation may be required under the following circumstances:

- Fire
- Bomb, Explosion or Chemical Threat
- Workplace Violence

2. Make a verbal announcement of the emergency. Include in the announcement what type of emergency, whether an evacuation is occurring, who is to evacuate, etc.

3. Collect your thoughts and think first of your **primary** escape route assignment.

CAUTION: If conditions indicate your primary escape route is blocked, collect your thoughts quickly and select the secondary escape route.

4. Evacuate the building by **traveling your** selected escape route. Assist personnel along the way, if **necessary**, but always protect yourself in the process.

NOTE: Owner-Operators that infrequently visit the office are regarded as visitors. KM office employees are responsible for escorting all visitors from the building.

5. Report the emergency to the appropriate emergency response organization (fire department,

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HAZMAT unit, ambulance, etc.) and to management. (See *Emergency Reporting Procedures* for additional information.)

6. After you evacuate the building, report to the designated “head count” area; the head count area for the;

- a. office in Port Allen is at the end of the driveway next to the road,
- b. yard / shop in Port Allen is at the entrance gate, and

7. Check in with the “Head Count” person there for instructions or information. The “Head Count” person for the

- a. office in Port Allen is Larry Giordana,
- b. yard / shop in Port Allen is Eddie Gantt, and

8. Assist where needed until the emergency conditions are under control.

Employees working in these offices must take the time to periodically review this procedure and the floor plan to ensure a quick but safe evacuation if an emergency occurs.

Procedure for Fire Prevention

At Kent Materials, fire prevention is a top priority. Good housekeeping and maintenance are followed to keep fire hazards to a minimum, six (6) hazards are identified within the Emergency Evacuation and Fire Prevention Plan. If further information is needed, consult the table of hazards within the Plan.

I. General housekeeping is conducted daily to keep the accumulations of paper to a minimum.

2. Inspect the potential hazards from the table quarterly, and document the results of the inspection on the HSE Inspection Report.

3. Inspect the fire extinguishers monthly to verify they are in good working condition and in their designated positions, and document the inspection on the HSE Inspection Report.

4. Contact the vendor to maintain or repair fire extinguishers found to be in poor condition or improperly pressurized.

5. Train all affected employees in the operation of the fire extinguishers and which extinguishers to use on what fire situations.

If it is determined that the Emergency Evacuation and Fire Prevention procedures are not addressing all areas of concern, changes are made to the procedures to increase employee safety.

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Procedure for Emergency Reporting

Any employee may detect an emergency or a condition or situation that may result in an emergency, at any time, on any day. If an employee detects an emergency, he/she reports that emergency quickly and correctly so the appropriate emergency response organization (fire department, HAZMAT unit, ambulance, etc.) can respond quickly to minimize the consequences of the emergency. In addition, Kent Materials employees report emergencies to management immediately after the emergency is reported to the response organization (or as soon as possible). The procedure for reporting emergencies at Kent Materials is as follows:

1. Call the appropriate response organization:

Ambulance 911 Poison Control 1-800-256-9822
Fire 911 or 225-389-4357 NRC (Spills) 1-877-925-6595
Police/Sheriff 911 or 225-389-3831 or 225-389-5000

Occupational Health Clinic at Baton Rouge General Medical Center
225-381-6249

NOTE: These telephone numbers are placed on several walls within view of telephones throughout the building.

2. Give the person who answers your name, your location address, and a brief but complete **description of the emergency**. Then remain on the telephone line to clarify information or answer additional questions until the person who answered releases you.

Our main office address is: 1555 Beaulieu Lane. Port Allen, LA

3. Once you hang up with the emergency response organization; you are free to call management.

<u>Name</u>	<u>Mobil #</u>
Steve Kent	225 937-0434
Gerard Smith	225-278-6984
Brad Antie	225-235-0711
Safety Manager	225-930-4512

4. Once the emergency is reported, the employee continues at whatever stage of the emergency action he/she is in: fighting the fire, performing First Aid/CPR, handling critical duties, etc.

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Procedure for Drills

At Kent Materials, emergency drills are performed at least annually to keep awareness levels elevated for the safety of our employees and visitors. Drills resemble as closely as practicable a real emergency evacuation and include the following steps:

1. HSE Manager generates a written emergency drill scenario by completing the following on a separate sheet of paper:
 - Type of emergency _____
 - Where emergency is occurring _____
 - Other applicable information _____
2. HSE Manager presents the drill scenario to any employee to initiate the drill; HSE Manager observes and documents all observations made during the drill.
3. Employee receiving the drill scenario makes a verbal announcement based on the scenario, preceded by the words, **THIS IS A DRILL**.
4. Employees perform roles and responsibilities according to the Plan:
 - Collect thoughts; if necessary, repeat **THIS IS A DRILL** when communicating the emergency to others.
 - If appropriate, all employees evacuate the building and assist others while doing so.
 - Employee(s) report(s) emergency; dial ### and provide appropriate mock information (see *Emergency Reporting* information).
 - Employees (visitors) report to “head count” area.
 - Employees (visitors) check in with “head count” person.
 - Employees assist where needed.
5. HSE Manager reports the observations made during the emergency drill, then leads a discussion of the group to critique the emergency evacuation procedure.
6. HSE Manager documents the drill on the HSE Inspection Report, and submits the Report to the Port Allen office for filing.

Rehearsing emergency drills helps to reinforce the actions that management and employees need to take in order to respond appropriately in a real world emergency.

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Purpose

The purpose of the Training Policy and Procedure is to identify the training requirements of all Kent Materials employees and owner-operators, provide a process to ensure that they are properly trained, and ensure the training is documented and reported according to the requirements.

Policy

It is the Policy of Kent Materials (KM) that employees and owner-operators are properly trained according to the standards and best practices available.

Procedures

The training procedure begins by carefully evaluating the duties and activities of each job position within KM to determine what training is required, and how often, and ends by evaluating employees and owner-operators to ensure that they are healthy and safe, and they know how to protect themselves, the public, the environment, and their equipment.

Employees and owner-operators are trained throughout the year in the various plans, programs, permits, policies and procedures which make up the KM Health, Safety and Environmental Management System. The HSE Manager has the responsibility of managing the training procedure according to these requirements by conducting the training, by using outside training organizations, or by using in-house trainers or instructors. The HSE Manager completes the following to plan, organize and develop the training process:

1. Evaluates KM employee and owner-operator positions to determine what training applies, and the frequency of re-training in relation to activities performed by employees and owner-operators in particular job positions.
2. Generates a list of required training for the health, safety and environmental plans, permits, programs, policies and procedures that pertain to activities within these job positions (see Attachment #1, *Required Training*); the shaded items are required training for all employees and owner-operators, regardless of their job positions.
3. Determines how employees and owner-operators are trained (Training Method: Review Procedure, Outsource or both) and by whom (Trainer/Instructor: HSE Manager or Designee; Outside Training Organizations) (see Attachment #1, *Required Training*).
4. Compares job positions to required training in order to generate a Training Matrix which identifies training for specific positions (see Attachment #2, *Training Matrix*).

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5. Submits the Training Matrix to Management for review and comment; edits the Matrix to reflect the comments received.

The evaluation process and preparation of the Training Matrix is repeated annually or whenever changes in job positions significantly affect the required training.

HSE Manager and Designee Responsibilities

Training completed by the HSE Manager (or his designee) is conducted at the office in Port Allen or the office of the Kent Materials hire location; training may also be conducted by the outside training organization at their training facility location. Regardless, the HSE Manager (or his designee) or organization conducts the training by completing the following:

1. Determines elements to be trained during a particular time period (month/quarter); selects element to train.
2. Coordinates with KM Management to schedule employees and owner-operators for specific training date and time.
3. Notifies affected employees and owner-operators of the date and time of the training.
4. Completes that Training Documentation form relating to the training session being conducted (see Attachment #3, *Training Documentation*).
5. Reviews the Policy and Procedure to become very familiar with its content, especially the section on Training.
6. Locates, obtains and prepares any training materials needed to conduct the training and review the procedure with the employees and owner-operators, including copies of the Policy and Procedure.
7. Plans and organizes the training session to be conducted.
8. Distributes copies of the Policy and Procedure to the employees when they arrive for the training.
9. Conducts the training and/or administers the tests, including a review of the steps in the Policy and Procedure.
10. Presents Training Documentation form to employees to sign at the end of the training session; collects form when they have signed.
11. Restores/resumes any training and/or testing materials needed to conduct the training.
12. Reviews Training Documentation form and/or tests administered during the training sessions to verify training is complete.

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13. Provides the completed and signed Training Documentation form and/or tests to the Safety Coordinator to file in the Port Allen office.

14. If necessary, follows-up with those employees that registered but did not attend, to reschedule training missed for the next available training session or assigns training to be provided by their respective Supervisor.

15. If a Certificate and/or wallet card is required, ensures that the certificate and/or card are generated and submitted to the Safety Coordinator for proper handling and distribution.

16. Prints and distributes the Training Report (hard copy, electronic copy) to identify status of employee training to Managers and Supervisors during the reporting period (see Attachment #4, *Training Report*).

HSE Manager repeats the process again and again until all of the required training is completed. If training is conducted by an outside training organization, HSE Manager provides the trainer/instructor with the appropriate information and documentation to enable the outside organization to conduct the training and, when the training is complete, collects the appropriate information and documentation from the outside training organization trainer/instructor to complete the paperwork for KM.

Observations/Inspections are conducted in the field and in the workplace, and testing is done periodically to determine if the training is effective, and is making an impact on the safety and health of KM employees and owner-operators, and the KM environment. If it is not, and if incidents are occurring, employees and owner-operators may be re-trained on the material or information before the published frequency.

The Training Report is audited to ensure that all employees obtain the required training; Managers and Supervisors are notified of the audit and of the results, including reasons why employees did not accomplish the training in a timely manner.

Attachment #1

REQUIRED TRAINING

Required Training	Standard/best Practice	Frequency	Training method	Trainer/Instructor
Access to Medical Records	29CFR 1910.1020	Initially, annually	Review Procedure	HSE Manager/Supervisors
Accident Prevention signs/tags	29CFR 1910.145	Once, other not specified	Review Procedure	HSE Manager/Supervisors
Blood borne Pathogens	29 CFR 1910.1030	Initially; annually; changes	Pure Safety	HSE Manager/Supervisors
Confined Space (permit-Required)	29 CFR 1910.146(G)	Initially; changes	Pure Safety	HSE Manager/Supervisors
Contraband	Best Practice	Once, other not specified	Review Procedure	HSE Manager/Supervisors
Contractor Management	Best Practice	Once; other not specified	Review Procedure	HSE Manager/Supervisors
Defensive Driving large Vehicles	Best Practice	Once; other not specified	Outsource, Pure Safety	Outside instructors
DOT Driver compliance	DOT Regulation	Initially; annually	Pure Safety	
DOT HM 126f / non-hazardous	49 CFR 172.704 HM 126	Initially; annually	Pure Safety	HSE Manager/Supervisors
Dot HM 232 Security plan	49 CFR 172.704 HM 232	Initially; every three years	Review Procedure	HSE Manager/Supervisors
Disciplinary policy	Best Practices	Initially; as needed	Review Procedure	HSE Manager/Supervisors
Drug and Alcohol	49 CFR 40, 382, 653	Once; other not specified	Review Procedure	HSE Manager/Supervisors
Egress and emergency Action Plans	EAP Requirements	Initially; as needed	Pure Safety	
Emergency Evacuation/fire Prevention	29 CFR 1910 .38(a)	Once; other not specified	Pure Safety	HSE Manager/Supervisors
Fall Protection	29 CFR 1910.66 1926. 503	Initially; prior to each use	Pure Safety	HSE Manager/Supervisors
Flammable and consumable Liquids	DOT Regulation	Initially; as needed	Pure Safety	
Fire Safety/Fire Extinguisher	29 CFR 1910.157 (G)	Initially; as needed	Pure Safety	HSE Manager/Supervisors
First Aid/CPR	29 CFR 1910.151(b)	Initially; as needed	Pure Safety	Outside Instructor
Industrial Powered Trucks	29 CFR 1910.178(l)	Initially; as needed	Pure Safety	HSE Manager/Supervisors
Hand Wrist and finger Safety	Best Practice	Initially; as needed	Pure Safety	
Hazard Communication	29 CFR 1910.1200(h)	Initially; annually; changes	Pure Safety	HSE Manager/Supervisors
Hazards of Speeding- Large Vehicles	Best Practice	Initially; as needed	Pure Safety	
HAZWOPER	29 CFR 1910.120	Initially; annually	Outsource; pure safety	HSE Manager/Supervisors
Hearing Conservation	29 CFR 1910.95	Initially; as needed	Pure Safety	HSE Manager/Supervisors
Heat stress	Best Practice	Initially; as needed	Pure Safety	
Housekeeping on the job	Best Practice	Initially; as needed	Pure Safety	
Hydrogen Sulfide H2S	MSDS for H2S	Initially, every 3 years	Pure Safety	HSE Manager/Supervisors
Incident Reporting	Best Practice	Once, other not specified	Review Procedure	HSE Manager/Supervisors
Job Safety/environmental analysis	Best Practice	Once; other not specified	Review Procedure	HSE Manager/Supervisors
Lifting Equipment (cranes)	29 CFR 1910.1700	Once; other not specified	Review Procedure	HSE Manager/Supervisors
Load Sacrament and Distribution	DOT regulations	Initially; as needed	Pure Safety	
Lockout/Tag out	29 CFR 1910.147 (c)(7)	Initially; changes	Pure Safety	HSE Manager/Supervisors
Maintenance Yard Practices	Best Practice	Once; other not specified	Review Procedure	HSE Manager/Supervisors
New Employee Orientation	Best Practice	Once; other not specified	Pure Safety	Supervisors/clerical
Office Safety	Best Practice	Initially; as needed	Pure Safety	
Hand and Power Tools	Best Practice	Once; other not specified	Pure Safety	HSE Manager/Supervisors
Personal Protective Equipment	29 CFR 19190.132 (f)	Initially; changes	Pure Safety	HSE Manager/Supervisors

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Attachment #3
Training Documentation

Name of training course: _____

Course required by (Standard, Best Practice): _____

Name of trainer/instructor: _____

Date course conducted _____ ended _____ Time started ended _____

Length of course ____ hrs Type training (check one): Initial____ Annual____ Retraining _____

Means to verify understanding (check) Written test ____ Verbal Test _____ Demonstration _____

Description of course: _____

Person(s) attending/completing course:

Name (type or print)

Signature

KENT MATERIALS

Employee Warning Notice

Employee Information

Employee Name: _____ Date: _____
Job Title: _____
Manager: _____ Department: _____

Type of Warning

☐ First Warning ☐ Second Warning ☐ Final Warning

Type of Offense

☐ Tardiness/Leaving Early ☐ Absenteeism ☐ Violation of Company Policies
☐ Substandard Work ☐ Violation of Safety Rules ☐ Rudeness to Customers/Coworkers
☐ Other: _____

Details:

Description of Infraction:

Plan for Improvement:

Consequences of Further Infractions:

Acknowledgement of Receipt of Warning

By signing this form, you confirm that you understand the information in this warning. You also confirm that you and your manager have discussed the warning and a plan for improvement. Signing this form does not necessarily indicate that you agree with this warning.

Employee Signature

Date

Manager Signature

Date

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Witness Signature (if employee understands warning but refuses to sign) Date

Policy

It is the policy of Kent Materials that all employees working at elevations (six feet or greater without permanently-installed guard rails or hand rails) wear fall protection, which is provided to them.

Procedure

The Kent Materials Operations Manager has the responsibility and authority to implement this Fall Protection Procedure, make continuous observations and safety checks of the work site, and enforce various aspects of the Procedure. The Operations Manager is responsible for correcting any unsafe acts or conditions immediately. All affected employees have the responsibility to understand and adhere to the requirements of this Procedure and to follow the instructions of the Operations Manager. It is also the responsibility of all employees to bring to the Operation Managers attention any unsafe or hazardous conditions or acts that may cause injury to themselves or others.

The Fall Protection Procedure is implemented for all work performed at elevations of six feet or greater at the job site. The Operations Manager considers the work to be performed, the equipment needed to perform the work, and the impact the work will have on other operations that may be on-going at the time. The Operations Manager:

1. Reviews scope of work and determines following:
 - a. What are equipment and rigging requirements?
 - b. Are there any additional requirements (crane, etc.)?
2. Determines type of fall protection "system" to use for scope of work planned.
3. Completes *Fall Procedure Checklist* (see attached) and reviews contents of Checklist with employees involved in work.
4. Verifies employees are skilled and trained according to Procedure; provides training prior to use to ensure compliance with Procedure.
5. Brings copy of *Checklist* to job site; prepares job site; inspects, delivers and issues equipment; and begins work.

The Fall Protection Checklist is completed for each separate job assignment or group of job assignments (if similar) to ensure that the necessary steps have been taken to protect the employees, the environment, and the equipment and facility. Employees assigned to the job are briefed regarding any findings resulting from the *Fall Protection Checklist*, and steps are taken or precautions are required to ensure the safety of all personnel before the actual work begins.

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The Operations Manager selects the equipment and determines the type of fall protection system (see below) he will use for the work to be performed by referring to the following sections on the following pages:

- **Safety Monitoring Systems**
- **Controlled Access Zones**
- **Personal Fall Arrest Systems**

Fall Protection includes the use and operation of guardrail systems, personal fall arrest systems, safety net systems, positioning device systems, warning line systems, safety monitoring systems, controlled access zones, and other protections in either conventional or non-conventional applications. **All fall protection equipment must meet applicable ANSI, ASTM and OSHA requirements.** There is no reason why the use of conventional fall protection systems (personal fall arrest systems, controlled access zones, or safety monitoring systems) is not feasible and would not be used by Kent Materials employees, or why their use would create a greater hazard.

Safety Monitoring System

A Safety Monitoring System is established to provide constant surveillance of the job site when no other alternative measure is implemented, as required by 29 CFR 1926.502(h), *Safety monitoring systems*. The safety monitor is a Kent Materials -designated competent person responsible for recognizing unsafe conditions and behaviors and warning employees of fall hazards and other hazardous conditions while the work is being performed, and has been trained to recognize fall hazards. However, the responsibility for safety rests with everyone who detects a fall hazard or other hazardous condition. The Safety Monitor accomplishes the following:

- Performs only responsibilities which are associated with monitoring function, and not those which would take monitor's attention away from monitoring function.
- Takes position on same walking/working surface and within visual distance of monitored employees.
- Takes position close enough to communicate verbally with monitored employees.
- Warns employees (verbally) when it appears employee is unaware of fall hazard or is behaving in an unsafe manner.
- When necessary, **stops work when an unsafe condition or behavior is observed**, and corrects it or notifies the Foreman who corrects condition or behavior before personnel are allowed to continue working.

Controlled Access Zones

A Controlled Access Zone is defined as an area (location) designated and clearly marked in which leading edge work may take place without the use of a guard rail, safety net, or personal fall arrest equipment to protect the employees, in accordance with 29 CFR 1926.502(g), *Controlled access zones*. Site specific plans are not warranted because Controlled Access Zones are not utilized by Kent Materials.

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Personal Fall Arrest Systems

Personal fall arrest systems and their use shall comply with the provisions set forth in 29 CFR 1926.502(d); the system includes a full body harness worn by the elevated worker(s) and connected to an anchor point using a variety of connectors. The equipment most often used for working at elevations includes full body harnesses, lanyards, self-retracting lifelines (SRL), ladder climbing devices and climbing assists, positioning devices and tie offs:

A **fully body harness** is required to properly distribute fall arrest forces to minimize injury to the body in the event of a fall. The maximum arresting force on an employee is limited to 1,800 lbs. The harness is made of polyester, is ANSI Z359.1 approved, and is capable of supporting 5,000 lbs.



Lanyards are a maximum of six feet in length, and are ANSI Z359.1 approved. Lanyards have a shock-absorbing device integral to them; the shock absorber allows for a maximum deceleration distance of 3.5 feet, and limits fall arrest forces to 900 lbs. All snap hooks integral to the lanyards are self-locking/self-closing design and are connected to the dee-ring of the full-body harness. Lanyards are capable of supporting 5,000 lbs.

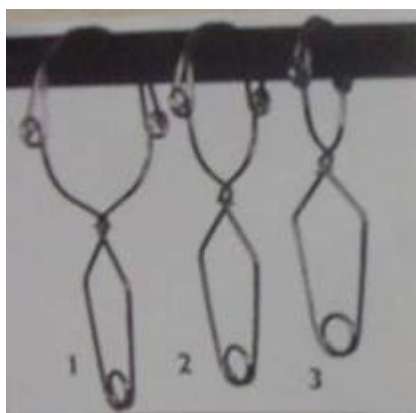


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Self-Retracting Lifelines (SRL) are installed using ANSI Z359.1 approved connectors (i.e., carabineers or anchor pads/straps), to an anchor point capable of supporting 5,000 lbs. The attachment point of the SRL is at the dorsal (upper back) D-ring of the harness. Do not use an SRL with a shock absorbing lanyard. SRL are used when the potential free fall distance is greater than six feet, or when the height of the walking/working surface is less than twelve feet from ground level.

Ladder safety devices or **climbing assists** are used with a full body harness on fixed ladders when a ladder is more than twenty (20) feet in unbroken length as per 29 CFR 1910 Subpart D. All ladder safety devices meet the requirements which they serve.



Hooks



Double Hatch Hooks

Positioning devices are required to have the following:

Rigged such that an employee cannot free-fall more than two (2) feet.

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- Secured to an anchorage capable of supporting 5,000 pounds.

Tie-Offs (for all fall protection equipment) are required to include the following:

- Large eye-bolts made of appropriate grade steel.
- Steel members or I-beams.
- Guardrails or railings if designed for use as anchor point.

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Fall protection applies to employees working at an elevation of six (6) feet or greater; six feet is measured from the next lower level to the soles of the employee's shoes. The fall protection must be of such a length as to prevent the employee from falling and striking the next lower level.

- Wear full body harness with an SRL when climbing ladder; shock-absorbing device is attached to secured overhead structure.
- Have guardrails in place or wear full body harness when working in hoist area; shock-absorbing device is attached to secured overhead structure.
- Use cover or guardrail system to protect employees from falling through holes and to prevent objects from falling through holes.
- Company-owned ramps, runways and other walkways must have guardrails.
- Have guardrails in place or wear full body harness when working less than six (6) feet above dangerous equipment.
- Wear full body harness with shock-absorbing device (attached to secured overhead structure) when working in areas where wall openings above six (6) feet from lower level are not protected by guardrails.
- Wear hard hat in designated areas; when exposure to falling objects from structure above is risk, other measures are considered and used: toe boards, guardrails, canopy structures or barricades.
- Toe boards are used as protection from falling objects.
- Use canopy (strong enough to prevent collapse and prevent penetration) as protection against falling objects.

Tying a knot in a lanyard can reduce its strength by 50% or more. Tying a lanyard around an I-beam (or similar support) can reduce its strength by 70% or more. Tying a lanyard around or over rough or sharp surfaces can reduce its strength drastically.

Inspections

All personal fall arrest equipment is inspected prior to each use and that inspection is documented on the Fall Protection Checklist, utilizing the following inspection guidelines (refer to illustrations above):

Webbing

- Inspect entire surface for damage and foreign material.
- Bend webbing every 6" to 8" and inspect for frayed threads, broken fibers, stitches pulled, cuts or chemical damage.
- If any damage found, discard/replace equipment immediately.

Buckles

- Inspect for loose, distorted or broken grommets.
- Inspect for holes and tears in waist strap or other strength members.
- Inspect for distortion and sharp edges; outer and center bars must be straight.

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Buckles (continued)

- Ensure corner and attachment points overall buckle frame and move freely back and forth in sockets and roller turns freely.
- Ensure rivets are tight and not able to move; rivets shall not be bent, pitted, cracked, or show signs of chemical exposure.
- If any damage found, discard/replace equipment immediately.

Rope

- Inspect for fuzzy, worn, broken or cut fibers.
- Inspect for noticeable changes in rope diameter.
- If any damage found, discard/replace equipment immediately.

Safety Straps

- Inspect for cut fibers, frayed area, corrosion damage or damaged stitches by flexing strap in inverted "U".
- Inspect friction buckle for slipping and sharp buckle edges.
- Inspect tongue for excessively work or elongated buckle holes.
- If any damage found, discard/replace equipment immediately.

Ladder Climbing Assists

- Inspect for tightness once installed on permanent ladder.
- Inspect cable for damage (broken wires, rust, kinks, etc.).
- If any damage found, discard/replace equipment immediately.

Positioning Devices and Tie-Offs

- Inspect for condition; if not in good condition, do not use.

If fall protection equipment experiences an in-service loading, the equipment is immediately removed from service, tagged out of service and is not used until inspected by a Competent Person and determined suitable for reuse.

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Maintenance and Storage

Basic care of fall arrest systems prolongs life and contributes to performance; clean components by accomplishing the following:

- Wipe off all surfaces with sponge dampened in cool water, rinse sponge and squeeze dry; dip sponge in mild solution of water and commercial soap or detergent and work up thick lather with vigorous back-and-forth motion.
- Rinse webbing in clean, cool water.
- Wipe belt dry with clean cloth and hang freely to dry; dry belt and other equipment away from direct heat and out of sun.
- Store in clean, dry area free of fumes, sunlight or corrosive materials in such a way that equipment will not warp or distort.

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Equipment is hung by the dee-ring to dry; equipment is not force dried. When not in use, equipment is hung in a clean, dry area by the dee-ring; equipment is never stored in a toolbox.

Rescue Plan

Prior to the start of work in a fall-hazardous area, a fall protection **Rescue Plan** must be designed to provide for the rescue of an individual from their suspended fall protection devices. The rescue equipment must be inspected. **Each employee involved must be trained in the operation of the emergency equipment and ready to perform a prompt rescue in the event an individual is suspended by their fall protection device.** The Plan includes necessary equipment that may be used, roles of each employee, and procedures, and must be accomplished in **less than fifteen (15) minutes** from the time of the fall:

1. Determine emergency equipment needs for type and location of work activities performed; place equipment in close proximity to activities.
2. Ensure employees and Supervisor is trained in operation of emergency equipment.
3. If incident occurs, employees notify immediate Supervisor; Supervisor facilitates rescue (with employee help) utilizing equipment and training.
4. Fall victim is given first aid and/or additional medical attention.



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Incident Investigations

In the event that someone falls, or some other related, serious incident occurs (for example, a near-miss), Kent Materials initiates an immediate investigation into the incident using the *Accident/Incident Reporting and Investigating Policy and Procedure*, to determine the cause of the incident. If this *Fall Protection Policy and Procedure* needs to be changed (new practices, procedures or training) to prevent similar incidents from occurring in the future, those changes are developed and implemented/trained as soon as possible.

Training

Re-training is accomplished by reviewing the contents of this Policy and Procedure with **affected** employees only, when deficiencies in training, work place changes, and changes that make previous training obsolete occur. Employees receive training in the recognition and elimination of fall hazards, and procedures used to eliminate, reduce, control and/or minimize fall exposures. Verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee successfully prepare a *Fall Protection Checklist* for a work situation based on a scenario and successfully completing a written test (see *Performance-Based Training* section). Training is recorded on the *Training Report* to reflect the training received, when the training was provided, who received it, and the signature of the instructor.

Recordkeeping

Performance-Based Training Fall Protection Checklists completed during the training session are attached to *Training Documentation* forms, placed in appropriate HSE files and maintained for two (2) years, then discarded.

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Standard: 29 CFR 1926.500 Fall protection

(a) General. (1) This section sets forth requirements for employers to provide fall protection systems. All fall protection required by this section shall conform to the criteria set forth in §1926.502 of this subpart. (2) The employer shall determine if the walking/working surfaces on which its employees are to work have the strength and structural integrity to support employees safely. Employees shall be allowed to work on those surfaces only when the surfaces have the requisite strength and structural integrity.

(a) Training Program. (1) The employer shall provide a training program for each employee who might be exposed to fall hazards. The program shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards. (2) The employer shall assure that each employee has been trained, as necessary, by a competent person qualified in the following areas: (i) The nature of fall hazards in the work area; (ii) The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used; (iii) The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used; (iv) The role of each employee in the safety monitoring system when this system is used; (v) The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs; (vi) The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection; and (vii) The role of employees in fall protection plans;

[Web address is www.gpoaccess.gov/ecfr; in **Browse**, scroll down to and click “Title 29 – Labor”; click “GO”; search and click **1926**; search and click **1926.1 to 1926.1152**; search and click “**Subpart M (1926.500) Fall protection**”.]

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Fall Protection Checklist

Location _____ Date _____

Person Supervising Fall Protection Procedure _____

Copy of Procedure on job site? (Yes/No) _____

System(s) used (check): Safety Monitoring _____ Controlled Access Zones _____ Personal Fall Arrest _____

Equipment required for work (check): Full Body Harness _____ With Lanyards _____ With Tie-Offs _____

Web-Retractable Lifelines _____ Self-Retractable Lifelines _____ Self-Locking Hooks _____ Rope _____

Other (List): _____

Situations/locations in which conventional systems cannot be used (describe): _____

Steps taken to reduce/eliminate fall hazards when non-conventional systems cannot be used (describe):

Has adequate protection from falling objects been provided? (Yes/No) _____ Describe _____

What other provisions have been taken to provide protection (Describe)? _____

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Has all equipment been inspected by Foreman? (Yes/No) _____

Has all equipment been issued to qualified employees? (Yes/No) _____

Have Kent Materials employees' required training and skills been verified? (Yes/No) _____

Has any training been provided at the job site? (Yes/No) _____

Describe _____

Has the job site been prepared and all equipment checked and re-checked (check)? Work Surfaces _____

Personal Lifting Equipment	Hoisting Equipment	Scaffolding	Leading Edges
_____	_____	_____	_____
Ramps	Runways	Walkways	Holes/Openings
_____	_____	_____	_____
			Lift Belt

Dangerous Equipment (Describe) _____

Employees working with fall protection (print names):

Comments:

Op Mgr. (signature)

Date

	Policies and Procedures	Issue 10-20-03
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	FIRE SAFETY: FIRE EXTINGUISHER	
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Purpose

The Fire Safety Policy and Procedure provides Kent Materials with a method to ensure employees and owner-operators understand how to use, maintain, inspect fire extinguishers, and prevent fires (29 CFR 1910.157).

Policy

It is the policy of Kent Materials (KM) to protect its employees, owner-operators and visitors from fires by providing equipment, prevention and training.

Procedure

At KM, fire safety is a major concern. There are two-work areas; interior (in buildings) and exterior (outside). Interior fire hazards are appliances (microwave, stove, heater, and electrical). Exterior fire hazards are chemicals, oils, and activities such as welding, burning and cutting. Supervisors ensure that good housekeeping and maintenance are followed to keep fire hazards to a minimum. En route fire hazards are associated with the heat generated by the motor carriers and materials transported.

Inspections

Fire extinguishers are selected and distributed based on the anticipated fire hazards in the workplace. Inspections are conducted on fire extinguishers monthly to verify they are in good working condition and in their designated positions, and are documented on the Fire Extinguisher Inspection form. Each driver visually inspects the extinguishers in their vehicle. Supervisors and HSE Manager visually inspect the extinguishers in their respective areas:

1. Verify that fire extinguishers are placed in their designated positions with no obstructions to visibility or access and markings and signs are properly placed and in good condition. Drawings of the Port Allen office and the shop office show the location of each extinguisher. Designated placeholders for fire extinguishers are located in the offices and in the shop. Common placement is as follows:

- Shop
- Shop office
- Shop warehouse
- Port Allen office
- Motor vehicles

NOTE: Extinguishers are placed roughly 50 feet apart throughout the facilities.

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2.

Inspect areas around facility for potential fire hazards and document the results of the inspection on the Fire Extinguisher Inspection form. Items to be aware of are:

- Oily towels, gloves, clothing, or paper material left in contact with or around heat producing equipment.
- Frayed wiring, missing receptacles, or exposed wiring that can cause an electrical fire.
- Containers of lubricant, or flammable/combustible liquids that are not properly stored.
- Spilled oils and flammable liquids that are not properly cleaned up.

3. Verify that the pin is in place and seal is not broken on each fire extinguisher.
4. Remove extinguisher from its holder and inspect the exterior shell of the extinguisher for damage or corrosion; examine the base carefully.
5. Examine the nameplate for readability and ensure that it has the U.L. rating, operating instructions, agent identification, hazard identification, blow down and restore instructions, and maintenance instructions.
6. Examine hose assembly including discharge hose, horn (for CO₂), hose connection, nozzle tip and operating lever for damage (clogged nozzle, cracked or worn hoses, or worn cylinder).
7. Read the pressure gauge needle/pointer to ensure registering in “green” area.
8. Inspect the place holder for corrosion and damage, and the bolts for looseness.
9. Inspect and mark the inspection tag (ensure inspection tag is attached and dated).
10. Supervisors and drivers contact HSE Manager to report any fire extinguishers found discharged, in poor condition, or improperly pressurized for maintenance or repair.

NOTE: Fire extinguishers are serviced by an approved fire extinguisher vendor. Vendor checks date on each fire extinguisher prior to servicing for hydrostatic testing. When date signifies that testing is required, vendor completes hydrostatic test. When extinguishers are removed from service for maintenance or recharge, equivalent protection is provided at the extinguisher location.

11. Quarterly, HSE Manager checks date on each facility fire extinguisher for hydrostatic testing and, if necessary, sends required fire extinguisher to the vendor for testing: carbon dioxide extinguishers are hydrostatic tested every five years and dry chemical extinguishers are hydrostatic tested every twelve years.

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12. Perform yearly maintenance check on each extinguisher and document and maintain the record for one year after the last entry or the life of the shell, whichever is less.

Analyze Fire Situations

1. Once a fire is detected, report the fire/sound the alarm/call for assistance. The alarm for fire is a verbal announcement (Yell!).
2. Decide to fight the fire or let it burn until the local fire department arrives by asking the following questions and making a decision on your answers:
 - a. How big is the fire?
 - Is the fire too big to handle?
 - b. What type of fire is it?
 - Class A –common combustibles (wood, paper)
 - Class B –flammable liquids (oil, diesel, etc.)
 - Class C –electrical
 - c. Is the required firefighting equipment and manpower available?
 - Are there enough fire extinguishers and trained people?
 - d. Is the fire being fed by a source that can be shut off (i.e., a gas pressure fire)?
 - Can it be shut off safely?
 - e. What is the best approach to extinguish the fire?
 - There is not a single best approach; a plan should be quickly determined by personnel fighting the fire.

Extinguish Fire

3. If decision is made to fight the fire, employees fighting the fire get the required equipment and prepare to extinguish it. Employees not fighting the fire proceed to the muster area or take directions from the “Head Count” person.

NOTE: Only persons trained in the use of fire extinguisher attempt to extinguish a fire.

4. Use the PASS method when extinguishing a fire in the incipient stage:
 - P –Pull the pin or other locking device.
 - A –Aim toward the base of the fire, upwind, from a distance of eight (8) feet.
 - S –Squeeze the trigger/lever to discharge the extinguishing agent.
 - S— Sweep the extinguisher back and forth while advancing toward the fire.

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5. Once fire is completely out, restore the area to its pre-fire condition and refill the discharged extinguishers.

6. After the location has been restored, critique the events leading up to, during, and after the firefighting; this is an opportunity to learn and improve fire safety and the firefighting process.

7. HSE Manager completes KM's Incident Report form and provides a copy to the Port Allen office for filing.

Alarms and Drills

At the shop and in the offices, a verbal announcement is used as the means to notify employees of an emergency. Fire drills are performed annually to keep awareness levels elevated for the safety of our employees and visitors. Drills resemble as closely as practicable a real emergency evacuation and include the following steps:

1. HSE Manager generates a written fire drill scenario by completing the following on a blank sheet of paper:

- Location of Fire _____
- What type of fire _____
- What size of fire _____
- Other applicable information _____

2. HSE Manager presents the drill scenario to any employee to initiate the drill, and observes and documents all observations made of the process during the drill.

3. Employee receiving the drill scenario makes a verbal announcement based on the scenario, preceded by the words: **THIS IS A DRILL.**

4. Employees perform roles and responsibilities according to the scenario and Fire Safety Policy and Procedure:

- Collect thoughts; if necessary; repeat **THIS IS A DRILL** when communicating fire information to other employees.
- Report emergency: dial ### and provide appropriate mock information.
- Analyze the situation and make a determination to either fight the fire or evacuate (see Analyze section).
- Retrieve fire-fighting equipment; simulate "fighting the fire".
- Assist where needed.

HSE Manager reports the observations made during the fire drill, then leads a discussion of the group to critique the Fire Safety procedure immediately after the drill. HSE Manager documents the drill and submits the Report to the Port Allen office for filing.

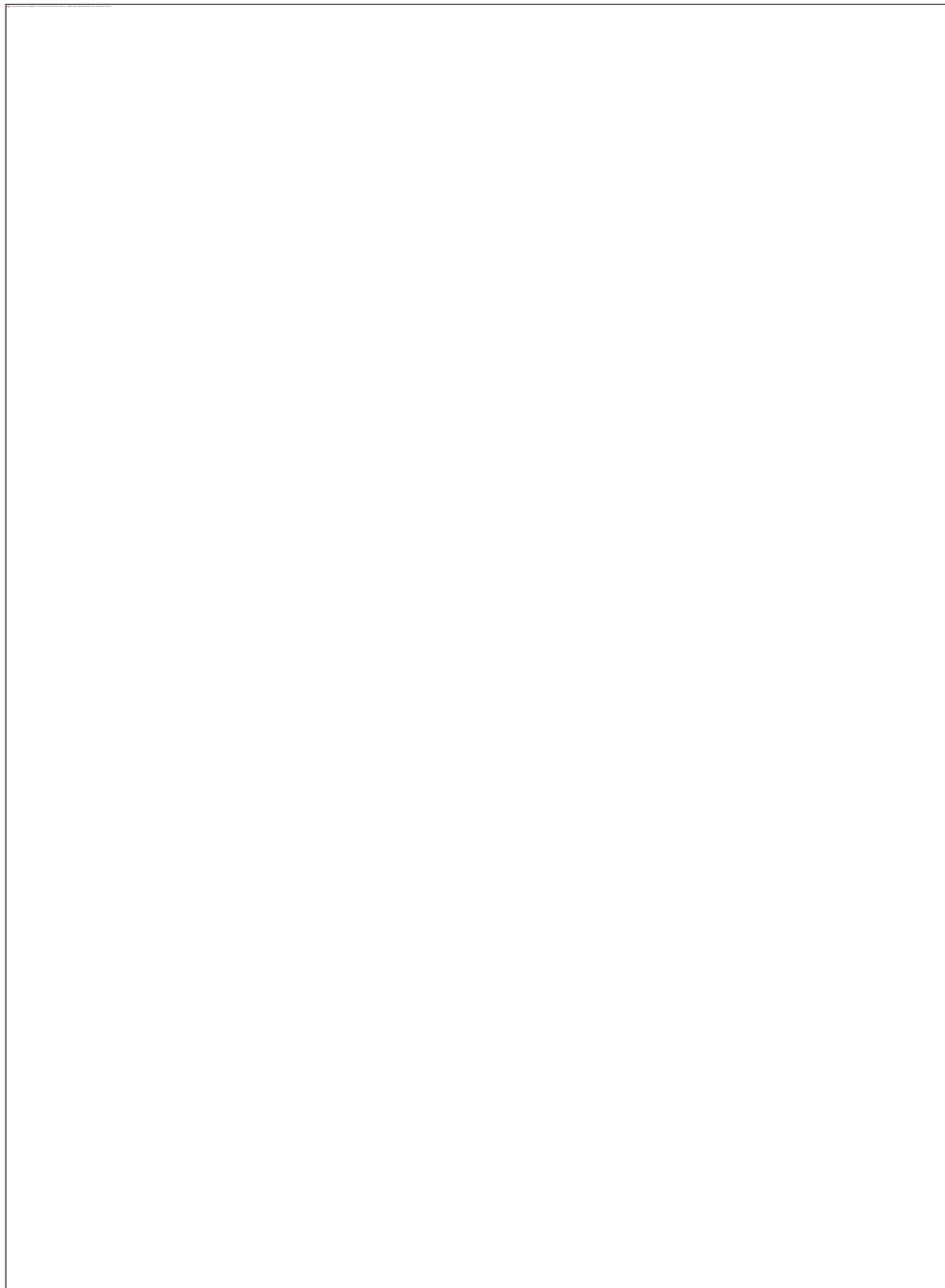
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Training

HSE Manager trains all affected employees initially and annually in the operation of the fire extinguishers, which extinguishers to use on what fire situations, and the hazards involved in incipient stage firefighting. HSE Manager conduct fire drills semiannually, then documents the training and drills, and sends copies to the Port Allen office for filing.

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FIRE EXTINGUISHER INSPECTION



Kent Materials	Policies and Procedures	Issue 1-6-04
	FORKLIFT	Rev. date 4/19/2011

Purpose

The Forklift Policy and Procedure provides Kent Materials (KM) with a means to ensure that competent persons safely operate and maintain its forklifts (powered industrial trucks).

Policy

It is the policy of Kent Materials that forklift operators be properly trained, certified and authorized before they operate KM's forklifts.

Procedure

The shop and yard employees are trained, certified and authorized to operate forklifts at KM facilities in the scope of their normal job responsibilities. Prior to forklift operation each day (at the yard), the operator must inspect the forklift (see *Operator's Daily Checklist* attached) to make sure that it is in good operating condition and its operation does not create an unsafe condition for the operator or other personnel working in the shop or yard. Once the inspection is complete, sign the Checklist and turn it in to your supervisor for him to sign. If the forklift is not in safe operating condition, notify your supervisor and have the problem corrected before it is operated. If the forklift and its equipment are determined to be in good condition and safe to operate, operation of the forklift begins.

1. Plan immediate lifts by determining the following:
 - a. What materials are to be lifted and where are they (rack, truck, ground, etc.)?
 - b. What is the weight of the heaviest lift and can this forklift safely lift it?
 - c. Will the load be stable and steady on the forks?
 - d. What is the overall height of the material once it is on the forks?
 - e. Will the operator's view be obscured while traveling with the materials?
 - f. What is the travel route? Is this the best route?
 - g. Is there sufficient lighting to ensure safe operation of the forklift?
 - h. What are the obstacles between the materials and where they will be placed: power lines, piping, equipment, vehicles, trenches, uneven roadway, people, etc.?
 - i. What are the best approach directions for proper lifting and placing the materials?
2. Prepare forklift for operation:
 - a. Spread the forks to accommodate the materials to be lifted: pallets, pipe, etc.
 - b. Start the forklift engine and allow time for the engine to warm up.
 - c. Test the hydraulic controls by raising and lowering the forks, tilting the mast back and forward, and driving it in forward and reverse a short distance.
 - d. If applicable, fasten your seat belt.

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3. Approach first lift slowly from the proper approach direction:
 - a. Make sure no one is in your travel route.
 - b. Travel with the forks about eight (8) inches above the ground/road surface.
4. Move materials:
 - a. Place the forks under the lift as far as possible.
 - b. Slowly raise the forks until the material is about eight inches above the surface.
 - c. Tilt the mast back slightly to stabilize and steady the material against the mast; ensure the weight is evenly distributed.
 - d. Turn and ensure that no one or no vehicle is behind the forklift.
 - e. Slowly back up until the forklift is clear of other material and obstacles.
 - f. Slowly drive forward to the location where the material is to be placed.

Note: If view is obstructed, drive backwards to the location.

- g. Properly position the forks and lower the lift until the material rests on the surface.
- h. Tilt the mast forward slightly and raise the forks slightly.
- i. Turn and ensure that no one or no vehicle is behind the forklift.
- j. Slowly back up until the forks are clear of the material.
- k. Repeat steps #3 and #4 until all of the materials have been moved.

5. Park forklift, lower the forks to the surface, and shut off the engine.

Each time the forklift is needed to move materials, repeat all of the steps of this procedure to ensure the safety of the operator as well as the safety of fellow employees, contract personnel, and machines and equipment found at the workplace.

Stingers and fabricated extenders are used to extend the reach or length of the forks. Extenders are used in the same manner with only the weight and placement of the load recalculated. Placement is not necessarily in the center of the extender but rather closer to the back of the forks to keep from raising the back end of the forklift off the ground.

All repairs and maintenance are performed by trained and authorized personnel in an environment free of chemical, vapor, and/or liquid hazards. Authorized personnel servicing equipment disconnect the battery when working on the forklift's electrical systems. Repairs to the fuel and ignition systems involve a fire hazard and are conducted in designated locations.

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	FORKLIFT	Rev. date 4/19/2011

Safety Precautions

The following are safety items extracted from the standard to ensure that KM employees are safe when using, maintaining and working with powered industrial trucks (forklifts):

- The forklift is used only in atmospheres allowed by the standard; only diesel operated (D) forklifts are authorized to be operated in the KM yard and shop.
- The storage and handling of diesel is in accordance with NFPA Flammable and Combustible Liquids Code (NFPA No. 30-1969).
- Battery charging installations are located in areas designated for that purpose.
- Facilities are provided for flushing and neutralizing spilled electrolyte, for fire protection, for protecting charging apparatus from damage by trucks, and for adequate ventilation for disposal of fumes from gassing batteries.
- Smoking is prohibited in the charging area.
- Precautions are taken to prevent open flames, sparks, or electric arcs in battery charging areas.
- Tools and other metallic objects are kept away from the top of uncovered batteries.
- Trucks are not driven up to anyone standing in front of any fixed object.
- Persons are not allowed to stand or pass under the elevated portion of any truck, whether loaded or empty.
- Arms and legs are prohibited from being placed between the uprights of the mast or outside the running lines of the truck.
- If a truck is left unattended, load engaging means are fully lowered, controls are neutralized, power is shut off, and brakes set.
- Fire aisles, access to stairways, and fire equipment are kept clear.
- All traffic regulations are observed.
- The driver is required to slow down and sound the horn where vision is obstructed.
- The driver is required to look in the direction of, and keep a clear view of, the path of travel.
- Grades are ascended or descended slowly.
- Trucks are operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay is not permitted.
- Running over loose objects on the roadway surface are avoided.
- Fuel tanks are not be filled while the engine is running.
- Spillage of oil or fuel are carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.
- Trucks are not operated with a leak in the fuel system.
- Open flames are not be used for checking electrolyte level in storage batteries or diesel levels in fuel tanks.

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	FORKLIFT	Rev. date 4/19/2011

Training

Training is conducted by Pure Safety or the HSE Manager who certifies employees to operate the forklifts at the shop and yard facilities. Training consists of a combination of formal instruction (lectures, discussion, testing, etc.), practical training (demonstrations and practical exercises), and an evaluation of the operator's performance in the workplace (where the employee actually operates the unit). Trainees operate a forklift only under "direct" supervision of a trained and certified operator and in a manner where operation does not endanger the trainee or other employees. The HSE Manager or Location Manager provides initial training in the following topics for each type of forklift:

Forklift-related topics:

- operating instructions, warnings, limitations and precautions;
- difference between a forklift and an automobile;
- controls and instrumentation; operation; steering, maneuvering and visibility;
- fork and attachment adaptation, operation and use limitations;
- forklift capacity, stability, inspection and maintenance;
- and other operating instructions, warnings, and precautions listed in the operator's manual for the forklift.

Workplace-related topics:

- Surface conditions; composition of loads;
- load manipulation, stacking and un-stacking; pedestrian traffic;
- other restricted places; hazardous (classified) locations;
- ramps and other sloped surfaces;
- closed environments and other areas without proper ventilation or poor forklift maintenance;
- and other unique or potentially hazardous environmental conditions in the workplace that affect safe operation.

Refresher training in the form of a performance evaluation and knowledge test is conducted at least once every three (3) years to ensure the operator maintains the knowledge and skills required to operate the powered industrial truck (forklift) safely. Refresher training is also conducted when an operator is observed operating the forklift in an unsafe manner, is involved in an incident, or if conditions in the workplace change in a way that affects safe operations. The documentation of the training and refresher training is kept at the Port Allen office.

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	FORKLIFT	

Operator's Daily Checklist

Forklift No:	Date:	Yard:	Rig Name:
Operator Name:		Supervisor Name:	
Operator Signature:		Supervisor Signature:	
Hour Meter Reading: Start of Day End of Day Hours of Day			
Visual Checks	Yes	No	NA
Obvious damage and leaks			
Tire condition good			
Battery plug condition (be sure battery plug connection is tight)			
Head and tail lights operating properly			
Warning lights operating properly			
Hour meter operating properly			
Other gauges and instrumentation working properly			
Battery discharge indicator (with key on, needle should indicate in green area)			
Operational Checks			
Horn operating properly			
Steering working properly			
Brakes_working_properly;_no_squealing_sounds			
Battery load test (watch battery indicator while holding mast tilt lever on full back tilt)			
Parking_brakes_operating_properly			
Seat belt operating properly			
Hydraulic controls operating properly			

Remarks: Explain All Items Needing Attention or Repair _____

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	HAND AND POWER TOOLS/MACHINERY	Rev. date

The Safety Administrator shall ensure that employees are trained in the proper selection of the tools or equipment for their specific jobs. The training shall include instructions on inspection and testing of tools and equipment before they are used on the job . . . Each power tool should come with a manufacturer's product manual that will cover "safety procedures- for that particular power tool. Strong emphasis shall be placed on good maintenance, which is just as important for hand tools as it is for power equipment some equipment must be overhauled regularly, with replacement of parts subject to the most wear.

General Tool Safety Precautions

Each employee must be aware of the following:

1. Inspect the tool before each use.
2. Know the application, limitation and potential hazards of the tools used.
3. Select the proper tool for the job.
4. Remove adjusting keys and wrenches before turning on power tools.
5. Do not use power tools with frayed cords or loose or broken switches.
6. Keep guards in place and in working order.
7. Have ground prongs in place or use power tools marked "double insulate&".
6. Maintain working areas free of clutter.
9. Keep alert to potential hazards in the working environment such as damp locations or the presence of highly combustible materials.
10. Dress properly to prevent loose clothing from getting caught in moving parts.
11. Use safety glasses, dust or face masks, or other protective clothing and equipment when necessary.
12. Do not surprise or distract anyone using a power tool.
13. Tools shall be kept clean and in good working order.

The Company and its employees have a responsibility to work together to establish safe procedures. If a hazardous situation is encountered, it shall immediately be brought to the attention of the supervisor or Safety Administrator.

Non-Powered Hand Tools

Hand tools are non-powered. They include anything from axes to wrenches. The greatest hazards posed by hand tools result from misuse and improper maintenance.

1. If a wooden handle on a tool such as a hammer or an ax is loose, splintered, or cracked it must not be used because the head of the tool may fly off and strike the user or another worker.
2. A wrench must not be used if its jaws are sprung because it might slip.
3. Impact tools such as chisels, wedges, or drift pins are unsafe if they have mushroomed heads because the heads might shatter on impact, sending sharp fragments flying.
4. The Supervisor has overall responsibility for the safe condition of tools and equipment used by employees, but the employees have the responsibility for using and maintaining tools properly and informing the Supervisor of tools/equipment that need repair.
5. The Safety Administrator shall caution employees that saw blades, knives or other tools be directed away from aisle areas and other employees working in close proximity. Knives and scissors must be sharp. Dull tools can be more hazardous than sharp ones.
6. Supervisors shall require that floors be kept as clean and dry as possible to prevent accidental slips with or around hand tools.
7. Around flammable substances, sparks produced by iron or steel hand tools can be a dangerous ignition source. Where this hazard exists, spark-resistant tools made from brass, plastic, aluminum or wood will be provided for safety.

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Cheater Pipes

1. Cheater pipes should be less than twice the length of the wrench handle.
2. Cheater pipes should closely fit the entire length of the wrench handle.
3. Do not jump, hammer or push on cheater to break connections

Power Tool Precautions

Power tools can be hazardous when improperly used. There are several types of power tools, based on the power source they use; electric, pneumatic and hydraulic. Employees shall understand potential hazards and safety precautions to prevent those hazards from occurring.

The following general precautions shall be observed by employees using power tools:

1. All power tools must be grounded. Personnel should make sure that all portable power tools are equipped with a three-prong grounded conductor cord.
2. Electrically powered tools should not be used where gas or fuel-vapors exist.
3. Never carry a tool by the cord or hose.
4. Never yank a cord or hose to disconnect the tool.
5. Keep cords and hoses away from heat, oil and sharp edges.
6. Disconnect tools when not in use, before servicing and when changing accessories such as blades, bits and cutters.
7. All observers shall be kept at a safe distance from the work area.
8. Secure work with clamps or a vise, freeing both hands to operate the tool.
9. Avoid accidental starting. The worker shall not hold a finger on the switch button while carrying a plugged-in tool.
10. Tools shall be maintained with care. They shall be kept sharp and clean for the best performance. Follow instructions in the user's manual for lubricating and changing accessories.
11. Be sure to keep good footing and maintain good balance.
12. The proper apparel (no loose clothing) shall be worn. Ties or jewelry shall not be worn by the operator of power tools as they can become caught in moving parts.
13. All portable electric tools that are damaged shall be removed from service and tagged "Do Not Use".

Pneumatic Tools

Pneumatic tools are powered by compressed air. There are several dangers encountered in the use of pneumatic tools. The main danger is getting hit by one of the tool's attachments or some type of fastener the worker is using with the tool. Pneumatic tools are preferred in flammable vapor environments. The Safety Administrator shall ensure that the following precautions are observed relating to these tools:

1. Pneumatic tools that shoot nails, rivets or staples, and operate at more than 100 pounds per square inch, must be equipped with a special device to keep fasteners from being ejected unless the muzzle is pressed against the work surface.
2. Eye protection is required and face protection is recommended for employees working with pneumatic tools.
3. Noise is another hazard. Working with noisy tools such as jackhammers requires proper, effective use of ear protection. (See "Personal Protective Equipment" - Hearing Protection section for further information.)
4. Employees must check to see that the pneumatic tools are fastened securely to the hose by a positive means to prevent them from becoming disconnected. A short wire or positive locking device attaching the air hose to the tool will serve as an added safeguard.
5. Airless spray guns which atomize paints and fluids at high pressures must be equipped with automatic or visual manual safety devices if manually released.
6. If an air hose is more than one-half inch in diameter a safety excess flow valve must be installed at the Source of the air supply to shut off the air automatically in case the hose breaks.

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7. In general, the same precautions for air hoses shall be taken that are recommended for electric cords since the hose is subject to the same kind of damage or accidental striking and could present a tripping hazard.
8. A safety clip or retainer must be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel.
9. Screens must be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers or air drills.
10. Compressed air guns shall never be pointed toward anyone. The user shall never dead-end it against him or herself or anyone else.
11. Heavy jackhammers can cause fatigue and strains; heavy rubber grips reduce these effects by providing a secure handhold.

Hydraulic Power Tools

Hydraulic tools are powered by pressurized liquids. As in the case of pneumatic tools, dangers may be encountered in their use. The principal danger is being hit by one of the tool's attachments or some part of fastener the worker is using with the tool.

1. The fluid used in hydraulic power tools must be an approved fire-resistant fluid and must retain its operating characteristics at the most extreme temperatures to which it will be exposed.
2. The manufacturer's recommended safe operating pressure for hoses, valves, pipes, filters and other fittings must not be exceeded.

Grinders and Grinding Tools

1. Goggles shall always be worn when using grinding tools.
2. The side of a grinding wheel shall never be used unless designed to do so.
3. The work rest for a grinder should be no more than **118"** from the wheel and tongue guard at all times.
4. The tool back stop should be no more than ¼" from **the** wheel.
5. Do not attempt to adjust the guards or rests while the wheel is in motion.
6. Wheels shall only be maintained and replaced by experienced persons.
7. Do not leave a grinder unattended while the wheel is in motion.
8. Ensure that the proper speed is set when wheels are replaced. (All maintenance and replacement shall be done by an experienced person.)

Guards

Hazardous moving parts of a power tool need to be safeguarded. For example, belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains or other reciprocating, rotating or moving parts of equipment must be guarded if such parts are exposed to contact by employees. Safety guards must never be removed or made inoperative unless performing repair work or maintaining the guarded piece of equipment.

Extension Cords

1. Extension cords shall be used only as temporary connections. All other electrical connections should be made permanent by proper construction methods.
2. All extension cords shall be grounded by a three-pronged plug and should be explosion proof if used in confined spaces or spaces that may contain flammable gases.
3. Cords should not exceed 50 feet in length and shall be equipped with a three-pronged connector.
4. Damaged cords shall not be used and if repairable, shall be repaired by a qualified electrician.
5. Cords should be kept out of aisles and other floor traffic as well as wet areas or areas where chemicals are used.

Kent Materials	Policies and Procedures	Issue 8/2003
	HAZWOPER	Rev. date 4/19/2011

Purpose

The Hazardous Waste Operations and Emergency Response (HAZWOPER) Policy and Procedure provides Kent Materials (KM) with a means to ensure that our employees provide prompt and competent response to all spills and/or releases when an incident occurs in the workplace.

Policy

It is the policy of KM that our employees and owner-operators are safe when responding to a spill or release of hazardous substances and that our employees and owner-operators remain safe until the spill or release is safely handled and operations are restored to normal.

Procedure

The KM *Contingency Plan* meets the requirements of the *Emergency response plan* identified in 29 CFR 1910.120(q)(1) and addresses the *Elements of an emergency response plan* identified in 29 CFR 1910.120 (q)(2); please refer to this document for information concerning emergencies. If a hazardous substance is spilled/released at the customer's location, on a highway, or in the yard, our employees and owner-operators are trained to respond with quick, safe and appropriate actions. Employees and/or owner-operators near to the spill/release protect themselves and communicate the emergency to others. Other employees and owner-operators protect themselves and take the appropriate steps to protect others. The incident command system is manned with senior employees to manage the situation to halt any further release or clean up the spill until the proper hazardous material handling personnel arrive.

1. Employee and owner-operator detecting spill or release *immediately* communicates a description of the spill or release to his/her Supervisor.
2. If in the yard, Supervisor *immediately* alerts all personnel of the emergency or the suspected emergency and directs them to a safe muster area to decide how to respond.
 - Supervisor decides there is *no emergency* after considering all of the evidence, restores everything to normal, and records the incident on one of the daily reports.
 - Supervisor determines the emergency is *serious* (a toxic release, a caustic spill, a major fire, etc.); if it is, all personnel evacuate the site and the Supervisor calls the appropriate agencies and response organizations on the *Emergency Response Telephone List* and/or *Notification Telephone List* (see attached) and lets them handle it from this point forward.

Note: Supervisor may have to personally see “emergency” situation before making any determinations.

3. If the spill or release is an emergency to which there is a safe response, the Supervisor immediately initiates KM's *Spill Response Plan* and:
 - a. assumes the position of individual-in-charge (PIC) of the site-specific incident,
 - b. announces to all at the site that he will coordinate all emergency responses and communications until further notice,

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- c. identifies all hazardous substances and/or conditions present regarding the spill or release,
- d. considers site analysis, use of engineering controls, maximum exposure limits, hazardous substance handling procedures, and any other techniques to control the emergency,
- e. if necessary, contacts HSE Manager for assistance to identify and evaluate hazards and to provide direction with respect to the safety of operations for the emergency at hand,
- f. takes any actions needed to correct hazards if HSE Manager judges that activities are IDLI-1 or involve an imminent-danger condition,
- g. limits the number of emergency response personnel at the emergency site to those who are actively performing emergency operations (always use the *Buddy System*).
- h. assures that all personnel wear PPE appropriate for the hazards to be encountered, including proper firefighting equipment and protection and respiratory protection equipment.
- i. implements appropriate emergency operations from the *Spill Response Plan*.
- j. if necessary designates standby personnel with equipment ready to provide assistance or rescue.

4. If practicable and safe, qualified employees and/or owner-operators attempt to stop the spilling or releasing (closing a valve, tripping a relay, plugging a hole, or some other action that does not put the employee and/or owner-operator in an unsafe situation or create another unsafe, hazardous condition) **ONLY** to the level of their training.

5. When practicable, Supervisor calls HSE Manager at (337) 289-0020, describes the situation and actions taken, and answers any questions.

6. HSE Manager contacts the respective agencies and response organizations, based on the emergency, unless the Supervisor is not able to reach HSE Manager; the Supervisor calls the agencies and response organizations using the *Notification Telephone List*.

7. Supervisor completes the *Spill Response Notification Form* (see *Spill Response Plan*) and submits it to the HSE Manager for review and handling; a copy of the form is placed in the files at the site location where the emergency occurred.

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Employees and/or owner-operators who exhibit signs or symptoms of exposure to hazardous substances during the course of an emergency, either immediately or subsequently are provided with medical consultation at their convenience. Personnel who are skilled in the operation of certain equipment, and who are temporarily needed to perform immediate emergency support work, and who are exposed to the hazards at an emergency response scene, are not required to meet the training requirements similar to KM other employees and/or owner-operators who are expected to be involved in emergency response. However, these personnel are given an initial briefing at the site prior to their participation in any emergency response, and include instruction in the wearing of appropriate PPE, the chemical hazards involved, and what duties are to be performed, as well as other safety and health precautions provided to KM employees involved in emergency response.

Training

Training is based on the duties and functions to be performed by each emergency responder. Some KM employees are not involved in emergency response beyond detecting and reporting a spill or release, and are required to complete First Responder Awareness Level training, or have proven experience relating to emergency response, of the following items to achieve and demonstrate competency:

- An understanding of what hazardous substances are, and the risks associated with them in an incident.
- An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
- The ability to recognize the presence of and identify the hazardous substances in an emergency.
- An understanding of the role of the first responder awareness individual in the KM emergency response plan (*Spill Response Plan*), including site security and control.
- The ability to realize the need for additional resources, and to make appropriate notifications to KM Management.

The awareness level of training is accomplished by the HSE Manager; review this Policy and Procedure and the KM *Spill Response Plan*, and present the items above to the employee. If the employee demonstrates sufficient knowledge and skill of the emergency response applications within KM's operations, the instructor documents the information on the *Implementation and Training Documentation Form* and submits it to the Office Manager. The information contained in the Hazard Communication Policy and Procedure is the same as some of the items presented here, and need not be trained twice.

A sufficient number of employees and owner-operators are trained so that they are available at all times to respond to releases or potential releases for the purpose of stopping the spill or release as Hazardous Material Technicians. These employees assume a more aggressive role (plug a hole, close a valve, stop the spill or release) than a first responder at the operations level. Technicians receive at least 24 hours of training equal to the First Responder Awareness Level training and the following items to achieve and demonstrate competency:

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- Knowledge of the basic hazard and risk assessment techniques.
- Know how to select and use proper PPE provided to the first responder operational level.
- An understanding of basic hazards materials terms.
- Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and PPE available with their unit.
- Know how to implement basic decontamination procedures.
- An understanding of the relevant standard operating procedures and termination procedures.
- Know how to implement the KM emergency response plan (*Spill Response Plan*).
- Know the classification, identification and verification of known and unknown materials by using field survey instrument and equipment.
- Be able to function within an assigned role in the Incident Command System.
- Know how to select and use proper specialized chemical PPE provided to the hazardous materials technician.
- Understand hazard and risk assessment techniques.
- Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and PPE available.
- Understand and implement decontamination procedures.
- Understand termination procedures.
- Understand basic chemical and toxicological terminology and behavior.

The Hazardous Materials Technician Level of training is accomplished by an outside training organization; the instructor reviews this Policy and Procedure and the KM *Spill Response Plan*, and presents the training items above to each employee receiving this training. If the employee demonstrates sufficient knowledge and skill of the emergency response applications within KM's operations, and the instructor documents the information on the *Training and Documentation* form and submits it to the Office Manager.

Refresher Training

Those employees and owner-operators who are trained according to the levels mentioned above receive annual refresher training of sufficient content and duration to maintain their competency, or demonstrate their competency in those areas at least annually (without completing the annual training). KM keeps a record of the methodology used to demonstrated competency if the employee is not refresher-trained.

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EMERGENCY RESPONSE PHONE LIST

Management should be contacted as soon as is practicable after the emergency is detected.

Managers or Supervisors	Business Numbers	Cell Phone Numbers
Steve Kent	225-930-4512	225-937-0434
Gerard Smith	225-930-4512	225-278-6984
Brad Antae	225-930-4512	225-235-0711
SMS HSE Mgr.	225-930-4512	

NOTIFICATION PHONE LIST

It is important that the notification process not be delayed if someone else is available.

Agency/ Personnel	Phone Number	Person to Contact or Comments
National Response center (NRC)	1-800-424-8802	
Fire Department	911	
Local Police	911 or 225-389-5000	
State Police	225-925-6595	
LA Department of Environmental Quality	225-763-3908	
Poison Information Center	800-256-9822	
Safety Management Systems	337-289-0020	Courtney Juneau or Jack Trail

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Policy

It is the policy of Kent Materials (KM) that its employees know about the potential adverse effects of work-related noise, and that employees wear the proper hearing protection to prevent hearing loss. It is also the policy of KM Industrial Insulators to require all employees to wear hearing protection whenever working around noise generators (especially at customers' locations).

Procedures

The procedures and related information that follow describe the processes for effectively implementing the written Hearing Conversation program within KM. KM Management is responsible for informing its employees of annual noise monitoring, and the effects and purpose, selection, fitting, use and care of proper hearing protection. KM Management is also responsible for the training of their employees, and the proper documentation of the various aspects of the hearing conservation program.

Noise Monitoring

OSHA 1910.95 and the associated Appendices (especially Appendix C) identify the requirement to determine if noise exists in the workplace, the levels to which this noise exists in the area around the noise generators, and if people working in and visiting the workplace are at risk of this exposure to the level of 85 decibels (dB) or greater for an 8- hour time-weighted-average (TWA).


A Noise Survey Report is generated annually (as necessary), identifying the noise generating equipment and machinery, the decibel readings, the required hearing protection, and how long employees are allowed to work at a particular location without wearing any hearing protection. If the results of the Report indicate employees no longer have noise exposures, the monitoring process is discontinued until a change in a noise level occurs. The Report is posted in the workplace and the results are reviewed during a safety meeting shortly after the survey (see most recent *Noise Survey Report*). At the present time, KM **does not have noise levels above the 8-hour TWA.**

However, hearing protectors are worn by all employees at any client property and/or on any jobsite where warning signs (similar to the one below) are posted and/or where the sound level is known to be 85 dB or higher.

Parts of the ear:



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1. Outer Ear - The Sound waves are funneled into the ear canal and strike the eardrum. The eardrum vibrates in response to the sound waves.

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2. Middle Ear - The vibrations of the eardrum are amplified by the middle ear bones.

3. Inner Ear - The amplified vibrations establish fluid pressure waves within the cochlea, where the resulting motion of thousands of sensory hair cells leads to the generation of electrical impulses.

4. Central Auditory Nervous Stem - The auditory nerve transmits the electrical impulses to the brain, where they are decoded into the sensation we call "hearing".

Hearing by Air and Bone Conduction

Air conduction is the transmission of sound through the outer and middle ears, then to the cochlea, as just described. **Bone conduction** is the transmission of sound through the skull. The inner portion of the ear canal, the middle ear and the inner ear are encased in skull bone structures which vibrate in response to the impact of sound waves upon the head. As the following diagram shows, the cochlea can be stimulated by direct skull bone vibration and indirectly by skull bone-induced motion of the eardrum and middle ear bones.

In normal hearing, the auditory system simultaneously conducts sound by air and bone conduction. Two significant points are:

- In methods, cochlea and the auditory nerve. Permanent!
- Air conduction is the primary hearing method in individuals with normal hearing. As long as inner ear function is not impaired, hearing continues by bone conduction when the air conduction pathway is blocked by a hearing protection device.

Hearing Perceptions vs Sound Dimensions

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Sound sources emit sound waves with measurable frequencies and intensities. The unit of sound wave frequency is the Hertz (abbreviated Hz). Sound wave frequency is perceived as **pitch**; how high or low one sound is heard relative to another. Although the human ear may be sensitive to frequencies ranging from 20 Hz (lowest pitch) to 20,000 Hz (highest pitch), the 500-3000 Hz range is most critical for understanding conversational speech.

Sound wave intensity is perceived as **loudness**. In general, the more intense the sound, the louder it is heard. The decibel (dB) scale is a measure of intensity that takes into account that the loudest perceived sounds are several billion times more intense than the faintest perceived sounds.

The table below relates the decibel scale to familiar environmental sound sources. Since each 10-decibel increase in noise level represents a tenfold increase beyond the previous level's sound intensity, the pressures exerted on the ear by sounds at the high end of the scale are tremendously more intense than those at the low end of the scale. If sound can break glass, what will prolong exposure to high sound pressure levels (90- dB and above) do to the microscopic sensory hair cells of the inner ear? It will destroy those hair cells one by one — and like most nerve cells, they can never be replaced!

Environmental Example	dBs	Environmental Example	dBs
Rockets launching	180	Crane (idle)	93
Jet aircraft	140	Glycol rebuilder	93
Gunshot blast	140 ****	Printing press	90***
Pneumatic rock drill	130	Average factory	85
Automobile horn	120 ***	Very loud speech	85 *
Sandblasting	112	Triplex electric pump (enclosed)	82
Generator package	112	Noisy restaurant	80
crane (full throttle)	110	Heavy traffic	75
HP well manifold	100	Typical conversational speech	65
Woodworking shop	100	Average home	50
Boiler shop	100	Quiet Office	40
Hydraulic press	100	Birds singing	40
Punch press	100	Whisper	35
can manufacturing plant	100	Leaves rustling	20
Quint-plea hydraulic pump	95	Hearing threshold	0

Note: The dB levels with asterisks (*) represent the minimum noise level needed to produce the reactions noted below:

*85dB: Long exposure to noise **may** lead to hearing loss.

**90dB: Long exposure to noise will lead to hearing loss.

***120dB: Discomfort felt.

****140dB: Pain felt.

Noise and Hearing Loss

The effects of noise on hearing and hearing loss are identified below, along with some interesting facts relating to noise and hearing protection.

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- Occupational hearing loss results from two causes: acoustic trauma (a blow to the head) and excessive noise.
- Excessive noise not only causes a loss of hearing ability, but also increases mental and physical fatigue, anxiety, and irritability.
- Effects of hearing loss include your ability to listen selectively, your ability to understand conversational speech, a threat to safe working conditions, and a decrease in personal productivity.
- Discomfort usually occurs at sound levels of 120 dB; pain at 140 db.
- Progressive hearing loss results after long-term exposures to 90 dB or more.
- Noise-induced hearing loss is usually permanent and is always preventable.

Each type of hearing protection has advantages and disadvantages:

- Advantages of ear plugs: comfort; small size; customized fit.
- Advantages of ear muffs: uniform noise reduction capabilities; fit not so critical; prevents physical injury to outer ear; ease of supervision.
- Disadvantages of ear plugs: hygiene problems; easily lost/forgotten; difficult to supervise.
- Disadvantages of ear muffs: large size and bulk; electrical shock due to metal parts; easily abused; localization of sound.

Note: Constant exposure to excessive noise does not “toughen” your ears; the ears “go deaf”.

Hearing Protection Attenuation

KM conducts and evaluates noise surveys annually to determine the hearing protection attenuation it requires for the specific noise exposures using the evaluation method described in 1910.95 Appendix B (iii). The first step is to determine the person’s 8-hour TWA-equivalent decibel reading, if the person works more than 8 hours per day.

Example: noise reading 105 dB; person averages 12-hour work days

1. Divide average number of hours worked per day by 8 hours (standard) to get 8-hour TWA-equivalent (i.e., $12 \div 8$)
2. Multiply actual average exposure hours per day (i.e., 4 hrs.) times 8-hour TWA-equivalent (1.50 hrs. x 4 hrs.)
3. Using table below, determine adjusted decibel reduction for exposure time (i.e., 6.00 is between 8 and 4 on table)
4. Subtract reduction from actual noise reading (105—5 dB)

= 1.50 hrs. = 6.00 hrs.

= 5dB = 100dB

Actual Exposure Hours	16-8	8-4	4-2	2-1	144	¼-¼
TWA Reduction of dB	0	-5	-10	-15	-20	-25

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This (100 dB) is the **8-hour TWA** decibel reading for a person working an average of 12 hours and experiencing noise exposure for an average of 4 hours each work day. With this information, you can determine whether or not **your** hearing protection provides adequate attenuation to protect personnel from hearing loss.

Example: your hearing plugs have a Noise Reduction Ratio (NRR) of ‘33’

1. Obtain 8-hour TWA (adjusted for exposure time; see above) = 100 dB
2. Subtract 7 dB (constant) from NRR (33) of protector $(33 - 7) = 26$
3. Divide result by 2 to provide 50% safety factor $(26 \div 2) = 13$
4. Subtract result from noise TWA $(100 - 13)$; your attenuation is = **87dB**

Noise attenuation must be **greater than 85 to provide protection from hearing loss**; since it is 87, an NRR of 33 is not adequate to provide protection. You would need a higher NRR or have fewer hours exposed to the noise during the work day.

Selection, Fit Use and Care

KM does not have information regarding noise levels at clients’ locations; however, hearing protection with an NRR of 30 or more is probably sufficient at most facilities. These plugs protect against hearing loss through *air conduction*.

1. Instruction for inserting ear plugs is found on package (unless ear plugs are custom-fitted):
 - a. twist plug until compressed and narrow with a point;
 - b. select ear and hold in hand on same side as selected ear;
 - c. reach over head with other hand and grab and pull up on top of ear to open passageway;
 - d. place plug into ear point first;
 - e. release and allow to untwist and expand until it conforms to interior shape of ear;
 - f. repeat process for other ear using similar process; and
 - g. test by speaking normally (voice should sound muffled).
2. Examine ear protectors before each use.
3. If there is noticeable damage, or if material is hard or brittle, replace protector.
4. If ear protectors are used more than once, clean after every use (usually daily) using soap and water (or some other mild solution such as alcohol) to remove wax and/or dirt and bacteria; rinse thoroughly.
5. Allow protector to dry completely before using again.

Note: Never attempt to repair ear protectors; always replace them.

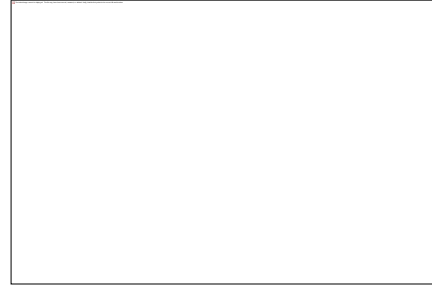
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Ear muffs protect against hearing loss through *air conduction* and *bone conduction*. In selecting and inspecting ear muffs, the employee observes the “noise reduction rating” NRR on the package: the higher the rating, the better the protection. Earplugs are reusable; employees wash their hands thoroughly before handling ear muffs.

1. When donning ear muffs, adjust the band connecting the muffs and try the fit (repeat) until each muff fits completely and comfortably over each ear with an air tight seal; if the seal is not air tight, the noise reduction rating is nullified.

2. Clean after every use using soap and water or mild disinfecting solution to remove the wax, dirt and/or bacteria; rinse thoroughly and allow to dry.

3. Examine hearing protection before each use; if there is noticeable damage, or if the material is hard or brittle, replace the ear muff.



Earplugs can be worn in addition to ear muffs to obtain a greater level of hearing protection when working in a high noise area.

Testing

If it is determined that KM has noise generation equipment to which its employees are exposed, and must develop and implement a complete Hearing Conservation program, KM will accomplish the following:

- Establish and maintain audiometric testing program as required by standard; program and hearing protectors provided at no cost to employees.
- Within 6 months of employee’s first exposure at or above action level,
 - o establish a valid baseline audiogram against which subsequent audiograms can be compared.
 - o test employees to establish a baseline audiogram, preceded by at least 14 hours without exposure to workplace noise.
 - o notify employees of need to avoid high levels of non-occupational noise exposure during 14-hour period immediately preceding examination.
- At least annually after obtaining baseline, obtain new audiogram for each employee.
- Compare each employee’s annual audiogram to that employee’s baseline to determine if audiogram is valid and if standard threshold shift has occurred.
- If annual audiogram shows employee has suffered standard threshold shift, retest within 30 days and consider results of retest as annual audiogram, and use of hearing protection is re-evaluated and/or re-fitted.
- If comparison of annual audiogram to baseline indicates a standard threshold shift has occurred, inform employee in writing within 21 days of determination.

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Training

Training is accomplished by reviewing the contents of this Policy and Procedure with all affected employees when first hired and annually thereafter. Verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee demonstrate the proper procedure to don and duff hearing protection and successful completion of a written test (see *Performance-Based Training* section). Training is recorded on the *Training Report* to reflect the training received. Information contained in this Policy and Procedure is updated to remain consistent to changes in PPE and work processes. Copies of the noise exposure procedures are made available to employees during training and are posted in the work area.

Recordkeeping

- *Noise Surveys* are placed in appropriate HSE files and maintained for two (2) years or until the next Survey is performed, then discarded.
- *Performance-Based Training Tests* completed during the training session are placed in appropriate HSE files and maintained for two (2) years, then discarded.

Standard: 29 CFR 1910.95, Occupational noise exposure

(c) Hearing conservation program. (1) The employer shall administer a continuing, effective hearing conservation program, as described in paragraphs (c) through (o) of this section, whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of fifty percent. For purposes of the hearing conservation program, employee noise exposures shall be computed in accordance with appendix A and Table C—I 6a, and without regard to any attenuation provided by the use of personal protective equipment. (2) For purposes of paragraphs (c) through (n) of this section, an 8-hour time-weighted average of 85 decibels or a dose of fifty percent shall also be referred to as the action level. (Q) Hearing protectors. (1) Employers shall make hearing protectors available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to the employees. Hearing protectors shall be replaced as necessary. (2) Employers shall ensure that hearing protectors are worn: (Q) By an employee who is required by paragraph (b)(1) of this section to wear personal protective equipment; and (ii) By any employee who is exposed to an 8-hour time-weighted average of 85 decibels or greater, and who: (A) Has not yet had a baseline audiogram established pursuant to paragraph (g)(5)(il.); or (B) Has experienced a standard threshold shift. (3) Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by the employer. (4) The employer shall provide training in the use and care of all hearing protectors provided to employees. (5) The employer shall ensure proper initial fitting and supervise the correct use of all hearing protectors. 0) Hearing protector attenuation. (1) The employer shall evaluate hearing protector attenuation for the specific noise environments in which the protector will be used. The employer shall use one of the evaluation methods described in appendix B: Methods for Estimating the Adequacy of Hearing Protection Attenuation. (2) Hearing protectors must attenuate employee exposure at least to an 8-hour time-weighted average of 90 decibels as required by paragraph (b) of this section. (3) For employees who have experienced a standard threshold shift, hearing protectors must attenuate employee exposure to an 8-hour time-weighted average of 85 decibels or below.

(4) The adequacy of hearing protector attenuation shall be re-evaluated whenever employee noise exposures increase to the extent that the hearing protectors provided may no longer

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Provide adequate attenuation. The employer shall provide more effective hearing protectors where necessary.

(k) Training program. (1) The employer shall institute a training program for all employees who are exposed to noise at or above an 8-hour time-weighted average of 85 decibels, and shall ensure employee participation in such program. (2) The training program shall be repeated annually for each employee included in the hearing conservation program. Information provided in the training program shall be updated to be consistent with changes in protective equipment and work processes. (3) The employer shall ensure that each employee is informed of the following: (i) The effects of noise on hearing; (ii) The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care; and (iii) The purpose of audiometric testing, and an explanation of the test procedures. (1) Access to information and training materials. (1) The employer shall make available to affected employees or their representatives copies of this standard and shall also post a copy in the workplace. (2) The employer shall provide to affected employees any informational materials pertaining to the standard that are supplied to the employer by the Assistant Secretary. (3) The employer shall provide, upon request all materials related to the employer's training and education program pertaining to this standard to the Assistant Secretary and the Director.

(m) Record keeping—(1) Exposure measurements. The employer shall maintain an accurate record of all employee exposure measurements required by paragraph (d) of this section. (2) Audiometric tests. (,) The employer shall retain all employee audiometric test records obtained pursuant to paragraph (g) of this section: (ii) This record shall include: (A) Name and job classification of the employee; (8) Date of the audiogram; (C) The examiner's name; (D) Date of the last acoustic or exhaustive calibration of the audiometer; and (E) Employee's most recent noise exposure assessment. (F) The employer shall maintain accurate records of the measurements of the background sound pressure levels in audiometric test rooms. (3) Record retention. The employer shall retain records required in this paragraph (m) for at least the following periods. (i) Noise exposure measurement records shall be retained for two years. (ii) Audiometric test records shall be retained for the duration of the affected employee's employment. (4) 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. The provisions of 29 CFR i9iO. 1020 (a)—(e) and (g)—(i) apply to access to records under this section.

[Web address is www.gpoaccess.gov/ecfr in Browse, scroll down to and click "Title 29 — Labor"; click "GO"; search and click 1900-1910 (1901.1-1910.999); search and click 1910.1 to 1910.901- 1910.999; click "1910.95 Occupational noise exposure".]

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Purpose

The Incident Reporting Policy and Procedure provides Kent Materials (KM) with a means to ensure that our employees report all incidents in which they are involved -accidents, property damage, near misses, fires, spills, etc. -while working at KM offices, shops, yards and field locations, and while visiting or working at all customers' field locations.

Policy

It is the policy of Kent Materials that our employees report all incidents in which they are involved ***immediately*** to their Supervisors or to Management according to our Incident Reporting Policy and Procedure, utilizing the best practices and techniques available. It is the policy of KM Management to report all applicable incidents to the insurance company within 24 hours after being notified.

Procedure

KM documents its incidents on the U. S. Department of Labor's ***Employer's First Report of Injury*** form (see attached); if the incident is an OSHA recordable, the Report is submitted to OSHA. All incidents are reported immediately to the respective Supervisor or to Management. All incident Reports are completed by the Supervisor or the HSE Manager, and reviewed and processed by Management before being submitted to anyone.

Note: First Aid/CPR is administered and personnel are protected before notifications are made.

1. When an incident occurs, notify your Supervisor ***immediately***, in person or by telephone:

<u>Name</u>	<u>Office No.</u>	<u>Cell No.</u>
Steve Kent	225-930-4512	225-937-0434
Gerard Smith	225-930-4512	225-278-6984
Brad Antie	225-930-4512	225-235-0711
SMS/HSE Manager	225-930-4512	

If you cannot notify your Supervisor, notify Management or the HSE Manager at one of the numbers listed above.

2. Supervisor notifies HSE Manager ***immediately*** at the number above.
3. Within 24 hours of the incident, the Supervisor completes the Report form and submits it to the HSE Manager or Management; if the Supervisor cannot complete the Report form, the HSE Manager completes the Report form with input from the Supervisor and/or employee. If applicable, Management submits the form to OSHA within 72 hours.

Note: Additional Report forms are available from a Jodie at the Port Allen office (225-930-4512).

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Employer's First Report of Injury or Occupational Illness

1. OWCP No.		2. Carrier's No.		3. Date and Time of Accident mo day yr Hour am pm	
4. Name of Injured/Deceased Employee (type or print)-first, M.I., last)			5. Employee's Address(no. street, city, state, zip)		
6. Injury is required under the following act (mark one) A Longshore and harbor workers compensation act B Defense Base Act C Non-appropriated Fund instrumatiels act D Outer continental Shelf lands act		7. Indicate where injury occurred (longshore act only) A aboard vessel or over navigable water B Pier/Wharf C Dry Dock D Marine Terminal E Building Way F Marine Railway E Other Adjoining Area		8. sex M F	
				9. Date of Birth	
				10. Social Security Number (see statement on reverse)	
				11. Did injury cause death? N Y-if yes, skip to 16	
12. Did Injury cause loss of time beyond day or shift accident?		Yes No		13. Date and Hour employee Mo. Day Yr. Hr first lost time because of injury am pm	
				16. was employee doing usual work when injured/killed?(if no explain in item 26) yes no	
14. Did employee stop work Yes immediately No		15. Date and hour employee returned to work			
17. Did injury/death occur on Yes Employer's premises? No		18. Dept. in which Employee normally work(ed)		19. occupation	
20. Date an hr pay stopped	21. Which days usually worked per week? mark x days S M T W T F S		22. Date Employer or foreman first knew of accident		
23. wages or earnings (include overtime allowances)	24. Exact place where accident occurred (see instruction son reverse. This item should specify area if accident was in maritime employment and occurred in area adjoining navigable waters.		25. How was knowledge of accident or occupational illness gained?		
26. Describe in full how the accident occurred (relate the events which resulted in the injury or occupational disease. Tell what the injured was doing at the time of the accident. Tell what happened and how it happened. Name any objects or substances involved and tell how they were involved. Give the full details on all factors which led or contributed to the accident. <div style="text-align: right;">(Use additional sheets if required and attach to this report)</div>					
27. Nature of injury (name part of body affected- fractured left leg. Bruised right thumb etc.) if there was amputation of a member of the body describe.					
28. Has Medical Attention Been authorized Y N	29. Enter date of authorization		30. Was first treating Y physician chosen by N employee?	31. Has Insurance Carrier Been Notified? Y N	
Name		Address- Enter Number, Street, City, State, Zip code			
32. Physician					
33. Hospital					
34. Insurance Center					
35. Employer					
Official Title of this Report			Date		

JOB COMPETENCY	Issue Date:	Kent Materials
	Revision	
	Date:	

Policy

It is the policy of Kent Materials that our personnel are most suitable for the job tasks and are selected for our specific clients and their needs.

Procedure

In order to clearly demark chain-of-command, we have established on organizational chart with associated job titles. This chart illustrates information flow, supervision, and reporting structure.

Each position has a written job description that outlines minimum educational and work experience qualifications and the roles and responsibilities of that respective position. Appropriate documented information is obtained, from all perspective new hires or existing employees seeking to. Change positions within Kent Materials for the position sought Perspective applicants or employees looking to change job positions are asked by the Operations Manager for any applicable and appropriate documentation. Information may include proof of college or trade school degree, certifications, training records, etc.

Job specific training is provided to all new hires and any existing employees changing job positions Training is provided to all employees for tasks they perform on a regular basis. Prior to any employee beginning to perform work on their own, their respective supervisor (competent person) verifies that the employee is indeed competent to perform their assigned roles and responsibilities.

Kent Materials	Policies and Procedures	Issue 8/8/2003
	JOURNEY MANAGEMENT	Rev. date 4/19/2011

Mitigating Road Transport Risks

Due to the wide range of driving environments, Journey Management is split in *two* categories based on risk: high-risk and medium risk.

The first is **Safe Journey Management**.

The second category of Journey Management is “Generic Journey Management” or simply termed **Journey Management**. Using a formal Journey Management Plan (JMP) is a best practice.

A key deliverable of the journey management planning process is the Journey Management Plan (JMP). The JMP is held / filed by a Journey Manager. A journey manager is typically a Dispatcher or applicable supervisor who reviews/approves/logs/files/monitors the Journey Management Plan. Prior to executing the journey the Driver needs to be fully briefed on the journey and the associated risks and mitigating measures as documented in the Journey Management Plan.

1. Demonstrate the Planning of the Journey

The aspects of planning the journey must include:

- If and when to drive and specify that no one day of driving exceeds 10 hours. Contractors operating under DOT rules are exempt due to the mitigating actions provided by laws and documentation requirements under DOT operating rules
- What route to take
- Where to make rest stops (rest every 4.5 hours and drive no more than 10 hours per day)
- What vehicle to use / proper vehicle preparation
- Required driver skills and competence

2. Demonstrate Executing the Journey

Drivers are responsible for executing journeys in line with the agreed Journey Management Plan, but others may need to play a role as well. For example, the Journey Management Plan may include preparations for a ‘Man Lost’ procedure that may need to be started by the Journey Managers. This is relevant when driving through deserted areas, including areas without mobile phone coverage.

3. Demonstrate Close-out of the Journey

Closing-out the journey ensures that the objectives of the journey were met and enables the capture of lessons learned that will be documented to help improve the JMP process for future journeys. It also serves as a notice that the person(s) and communication required to notify to the journey manager, are complete and that the journey is officially ended. The journey should be closed out with the journey manager at completion.

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Basic Journey Management Plan content is:

This is the basic information that must be captured. Other items may be added, but weigh simplicity vs. need.

Has Employee / traveler been informed of driving Life Saving Rules (seatbelt use, no speeding / cell phone use while driving, no alcohol/drugs while on company time, following this JM plan): **Yes / No**

Trip Description: _____

Employee Name: _____

Origin: _____

If "other" origin please specify: _____

Destination: _____

Departure Date (mm/dd/yy): _____

Departure time: _____

Business Purpose: _____

Vehicle Type: _____

Route Briefly describe route

(hwy,etc) _____

Expected road conditions / other known

hazards: _____

Driver's cell

number: _____

Phone number at

destination: _____

Kent Materials	Policies and Procedures	Issue 2/27/2004
	LADDER USE	Rev. date 4/19/2011

Training

The supervisors must ensure that each employee is trained by a competent person in the following areas:

1. How to recognize potential hazardous conditions incident to the use and solution of types of ladders.
2. The correct procedures for erecting, maintaining and disassembling portable extension ladders (non-self-supporting).
3. The requirements and proper methods for tying off ladders.
4. The proper construction, use, placement and care in handling of all ladders.
5. The maximum intended load-carrying capacities of ladders used.

In addition, retraining must be provided for each employee, as necessary, so that the employee maintains the understanding and knowledge acquired.

Inspections

Each employee shall inspect any portable wooden ladder that he or she intends to use before using it the inspection shall include, but is not limited to:

1. Materials: Must be free from sharp edges and splinters and must be rugged and sound.
2. Care: Internal inspection procedures for joints between steps and side-rails; hardware and fittings securely attached; locks, wheels, pulleys, etc. are lubricated; ropes on extension ladders are in good condition; ladders are equipped with safety feet and feet are securely attached and in good condition.
3. All ladders that are found to be defective shall immediately be removed from use, tagged with an "Out of Service" tag in a visible location and delivered by the employee discovering the defect to his supervisor for repairs.
4. The results of the inspection shall be recorded on the inspection checklist

Each employee shall inspect any portable metal ladder that he or she intends to use before using it.

- The inspection shall include, but is not limited to:

1. Materials: Must be free from structural defects and sham edges. Metal construction is strong enough to meet use requirements. Metal is protected from corrosion.
2. Care: Maintained in good condition. The ladders will be re-inspected immediately if the ladder is tipped over (inspect for dents and bends) or if it is exposed to oils, grease, corrosives or solvents.
3. All ladders that are found to be defective shall immediately be removed from use, tagged with an "Out of Service" tag in a visible location and delivered by the employee discovering the defect to his supervisor for repairs.
4. The results of the inspection shall be recorded on the inspection checklists.

General Rules

1. Ensure that the ladder feet are placed on stable and level ground. If able, The Company prefers that you use the "buddy system", (i.e., have another employee hold the ladder while you are on it) but it is not mandatory and may not be feasible in some situations.
2. Portable rung and cleat ladders shall, where possible, be angled so that the distance from the feet of the ladder to the supporting structure be approximately 1/4 of the distance from the feet to the point of contact on the supporting structure.
3. The ladder shall not be used in a horizontal position as platforms, runways or scaffolds.
4. Only one person at a time is allowed on any single ladder.
5. Portable ladders shall be placed so that the side rails have a secure footing. The top rest for portable rung and cleat ladders shall be reasonably rigid and shall have ample strength to support full applied load.
6. Ladders shall not be placed in front of doors opening toward the ladder unless the door is locked or guarded.

Kent Materials	Policies and Procedures	Issue 10/27/2003
	CONTROL OF HAZARDOUS ENERGY (LOCKOUT/TAGOUT)	Rev. date 4/19/2011

Purpose

The purpose of the Control of Hazardous Energy (Lockout/Tagout) Policy and Procedure (Program) is to ensure that machines and equipment are stopped, isolated from all potentially hazardous energy sources (electrical, hydraulic, mechanical, pneumatic, chemical, thermal, pressurized gas, and others), and locked out and/or tagged out before employees perform any servicing or maintenance where the unexpected energizing or start-up of the machine or equipment or release of stored energy could cause injury.

Policy

It is the Policy of Kent Materials (KM) that all hazardous energy sources are locked and/or tagged before machines and equipment are serviced or maintained.

Procedures

Affected employees (persons whose jobs require them to operate or use machines or equipment) are required to comply with the restrictions and limitations imposed upon them during the use of lockout and/or tagout. **Authorized employees** (persons who lock or tag machines or equipment) are required to perform the lockout and/or tagout in accordance with this procedure. Employees, upon observing a machine or piece of equipment which is locked out or tagged out to perform servicing or maintenance, do not attempt to start, energize, or use that machine or equipment.

[The web address for a current copy of the OSHA standard is www.gpo.gov/ecfr; scroll down to and click "Title 29 — Labor"; click "Go"; click "1900-1910"; click "1910"; click "1910.147 The control of hazardous energy sources".]

The established procedures for the application of energy control (the lockout or tagout procedures) cover the following elements and actions and are accomplished in the following sequence:

1. Affected employee informs authorized employee(s) 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 **before** affected employee turns off machine or equipment.
2. Affected employee turns off or shuts down machine or equipment using the procedures and devices established for the machine or equipment (push buttons, selector switches, circuit control devices, and similar mechanisms); an orderly shutdown is utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.
3. Authorized employee locates and physically operates (turn off disconnect, interrupt, etc.) all energy isolating devices (manually-operated electrical circuit breakers, disconnect switches or levers, line valves, blocks, and similar mechanisms) needed to control the energy to the machine or equipment in such a manner as to isolate the machine or equipment from the energy source(s).

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4. If the energy source is powered by electricity, authorized employee first isolates the components of the electrical installation by turning off the main disconnect and checks it to be sure the disconnect has operated correctly. Employees follow these steps to DE energize and work on electrical parts.

- a. Check exterior of disconnect or switch box for damage; if determined unsafe, contact electrician.
- b. Stand in dry spot away from front of disconnect or switch box and tap metal using back of right hand to check for electricity; if electrical shock experienced, contact electrician.
- c. Using the right hand, and while wearing an electrical glove, shut off disconnect or switch in switch box (put in OFF position).
- d. Use voltage tester to verify the electricity is disrupted between electricity source and machine or equipment.
- e. Turn appliance switch ON to verify it has no electrical energy, then **OFF** again.

5. Fill in information requested on both sides of each tag approved for use, applicable to the machine or equipment being serviced or maintained:

- a. Name of person applying tag.
- b. Expected completion time and date.
- c. Reason for tagging device (describe).
- d. Equipment (machine) description.
- e. Clearance number.
- f. Work order number.

6. Authorized employee ensures lockout and/or tagout devices are applied according to the following:

- a. Lockout or tagout devices are affixed to every energy isolating devices by authorized employees.
- b. Lockout devices are affixed in a manner that holds the energy isolating devices in a “safe” or “off” position.
- c. Tagout devices are affixed in a manner that clearly indicates that the operation or movement of the energy isolating devices from the “safe” or “off” position is prohibited.
- d. If applicable, place proper electrical danger/warning tag on each disconnected electrical part.
- e. Where tagout devices are used with energy isolating devices designed with the capability of being locked, the tag attachment is fastened at the same point at which the lock would have been attached.
- f. Where a tag cannot be affixed directly to the energy isolating device, the tag is located as close as safely possible to the device, in a position that is immediately obvious to anyone attempting to operate the device.

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7.

7. Following the application of lockout and/or tagout devices to energy isolating devices, authorized employee relieves, disconnects, restrains, blocks, or otherwise renders safe all potentially hazardous stored or residual energy.

Note: If the possibility exists that stored energy can re-accumulate to a hazardous level, verification of the isolation is continued until the servicing or maintenance is completed.

8. Prior to starting work on machines and equipment that have been locked *and/or* tagged out, person-in-charge verifies isolation and de-energizing of the machine or equipment by the authorized employee(s) has been accomplished.

9. If equipment is powered by electricity, authorized employee use a voltage tester to verify that the equipment has been de-energized. Employee completes these steps to control hazardous energy using a voltage tester:

- a. Set voltage Selector to 250+ volts if appliance uses 110 or 220 volts or set selector to 500+ volts if appliance uses 440 or 480 volts.
- b. If applicable, verify probe ends are securely in place in voltage tester.
- c. Check needle on voltage tester register; verify at "0" on dial.
- d. Safely expose point where electricity source and wiring to appliance meet switch in disconnect.
- e. Put one voltage tester probe on electrical source and hold in position:
- f. Put other voltage tester probe on wire to appliance and look at register: if needle registers 110, 220, 330, or 480, electricity energy source is still present; if needle registers '0', energy source is disrupted.

10. If service or maintenance continues into another shift, the authorized employee on the old (off-going) shift meets with the authorized employee on the new (on-coming) shift and:

- a. presents the information obtained in steps #1 through #6 regarding the machine or equipment to be serviced or maintained,
- b. prepares new tags with information concerning the new scenario
- c. removes old lock(s)/tag(s) on energy isolating device(s), and
- d. places his/her new lock(s) and tag(s) on the energy isolating device(s).

11. Person-in-charge ensures work on the machine or equipment is performed according to the proper procedures and is accomplished utilizing all of the health, safety and environmental policies and procedures appropriate to the activity.

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12. Before *energy* is restored to the machine or equipment, authorized employee ensures these procedures are followed and actions are taken:

- a. Work area is inspected to ensure that non-essential items are removed and machine or equipment components are operationally intact.
- b. Work area is checked to ensure all employees are safely positioned or removed.
- c. Each lockout or tagout device is removed from each energy-isolating device by the authorized employee who applied the device.
- d. *Exception to "c"*: When the authorized employee is not available to remove it, that device is removed by the person-in-charge; the person-in-charge follows specific procedures and training to
 - Verify that the authorized employee is not at the facility.
 - Make all reasonable efforts to contact and inform authorized employee that device has been removed.
 - Ensure authorized employee knows about removal before resuming work.

13. After lockout and/or tagout devices are removed, and before the machine or equipment is started, authorized employee notifies affected employee that service or maintenance is completed and the machine or equipment is ready for use.

14. Affected employee restores machine or equipment to service: verify the controls of the machine or equipment are in neutral (if applicable) and turns on or starts up machine or equipment using the procedure established for the machine or equipment.

For situations in which lockout or tagout devices are temporarily removed from the energy-isolating device and the machine or equipment is energized to test or position the machine, equipment or component thereof, the following sequence of actions is ensured by the person-in-charge:

1. Clears the machine or equipment of tools and materials.
2. Removes employees from the machine or equipment.
3. Removes the lockout or tagout device.
4. Energizes the machine or equipment and proceeds with testing or positioning.
5. De-energizes all systems and reapplies energy control measures to continue the service and/or maintenance.

Refer to the complete steps in the previous procedure as necessary. Repeat this process in exactly the same sequence as often as necessary to safely complete the service or maintenance.

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Whenever outside servicing personnel are engaged in activities covered by this scope and application, the person-in-charge and the outside contractor representative inform each other of their respective lockout or tagout procedures. If the outside contractor uses its own lockout or tagout procedures in conjunction with the KM procedures, the person-in-charge ensures that his/her employees understand and comply with the restrictions and prohibitions of the outside contractor's energy control program.

Periodic Inspections

KM conducts periodic inspections of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed (see *Energy Control Inspection* checklist attached). The inspection is conducted to correct any deviations or inadequacies identified and performed by an authorized employee other than those utilizing the energy control procedure being inspected. Where lockout is used for energy control, the periodic inspection includes a review between the inspector and each authorized employee of that employee's responsibilities in that department. Where tagout is used for energy control, the periodic inspection includes a review between the inspector and each authorized and affected employee of the employee's responsibilities in that department.

Locks, tags, chains, wedges, key blocks, adapter pins, self-locking fasteners, or other hardware is provided by KM for isolating, securing and blocking machines and equipment from energy sources. Lockout devices and tagout devices are singularly identified within each department, are the only devices used for controlling energy, are not used for other purposes, and meet the following requirements when inspected by authorized employees:

1. Verify lockout and tagout devices are durable:
 - a. Are withstanding the environment to which they are exposed.
 - b. Are not deteriorating or becoming illegible because of adverse conditions.
 - c. Are not deteriorating because of corrosive environments.
2. Verify lockout and tagout devices are standardized for color, shape, size, print and format within each department.
3. Verify lockout devices are not easily removed without the use of excessive force or unusual techniques (bolt cutters, metal cutting tools).
4. Verify tagout devices are not able to be inadvertently or accidentally removed (non- reusable type attachments, attachable by hand, self-locking, non-releasable; equivalent to a nylon cable tie).
5. Verify tagout devices indicate the identity of the employee applying the device.
6. Verify tagout devices warn against hazardous conditions: *Do Not Start, Do Not Open, Do Not Close, Do Not Energize, Do Not Operate.*

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KM certifies that the periodic inspections are performed. The certification identifies the machine or equipment on which the energy controlled procedure is utilized, the date of the inspection, the employees included in the inspection, and the person performing the inspection.

Employee Training

KM provides 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 training includes the following:

Authorized Employees

- Recognition of applicable hazardous energy sources.
- Type and magnitude of the energy available in the workplace.
- Methods and means necessary for energy isolation and control.
- skills and techniques to distinguish exposed live parts from other parts of electric equipment.

Affected Employees

- Purpose and use of the energy control procedure.

Both, When Tagout Systems are Used (review only)

- Tags are essentially warning devices affixed to energy isolating devices, and do not provide the physical restraint on those devices that is provided by a lock.
- When a tag is attached to an energy isolating means, it is not to be removed without authorization of the authorized employee responsible for it, and it is never to be bypassed, ignored, or otherwise defeated.
- Tags must be legible and understandable by all authorized employees, affected employees, and all other employees whose work operations are or may be in the area, in order to be effective.
- Tags and their means of attachment must be made of materials, which will withstand the environmental conditions encountered in the workplace.
- Tags may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program.
- Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.

All Other Employees (whose work operations are or may be in an area where energy control procedures may be utilized)

- Use of energy control procedure.
- Prohibition relating to attempts to re-start or re-energize machines or equipment which are locked out or tagged out.

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KM certifies that employee training is accomplished and is kept up-to-date. The certification contains each employee's name and date of the training.

Retraining is 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 procedure. Additional retraining is also conducted whenever a periodic inspection reveals, or whenever KM has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of the procedure. Retraining re-establishes employee efficiency and introduces new or revised control methods and procedures as necessary.

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Energy Control Inspection

Department/Location _____ Lockout _____ Tagout _____ Both _____

Machine or equipment on which procedure utilized _____

Yes/No/NA

1. Affected employee informs authorized employee of:
 - Type and magnitude of the energy. _____
 - Hazards of the energy to be controlled. _____
 - Method or means to control energy. _____
 2. Affected employee turns off or shuts down equipment. _____
 3. Authorized employee operates all energy isolating devices. _____
 4. Authorized employee ensures lockout/tagout devices are applied:
 - Lockout/tagout devices are affixed to each isolating device. _____
 - Lockout devices hold energy isolating devices in "safe" position. _____
 - Tagout devices indicate movement from "safe" position is prohibited. _____
 - Tag fastened at same position as lock would have been. _____
 - Tag located as close as safely possible, immediately obvious. _____
 5. Authorized employee relieves, disconnects, restrains, blocks, etc. hazard. _____
 6. Person-in-charge verifies isolation and de-energizing accomplished. _____
 7. Transfer completed properly when work extends to another shift. _____
 8. Person-in-charge ensures work at location done safely. _____
 9. Authorized employee ensures:
 - Work area items removed/equipment operationally intact. _____
 - Work area employees safely positioned or removed. _____
 - Lockout/tagout devices removed by employee applying them. _____
 10. Authorized employee notifies employee(s) equipment ready for use. _____
 11. Affected employee restores equipment to service. _____
- Lockout/Tagout devices are used only for the control of energy. _____
- Lockout/Tagout devices capable of withstanding environment to which they are exposed. _____
- Lockout/Tagout devices are standardized within each department (color, shape, size). _____
- Lockout/Tagout devices substantial to prevent inadvertent or accidental removal. _____
- Tagout devices indicate identify of the employee applying the device. _____
- Deficiencies/inadequacies identified/performed by authorized employee: _____
- Inspector reviewed deficiencies/inadequacies with: _____
- Hardware used (check): Locks _____ Tags _____ Chains _____ Wedges _____ Key Locks _____ Adapter Pins _____
- Self-Locking Fasteners _____ Other (list) _____

Comments _____

Employees included in inspection _____

Inspector (print) _____ (signature) _____ Date _____

MANUAL MATERIAL HANDLING	Issue Date:	Kent Materials
	Revision Date: 12/12/11	

Policy

It is the policy of Kent Materials to eliminate, reduce, avoid and/or control potential exposures associated with the manual handling of materials when performing transitional activities, work tasks and jobs at company and/or client worksites.

Procedure

If the elimination of manual material handling exposure cannot be eliminated during job tasks or while performing transitional activities, then manual material handling techniques are used.

Manual Material Handling exposures typically include:

- o Lifting, struck by, caught between, slips, pushing, pulling, and grasping, when related to manual handling of materials, objects or loads. Included are static postures, forceful exertions, duration, frequency, repetition, awkward postures, and sudden jerking motions.

Resultant Incidents could result in the following types of injuries:

- o Strains, contusions, lacerations, and fractures.

Any injuries sustained as the result of manual material handling are investigated to determine corrective actions that may be incorporated into work procedures in effort to avoid reoccurrence. Injuries are logged on the OSHA 300 Recordkeeping logs per the 29 CFR 1904 Standards.

Avoiding injuries requires that our personnel understand manual material handling exposures and have the ability to make smart safe decisions when faced with these exposures. In order to have our workforce at this level of understanding, we educate and train them.

Manual material handling exposures can be eliminated, avoided, reduced and/or controlled through engineering methods, use of mechanical lifting aids, and planning work tasks and activities. When possible, employees should strive to minimize manual material handling exposure by attempting to follow the following in order:

1. *Eliminate* the need to manually handle materials
2. *Avoid* the need to manually handle materials
3. *Reduce* the exposure
4. *Control* the exposure

Personnel should strive to attempt the following whenever engaged in manual material handling:

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- o Avoid awkward postures, repetition, forceful exertions, sudden jerking motion, and static postures. The duration and frequency of manual material handling activities can also be an exposure factor.
- o Understand the size, bulk and weight of the item.
- o Utilize mechanical lifting / moving aids if possible, if not, get assistance and use a “two-man” lift technique.
- o Ensure that clear vision can be maintained and the travel route is clear of obstructions.
- *When possible, pushing is preferred over pulling.
- * Good housekeeping, such as the elimination and cleaning up of liquid spills, also reduces the exposure to slips. Materials should not be stored in general walkways, on or in front of stairways or ladders, or in a manner where they would pose an exposure to personnel who may manually handle materials. It is ideal to store heavier loads at or near waist level. This storage approach limits the range in motion that personnel need to make when lifting the load from its inert state.
- * Footwear should have substantial tread for gripping walking working surfaces. If walking in wet areas, short shuffle steps with feet in a horizontal position, verses heel to toe steps, is a safer method.
- * When grasping loads it is important to have the proper hand protection and a secure and proper grip. Hand placement it also important, as to avoid injury from caught between and struck by incidents.

Mechanical lifting / moving aids such as hand dollies, chain hoists, jacks, carts, etc. are provided to employees. Employees are expected to utilize these aids when possible. Supervisors are to ensure that if manual lifting / moving of items is performed without mechanical aids, it is due to the reason that mechanical aids are not possible in that situation.

Basic Lift Technique

1. Ensure walkway is clear of obstructions and slip/trip hazards.
2. Position yourself in front of the object:
 - a. Face the object squarely, standing as close to it as possible.
 - b. Place feet about a foot apart, with one foot alongside and one behind the object.
 - c. Lower yourself to object by bending your knees (squat).
 - d. Keep your back straight and your chin level.
3. Grasp the object:
 - a. Place one hand underside of the object that is closest to you,
 - b. Place your other hand on the topside of the object farthest from you,

Note: Your bottom hand supports most of the weight and your top hand keeps the load balanced against your body.

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- c. Extend your fingers and hands around object, and
- d. Keep your back straight and chin level, and tuck elbows and arms into the side of your body while keeping load close to body.

Note: If the arms are held away from the body, they lose much of their strength.

Keep your forearms parallel to the ground.

- 4. Lift the object:
 - a. Position your body so the weight of the object is centered between your feet.
 - b. Slowly straighten your knees; be careful not to twist your body as you lift.

Note: Your legs determine your strength. If the legs and arms are used in this manner during the lift, a back injury is less likely.

- 5. Carry the object to the setting down point, keeping correct body position (chin level, back straight and arms tucked into body and parallel to ground).
- 6. Set the object down:
 - a. Face the setting down point squarely so you do not have to twist your body while lowering load,
 - b. Spread your feet about a foot apart,
 - c. Lower yourself and the object by bending your knees slowly while,
 - d. Keeping your back straight, your chin level and the object close to your body, and
 - e. Release the object and stand.

Body Preparedness

Like professional athletes, preparing our bodies prior to physical activity requires stretching and warming the muscles. Muscles that are not prepared prior to engage in physical activity are more susceptible to injury.

Stretching can be done in groups or be done individually. A charismatic leader tends to inspire the rest of the participants in the stretching exercises. This should be a light, fun activity that the workforce looks forward to participating in.

Stretching exercises should be low impact and be provided under the supervision of a health care provider, physical therapist or other qualified individual. A cool down period should ensure shortly have exercise. Typical stretch exercises include toe touches, squatting, isometric muscle flexing, neck rolls, flexing hands and fingers, shoulder rolls, etc. Employees need to be aware of their own abilities and limitations.

Ergonomic Determination

Proper position of individual workstations is important to avoid body strain. Periodically, management evaluates work areas and employees' work techniques to assess the potential for and prevention of

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Work station positioning includes table/counter / drop height and levelness, height and angle of chair seat, position of chair arm rests, reaching distances, etc.

Training

Manual material handling and proper lifting techniques training to avoid musculoskeletal injuries is accomplished through the review of this policy and procedure. Training also includes general principals of ergonomics, hazardous condition reporting procedures, and immediate reporting of injuries and near misses. “Hands on” demonstration and performance by personnel is exercised to provide immediate feedback on proper execution and corrective action and for increased retention (muscle memory). Manual material handling training is provided initially, and whenever there is a need to retrain personnel.

MOBILE EQUIPMENT	Issue Date:	Kent Materials
	Revision Date: 12/12/11	

Policy

It is the policy of Kent Materials that the use of mobile equipment is done in a safe manner.

Procedure

Only authorized employees are allowed to operate mobile equipment. Authorization to operate mobile equipment is only given to employees who have received appropriate training and undergone proficiency training.

Prior to operation and at the beginning of each work shift, the authorized operator inspects the assigned mobile equipment of the following items:

- the clutch or braking system
- steering
- lighting
- control system
- back-up alarm

If there are any malfunctions identified, the employee lockouts and tagouts the equipment and immediately notifies their supervisor.

Under no circumstance are unauthorized personnel allowed to ride on equipment, unless it is equipped to accommodate passengers safely.

Mobile equipment shall not be operated without a working back-up alarm.

Mobile equipment shall not be operated without the protection of an enclosed cab or the operator wearing approved eye protection.

Seatbelts must be properly worn before starting mobile equipment and while it is in use.

Equipment is only used in the manner in which it is designed and intended.

All load limits must be recognized and adhered to.

All loads are secured for safe transport; loads centered.

Safe fueling procedures must be followed. The mobile equipment is shut-off prior to fueling. The nozzle of the filling hose is to make contact with the filling neck of the tank at all times. No one is allowed to be on the vehicle while it is being fueled. Smoking and open flames are prohibited in the area immediate to the fueling operation.

Kent	Policies and Procedures	Issue 4/18/11
Materials	NEW HIRE ORIENTATION	Rev. date

Purpose

The New Hire Orientation Policy and Procedure provides Kent Materials with a consistent means to ensure that all newly hired employees are provided an awareness understanding of company expectations, necessary paperwork is completed, and specific communications are exchanged prior to beginning work.

Policy

It is the policy of Kent Materials to ensure that all newly hired employees receive formalized new hire orientation after the time of hire and prior to beginning work. Procedure New hire orientation is an important aspect of Kent Materials, as it is one of the first safety impressions made upon new employees by top management. By actively participating in the new hire orientation process, top management demonstrates, through action, its commitment to employee health and safety. To ensure that consistency in this procedure is achieved, the following is accomplished:

1. The HR Manager ensures that all Orientation Items (located at the top of the Orientation Checklist are either addressed or completed, and this is signified by writing the date of completion in the date column.

NOTE: Since there are specific items on the checklist that does not require involvement from the newly hired employee, the facilitator completes these on their own prior to the Orientation Checklist being filed.

2. Upon completion of their respective section of the Orientation Checklist, the HR Manager brings the employee and the checklist to the Operations Manager.
3. The Operations Manager reviews and discusses (orientates) with the employee information under that managers respective section of the Orientation Checklist.
4. The Operations Manager signifies completion of each orientation items by writing the date in the respective date column.
5. The Operations Manager returns the Orientation Checklist to the HR Manager filing.
6. The HR Manager ensures that all orientation items in all sections have been completed, by checking for date entries in the date column.
7. Upon successful completion, the HR Manager files the Orientation Checklist in the respective new hires personnel file.

	NEW HIRE ORIENTATION	Rev. date
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Training

All individuals involved in providing new hire orientation accomplish training by reviewing the contents of this Policy and Procedure initially and annually thereafter

Operations Manager (and designees) describes/explains these Policies & Procedures to all New Hires:

Orientation Item	Date
Application	
Employee Information Book (provide, review and sign acknowledgement)	
Salary, Vacation, Holiday, PTO, 40 1K, Life Insurance, Long Term Disability Insurance	
Employment_Eligibility_Verification_(1-9_form)	
Employee Withholding Allowance Certificate (W-4 form)	
Employee_Emergency_Contact_Information_Data_Sheet	
Motor_Vehicle_Record_and_DOT_Violation_Check	
Post Hire Medical History Questionnaire—Second Injury Form	
Complete all employment forms	
You must complete Pure Safety Training and any pre- job orientation before you report for work	
Our safety efforts are designed to provide you with the right choices so you can make smart safe decisions to protect yourself.	
You are not allowed to possess or use drugs, alcohol and/or contraband while at any of the Company's facilities (warehouses, parking lot, shops, vehicles, etc.) or at our customer's locations. Provide copy of written drug and alcohol policy AND obtained signed acknowledgement form.	
You must report all incidents (injuries, product, equipment or property damage, vehicle collisions, spills, etc.), including near misses (an incident without injuries), to your respective supervisor (<i>Incident Reporting</i>).	
You are not allowed to use or handle any chemicals until you are properly trained; Material Safety_Data_sheets_are_kept (<i>Hazard Communication</i>).	
You must wear slip resistant footwear, safety glasses, etc. while performing applicable job duties and responsibilities; Issue PPE.	
If you detect a fire, yell, "FIRE"! and contact a supervisor and/or emergency response; extinguish fires only if properly trained.	
You must demonstrate proper lifting, equipment operation (hoses), housekeeping, etc. while performing job duties and responsibilities (<i>Safe Work Practices</i>).	
You must inspect your equipment prior to and during use to ensure it is in good condition and properly guarded; you are not allowed to use unsafe equipment (<i>Safe Work Practices, and Inspections</i>).	

You are not allowed to render First Aid/CPR unless you are properly trained and certified, and have the proper Personal Protective Equipment. First aid kit and eye wash station/shower is located in the Area (*First Aid/CFR*). ____

In the event of an emergency, you must notify any supervisor and emergency response (911); when you evacuate, go to the muster area (where) ____ (*Emergency Evacuation*). ____

You are not allowed to operate any forklifts until you are properly trained and certified, and have permission from your supervisor (*Forklift*). ____

You must not repair, service or maintain any equipment that has not been Locked Out, Block Out and/or Tagged Out, and only if properly trained (*Control of Hazardous Energy*).

DRIVER ORIENTATION:

Orient new drivers will all paperwork associated with Kent Materials, Inc.

WorkTickets-UCI 28-IFTA-Time Sheet/Log Book-Maintenance Report-Vehicle Inspection
Report-Permits (Road)
Familiarize new employee with all Safety Equipment
DAY ONE: Review Paperwork and function of equipment being operated—New employee is a passenger on Day One. He/She is to watch and assist Trainer
DAY TWO: Begin driving to location of jobs—Get thing ready to do the job—Complete paperwork for job—Finishing job and preparing to leave job site
DAY THREE: Same as Day Two
DAYS 4 & 5: Same as Day 2 & 3. New employee will be in his/her own truck and follow trainer
Different skills to be taught: Hauling fresh water from pits and fire hydrant—Hauling flow back and saltwater to disposal—Hauling mud from mud-plant to rigs, from rigs to franc tank,frac tank to frac tanks,rolling mud in storage tanks—Color cut saltwater and flowback with oil—Pull bottoms from production tanks—Washing out frac tank—Pulling pits to disposal or for spud-in water for rigs—Move fluids for a rig tank (work-over rig)—
Flushing frac equipment—Mixing KCL

Comments:

Date Signed: _____

Employee

Name _____

Employee

Signature_____

Operations_____

Manager/Trainer Name

Operations-Manager/Trainer Signature _____

PERSONAL PROTECTIVE EQUIPMENT	Issue Date: 7/29/2010	Kent Materials
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POLICY

It is the policy of Kent Materials (KM) to conduct a workplace hazard assessment and generate a written certification for Personal Protective Equipment for all of its facilities and clients' work locations. It is also the policy of KM to ensure that its employees wear proper PPE to protect themselves while in the workplace.

PROCEDURE

According to OSHA, over 30% of all disabling injuries in the workplace involve hand, finger, eye, head, face, foot and toe injuries; it has been estimated that as many as 2,500 eye injuries occur in the workplace **every workday**. Personal protective equipment (PPE) provides protection to you so you do not become a statistic. Safety glasses, goggles and face shields, cotton and cut-resistant Kevlar gloves, and fire retardant clothing are provided, used and maintained in a sanitary and reliable condition to ensure employees are protected from the affects of hazards through absorption, inhalation, ingestion, or physical contact. [Note: Respiratory devices are found in the *Respiratory Protection Policy and Procedure* and hearing protectors are found in the *Hearing Protection Policy and Procedure*.] Hard hats and protective footwear are required by KM, but provided by the employee. Employee provided PPE must meet the specific requirements (adequacy, maintenance and sanitation) that are stated in this program. Defective and damaged PPE shall not be worn. Operations Manager:

1. Conducts hazard assessment of offices, shop, warehouse, yard, and/or field work locations to determine if hazards are present, or are likely to be present, that necessitate use of PPE (see *Hazard Assessment Table* attached).
2. Certifies assessment in writing, with signature and date, according to Standards, on a *Certification of Hazard Assessment* form (attached).
3. Discusses results of latest hazard assessment for each hazard with employees shortly after annual assessment is conducted, during training session(s).
4. Ensures PPE is issued to employees (or employees provide PPE) based on job duties/activities and related hazards, and employees wear PPE when performing work; newly-hired employees receive company-provided PPE during employment process and/or when they first arrive in workplace.
5. Replaces company-provided PPE upon verbal request by employees when PPE is lost, damaged, defective, wrong size, or in some way not able to provide best protection.
6. Verifies proper use and condition of PPE by conducting and documenting regular inspections of employees wearing PPE in workplace. Any discrepancies found are **corrected immediately**; this includes providing PPE, cleaning PPE that is dirty, disposing of defective and damaged PPE, etc.

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7. Takes inventory of company-provided PPE in workplace regularly to determine if PPE stocks are in need of replenishing; if stocks in need of replenishing, ensures required PPE is obtained and made available to affected employees.

The assessment and certification are accomplished annually or when significant changes occur in the workplace. The new Hazard Assessment Table and Certificate of Assessment are attached to this procedure and the old Table and Certificate discarded.

Hard Hats

Employee-provided hard hats comply with ANSI Standard Specification Z89.1, latest edition; look for the approval on a label inside the shell. This hard hat is a type that reduces electrical shock; aluminum and “bumper” type hard hats are not acceptable. Hard hats consist of two parts: the outer shell and the suspension system. The suspension system consists of straps attached to keys that anchor the straps to the shell, which keeps the shell away from the head and cushions any blows. Wear the hard hat when required in the yard, shop, and at client field locations.

1. If necessary, assemble unit by attaching suspension to hat (see instructions).
2. Adjust suspension and try fit (repeat) until hat fits comfortably and does not shift from side to side; design of suspension indicates front of hat, and brim should be parallel with ground or walking surface when donned.
3. Visually examine hard hat regularly for any foreign materials (oil, paint, tar, etc.); if present, wash with warm, soapy water, rinse thoroughly and allow to dry.
4. Visually examine for damage and brittleness (dents, torn straps, broken sewing lines, loose rivets, defective lugs, loose headbands, punched holes, paint, signs of chalking or cracking, and other defects); if damaged or brittle, dispose of by separating shell from suspension and discarding separately to discourage others from using, and obtain new hard hat.

There are two types of hard hats: type 1 has a full brim around the shell; type 2 has no brim but may include a beak. Both types of hard hats are classified into three groups:

- **Class A:** designed to protect against impact from falling objects and from electric shock during contact with exposed low-voltage conductors (up to 2,200 volts).
- **Class B:** designed to protect against impact from falling objects and from electric shock during contact with exposed high-voltage conductors (up to 20,000 volts).
- **Class C:** designed to protect against impact from falling objects but not to protect against electrical hazards.

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The suspension should be adjusted to leave at least 1-1/4" distance between the top of the suspension and the hard hat shell. Never store or carry anything in your hard hat. Altering a hard hat in any way reduces its effectiveness; painting on a hard hat damages the shell and reduces the protection provided. Do not store a hard hat in direct sunlight or expose it to extreme temperatures; doing so damages the keys that anchor the suspension system to the shell. Never wear a hard hat backward, unless the shell and suspension system are designed to be reversible and are reversed. So called "bump caps" are another form of head protection but only protect the head from the impact of bumping into stationary objects; they do not protect against falling objects or electrical hazards.

Eye and Face Protection

Safety Glasses

Safety glasses (including prescription safety glasses) usually have side shields and comply with ANSI Z87.1, latest edition; this code is stamped or embossed on the frame of the glasses. Safety glasses are worn to resist impact and side entry from flying particles (side shields) when working in yards, shops, warehouses, and at field locations.

1. Adjust arms (if possible) and try fit (repeat) until glasses fit comfortably and do not slip off face; glasses should feel snug on face.
2. Visually examine glasses regularly for foreign materials; if present, wash with water and wipe dry with a non-abrasive cloth or paper.
3. Visually examine glasses for scratches, missing side shields, cracks, scratches and other surface damage; if visibility bad, missing side shield(s) or damaged glasses, replace them.

Side shields are always worn when flying particle hazards exist. Contact lenses provide no protection against eye hazards. Contact lenses **must not be worn** in areas in which you may be exposed to chemicals, vapors, splashes, radiant or intense heat or molten metals nor should they be worn in atmospheres that contain large concentrations of particulates, such as dust or dirt. Water-permeable lenses can be ruined by chemical splashes and can complicate receiving medical attention, should a chemical splash occur.

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Goggles

Goggles protect eyes from flying particles, chemical splashes, vapors, dust and mists. Chemical goggles (for chemical splash protection) have indirect vents to help prevent the chemical liquid from entering the goggle through the vents. Chipping goggles have contour-shaped, rigid plastic eyecups and provide maximum protection from flying particles. A transparent and durable coating can be applied to protect the lenses from pitting. Many goggles fit over regular prescription glasses.

Goggles usually consist of a rubbery or hard plastic frame, one or two lens, and an elastic band, with two adjustment clasps; the band is loosened or tightened to give the most comfortable fit. Only goggles meeting the requirements in ANSI Z87. 1, latest edition, are worn.

1. Adjust bands and try fit (repeat) until goggles fit comfortably and do not slip off face; design of goggles indicates which part fits over bridge of nose, and edges of goggles should fit tightly against face.
2. Visually examine goggles regularly for any foreign material; if present, wash with soap and water, rinse thoroughly and allow to dry.
3. Visually examine goggles, lens and bands for scratches, damage and brittleness; if visibility is bad or if they are damaged or brittle, replace them.

Employees who wear prescription lenses while engaged in operations that involve eye hazards wear eye protection that incorporates the prescription in its design, or wear eye protection over prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses.

Face Shields

Face Shields consist of a heat or chemically treated clear plastic shield attached to a headband that fits over the head or attaches to a hard hat. The headband is adjusted in a manner similar to the hard hat. Face shields are worn whenever there is danger of exposing the eyes and face to flying objects, hazardous chemicals, steam releases, or other conditions that could result in injuries to the eyes and face. Only face shields meeting ANSI Z87.1, latest edition standards, are worn.

1. If necessary, assemble unit by attaching shield to suspension (see instructions).
2. Adjust suspension and try fit (repeat) until headband or hard hat attached to shield fits comfortably and does not shift from side to side; face shield is at front, and headband should be parallel with ground or walking surface when donned.

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3. Visually examine face shield regularly for any foreign material; if present, wash with soap and water, rinse thoroughly and allow to dry.

4. Visually examine headband and shield for scratches, warping, damage and brittleness; if vision is not clear because of scratches or warping, or shield or headband is damaged or brittle, replace them.

As a general rule, whenever a face shield is worn, other eye protection such as safety glasses or goggles should be worn. Always make sure your eye and face protection equipment is comfortable and fits well.

Gloves (Work, Cut-Resistant)

Approximately 18% of all disabling injuries in the workplace involve the hands and fingers. Gloves provide protection for the hands and fingers, and are worn whenever there is a reason to protect the hands from sharp objects, hazardous chemicals, electricity, or other conditions.

Abrasion- or cut-resistant gloves are used with large, rough or sharp objects and are made of a variety of materials, including leather, stainless steel wire or wire mesh, synthetic fiber, Kevlar, rubber, PVC, latex or nitrile coating. General purpose gloves protect against minor cuts, scrapes and dirt and are made from leather, canvas or other fabrics. Chemical-resistant gloves are made of materials that protect hands from chemicals and fine dusts. All types are waterproof, come in a variety of thicknesses, and can have liners for insulation and perspiration absorption. They are made from nitrile, neoprene, PVC, Viton, PVA, butyl or natural rubber.

1. Try fit (repeat) until gloves are close fitting and feel comfortable (not too tight).
2. Visually examine gloves regularly for soiling and foreign material; if present, wash, rinse thoroughly and allow to dry.
3. Visually examine gloves before each and after each use for excessive wear, holes, tears, breaks, deterioration of glove material (loss of color, cracking, sponginess and stickiness) and other damage, and replace as needed; replace damaged or soiled gloves.

Note: Additional information regarding chemical gloves is provided in the Hazard communication Policy and Procedure.

Make sure gloves fit properly. Gloves that are too tight or too loose can cause fatigue, and loose gloves can catch on moving equipment or machinery. When handling chemicals, make sure the gloves are cuffed or folded to prevent liquids from entering the glove or coming into contact with your hand or arm. Do not use metal-reinforced gloves when working around electricity.

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Protective Footwear

Employee-provided protective footwear protects against a variety of hazards: impact and penetration hazards, compression hazards, chemical exposure and electrical shock. Protective footwear includes rubber boots, leather boots, steel-toed boots and shoes, and other footwear specifically designed to protect personnel from hazards in the workplace. Safety footwear required for KM employees meets the current ANSI Z-41, latest edition, for 75 foot-pound impact rating and 2,500 pounds compression rating. Impact ratings indicate the ability of the shoe to withstand impact; the ratings are

- 1/30 (up to 30 foot-pounds),
- 1/50 (up to 50 foot- pounds), and
- 1/75 (up to 75 foot-pounds).

Compression ratings indicate the amount of pressure a safety shoe can withstand; the ratings are

- C/30 (up to 1,000 pounds of pressure),
- C/50 (up to 1,750 pounds of pressure), and
- C/75 (up to 2,500 pounds of pressure).

Steel toed footwear is worn when working in the yard, shops, and at field locations. Impermeable rubber or neoprene boots are worn when working with corrosive or hazardous chemicals. Safety toes are made of steel, reinforced plastics or hard rubber, depending on the level of protection required. Rubber boots and shoes with steel toe boxes protect against impact in wet conditions. Puncture-resistant soles are also available.

1. Ensure protective footwear is proper size and fits comfortably when donned.
2. Visually examine footwear before and after each use for foreign material (varies with use); if present, clean using soap and water, rinse thoroughly and allow to dry (rubber footwear) or clean using a damp rag (leather steel-toed boots/shoes).
3. Visually examine footwear for damage (tears, excessive wear, broken stitching, holes); if damaged or if steel exposed, replace footwear.

If your safety shoes become wet, let them dry completely before wearing again. Wearing wet shoes can cause stretching or other distortion that will affect fit. Make sure your shoes have not expanded from pressure from your toes, leaving the toes unprotected by the steel cap.

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Fire Retardant Clothing

Fire Retardant Clothing (FRC) is worn when required by clients or when exposure to hazards is likely.

1. Ensure all protective clothing is proper size and feels comfortable when donned; ensure aprons are knee-length and sleeves reach wrist.
2. Visually examine protective clothing regularly for foreign material (varies with use); if present, wash, rinse thoroughly and allow to dry.
3. Visually examine clothing for damage (tears, holes, discoloration, excessive wear); if damaged or discolored, replace clothing.

Training

Each employee who may need to wear PPE due to existing and/or potential exposures will be trained. Employees will be retrained whenever: there are changes in the workplace that make previous training obsolete; the type of PPE changes; or when an employee demonstrates lack of use, improper use, or insufficient skill or understanding.

Training is accomplished by reviewing the contents of this Policy and Procedure with all affected employees, initially and then annually thereafter. Verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee demonstrate how to properly don, duff, adjust and wear each piece of PPE applicable to their work, and successfully completing a written test (see *Performance-Based Training* section). Training is recorded on a *Training Documentation* form (see *Training Plan*); the *Training Report* is updated to reflect the training received.

Recordkeeping

- *Training Documentation* forms are placed in appropriate HSE files and maintained for two (2) years, then discarded.
- *Performance-Based Training* Tests completed during the training session are attached to *Training Documentation* forms, placed in appropriate HSE files and maintained for two (2) years, then discarded.

Standard: 29 CFR 1910.132-138 (excluding 1910.134 and 1910.137)

1910.38 General requirements. (a) Application. Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respirator, devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a

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manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact. (b) Employee-owned equipment Where employees provide their own protective equipment, the employer shall be responsible to assure its adequacy, including proper maintenance, and sanitation of such equipment

(c) Design. All personal protective equipment shall be of safe design and construction for the work to be performed. (d) Hazard assessment and equipment selection. (1) The employer shall assess the workplace 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 employer shall: (,) 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 (ii) Communicate selection decisions to each affected employee; and, (iii) Select PPE that properly fits each affected employee.

Note: Non-mandatory Appendix B contains an example of procedures that would comply with the requirement for a hazard assessment.

(2) The employer shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed, the date(s) of the hazard assessment and, which identifies the document as a certification of hazard assessment (e) Defective and damaged equipment Defective or damaged personal protective equipment shall not be used.

(f) Training. (1) The employer shall provide training to each employee who is required by this section to use PPE. Each such employee shall be trained to know at least the following: (Q When PPE is necessary; (ii) What PPE is necessary; (iii) How to properly don, doff, adjust and wear PPE; (iv) The limitations of the PPE; and, (v) The proper care, maintenance, useful life and disposal of the PPE. (2) Each affected employee shall demonstrate an understanding of the training specified in paragraph (Q(1) of this section, and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE. (3) When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph (0(2) of this section, the employer shall retrain each such employee. Circumstances where retraining is required include, but are not limited to, situations where: (U Changes in the workplace render previous training obsolete; or (O Changes in the types of PPE to be used render previous training obsolete; or (iii) Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill (4) The employer shall verify that each affected employee has received and understood the required training through a written certification that contains the name of each employee trained, the date(s) of training, and that identifies the subject of the certification. (g) Paragraphs (d) and (f) of this section apply only to §1910. 133, 1910.135, 1919.136, and 1910.138. Paragraphs (d) and (Q of this section do not apply to §g1910. 134 and 1910.137

[Web address is w.cspoaccess.povIecfr in Browse, scroll down to and click "Title 29 –Labor"; click "GO"; search and click 1900-1910 (1901.1-1910.999); search and click 1910.1 to 1910.901-1910.999; search and click "Subpart I Personal Protective Equipment, 1910.132-.138".]

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Hazard Assessment Table: Physical and Health Hazards for Employees

Hazard Sources	Health and Physical Hazards	Protection
Operating power tools: Grinder, presses, saws, drills Using hand tools: hammer, chisel, screw driver, pliers, knives Pressure: pneumatic (blasting, hydraulic at clients facilities)	Impact/penetration: Flying fragments and particles, flying equipment parts, bits, blades, pointed ends	Safety glasses with side shields, prescription glasses with side shields, goggles, Face shield, protective clothing, Gloves See Notes (1), (3), (5), (6), (8), (10)
Lifting and material handling: fork lift, lifting heavy objects/materials Vehicles: cars, trucks	Compression: Crushing, pinching, roll over, fall onto, reaching	Protective footwear (steel-toed), hard hat, Gloves
Hazardous chemicals: Gases, fumes, vapors, mists, dusts(see MSD)	Tissue Damage: Fires, skin and eye irritation, respiratory, IDLH, irritation, poison, chemical burns, carcinogen (all clients' locations)	Safety glasses, particle respirator, particulate mask, chemical gloves, protective clothing, protective footwear see notes (3), (11)
Heat: Welding, cutting, burning, brazing, soldering, electric arc welding, gas welding, gas cutting, torch brazing, torch soldering (at clients facilities)	Hot sparks, burns, splash, slag	Face shields, goggles, spectacles with side protection, protective clothing, leather footwear, leather gloves, long sleeves, welding helmet, cutting goggle; avoid area see notes (1),(2)
Shock: Electrical power cords, tools, receptacles	Tissue Damage: burns, physical injury, death	Shock-resistant hard hat See notes (1), (2)
Light/Radiation: welding, cutting, glare, NORM (at clients' facilities)	Tissue Damage: burns, physical injury, optical radiation, poor vision	Protective eyewear, avoid area
Exposure: weather, animal, insect	Discomfort: High/low temperatures, bites, stings	Protective clothing, slicker suits, vests, acid-resistant rain gear
Noise: machines and equipment (at clients facilities)	Tissue Damage: Hearing loss, physical injury	Ear plugs, Ear muffs
Walking Surfaces: housekeeping, liquids	Injury: Slips, trips, falls	Footwear in good condition

Notes:

- (1) care should be taken to recognize the possibility of multiple and simultaneous exposure to a variety of hazards. Adequate protection against the highest level of each of the hazards should be provided. Protective devices do not provide unlimited protection.
- (2) Operations involving heat may also involve light radiation; as required, protection from both hazards must be provided. (3) Face shields should only be worn over primary eye protection (spectacles or goggles).
- (4) As required by the standard, filter lenses must meet the requirements for shade designations in 1910.133(a)(5). Tinted and shaded lenses are not filter lenses unless they are marked or identified as such.
- (5) As required by the standard, persons whose vision requires the use of prescription (Rx) lenses must wear either protective devices fitted with prescription (Rx) lenses or protective devices designed to be worn over regular prescription (Rx) eyewear. (6) Wearers of contact lenses must also wear appropriate eye and face protection devices in a hazardous environment, it should be recognized that dusty and/or chemical environments may represent an additional hazard to contact lens wearers.
- (7) Caution should be exercised in the use of metal frame protective devices in electrical hazard areas.
- (8) Atmospheric conditions/restricted ventilation of the protector can cause lenses to fog. Frequent cleansing may be necessary. (9) Welding helmets or face shields should be used only over primary eye protection (spectacles or goggles).
- (10) Non-side shield spectacles are available for frontal protection only, but are not acceptable eye protection for the sources and operations listed for 'impact.
- (11) Ventilation should be adequate, but well protected from splash entry. Eye and face protection should be designed and used so that it provides both adequate ventilation and protects the wearer from splash entry.
- (12) Protection from light radiation is directly related to filter lens density (Note 4). Select darkest shade that allows performance.

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Certificate of Assessment

Location KM offices, shop, yard and warehouse located at 1555 Beaulieu Lane, Port Allen, LA

A Hazard Assessment was performed on the following hazard sources at the above location(s):

- Materials, supplies and parts stored and stacked in the Mechanic Shop and Warehouse can fall on people.
- Chemicals located in the Mechanic Shop, Warehouse, Yard and field locations can splash into eyes or onto the body, or be inhaled.
- Electricity in the Mechanic Shop and Warehouse can cause electrical shock.
- Machines and equipment located in the Mechanic Shop and Yard can cause projectiles to be thrown into the eyes, face, head and body.
- Vehicles located at the Mechanic Shop, Yard and in Field locations can roll over feet.
- Dust from machines or equipment or windy conditions in shop and at field locations can get into eyes.
- Light and radiation from welding and culling activities in yard can cause optical radiation.
- Overhead lifting with mechanical lifting devices can cause struck by accidents from bumping or dropping.
- Other _____
- Other _____
- Other _____

The hazards have been evaluated and analyzed, the protection has been identified, and the proper PPE has been provided according to the standards established by KM, NIOSH and ANSI (refer to *Hazard Assessment Table*).

This assessment was conducted and is certified as of July 29, 2010, by the individual(s) identified below:

Conducted by: _____ Certified by: _____

Print name

Print name

Signature

Signature

PREVENTATIVE MAINTENANCE	Issue Date:	Kent Materials
	Revision Date: 12/12/11	

Policy

It is the Policy of Kent Materials that its employees are safe from equipment failure and efficiency loss by ensuring that preventative maintenance is conducted.

Procedures

An inventory of company equipment is maintained by the Operations Manager. This inventory list is kept current with updates whenever new equipment is added or old equipment is removed from service.

The preventative maintenance schedule is based upon manufacturer requirements and industry standards for each piece of equipment in our inventory.

Upon receiving preventative maintenance, a documented record of that service is created and kept for the duration of the life of that respective piece of equipment or machinery.

Any equipment that is found defective is promptly tagged “Out of Service – Do Not Use” and is removed from service until the time in which it has been repaired. Management needs to be notified of any equipment or machinery that has been deemed defective.

SAFE WORK PRACTICES (Slips/Trips/Falls; Proper Lifting; Ergonomics; Work Surfaces, Housekeeping; Ladders; Scaffolds; etc.)	Issue Date: 7/29/2010	Kent Materials
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Policy

It is the policy of Kent Materials (KM) to provide a safe and healthy workplace for its employees by establishing and practicing safe work activities.

Procedure

Employees have a responsibility to be safe and healthy when they work, especially when it applies to conditions they encounter while at work. These conditions include housekeeping and walking/working surfaces; ladders and ladder stands; compressed gas cylinders; materials handling and storage; hand and power tools and equipment; grinders; slip, trip, and fall hazards; lifting, carrying and setting down objects; office safety; building maintenance; and ergonomics. KM Supervisors think about the jobs and activities likely to be accomplished or conducted during the workday, communicate to employees the importance of identifying and eliminating unhealthy and unsafe behaviors and conditions that may result in incidents, and encourage employees to eliminate and/or control the hazards *before* the work begins. This Procedure provides safety information that enables employees avoid and prevent unsafe behaviors and conditions.

NOTE: Always anticipate and think ahead; be prepared to STOP WORK if an unsafe or unhealthy behavior or condition is observed.

STOP WORK Authority

All employees have Stop Work Authority and use it when appropriate. Stop Work Authority is the authority to suspend work activities based on an employee's concern about HSE issues associated with a particular job or work activity. Exercising this authority allows everyone to re-evaluate the situation to ensure everyone's safety and health before proceeding. If an unsafe or unhealthy condition or behavior poses an imminent hazard, employees use the Stop Work Authority and then report the hazard to their Foreman. It is assumed by all levels of management that employees who exercise Stop Work Authority are acting in the best interest of KM and there shall be no negative repercussions to employees for the legitimate use of Stop Work Authority.

Housekeeping and Walking- Working Surfaces/Stairs

Employees make a big difference in the attitudes of their co-workers, by maintaining proper housekeeping standards and safety on walking and working surfaces. Employees must:

- Keep all places of employment, passageways, storerooms, and service rooms in clean, orderly and sanitary condition, free from protruding nails, splinters, holes or loose boards.

SAFE WORK PRACTICES (Slips/Trips/Falls; Proper Lifting; Ergonomics; Work Surfaces, Housekeeping; Ladders; Scaffolds; etc.)	Issue Date: 7/29/2010	Kent Materials
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Housekeeping (continued)

- Keep floor of every workroom in clean and dry condition; where wet processes are used, drainage must be maintained, and false floors, platforms, mats, or other dry standing places must be provided where practicable (especially icy conditions in winter).
- When cleaning up any spilled chemicals, wear appropriate PPE (see MSDS and container label for PPE requirements).
- Post approved design loads for any floor or roof of building or other structure identifying maximum load when storing materials and equipment; weight of stored items cannot exceed maximum approved designed load.
- Keep aisles and passageways clear and in good repairs, with no obstructions across or in aisles that could create a hazard; permanent aisles and passageways must be marked and sufficient illuminated.
- Provide covers and/or guardrails to protect personnel from hazards related to floor openings, floor edges, open pits, tanks, vats, ditches, etc.
- Railings at floor edges must be at least 42 inches tall (top rail), have second rail mid-way between top rail and walking surface, able to withstand 200 pounds top rail pressure.
- While working, pick up tools, equipment and materials not being used, and properly store them to prevent additional housekeeping issues; pick up all waste generated from work tasks.
- Provide protection for floor openings, hatchways, chute openings, skylight floor openings, pits, trapdoors, open manholes, etc. by constructing railings, guards, covers, or some other protection, or have attendance by someone.
- Provide hand railings on one side for stairs with four or more steps; provide railings on both sides for stairs more than 44 inches wide; hold onto handrails with one hand at all times when walking up and down stairways and steps.
- Fixed stairs must be at least 22 inches in width, able to support at least 1,000 pounds, have treads that are slip-resistant, and have a vertical clearance of at least 7 feet.
- Do not take shortcuts (bypass walkways/steps); never run on walkways or stairs.

Ladders and Ladder Stands

Metal ladders, ladder stands and other similar equipment is used when stacking, storing and/or removing materials and supplies manually at heights greater than five feet, and when the use of mechanical equipment and devices are impractical.

- All permanent ladders are secured at both top and bottom; long ladders are secured at intermediate points.
- Safety climbs installed on ladders are used and have safety harness attachments.
- Always face ladder when ascending or descending.

SAFE WORK PRACTICES (Slips/Trips/Falls; Proper Lifting; Ergonomics; Work Surfaces, Housekeeping; Ladders; Scaffolds; etc.)	Issue Date: 7/29/2010	Kent Materials
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- Inspect all ladders periodically (weekly during frequent use) and tag or place out-of-service all defective ladders.
- Rungs of all ladders must be uniformly spaced or meet OSHNANSI specifications.
- Place bases of portable ladders on secure footings, a distance from vertical wall equal to one-fourth (4:1 ratio) of working length of ladder.
- Extension ladders must extend more than 3 feet above tope of landing surface.
- Ensure all ladders are the correct capacity for the task to be performed.
- Use ladders for only the purpose for which they are intended.
- Remove all oil, grease or slippery materials from the ladder and from footwear before climbing.
- Face ladder/ladder stand and hold onto side rails when climbing or descending; do not carry tools, equipment or materials in hands, but in tool belt or pouch, or use a line to raise items after arriving at working elevation.
- The top two rungs or steps of ladders should not be stood on.
- Rungs and steps of portable ladders must be on 12 inch centers, must be slip- resistant, at least 12 inches wide, free of sharp edges/burrs/projections, and designed for one person based on a 200 pound load.
- Maintain all ladders and ladder stands in good, usable condition at all times; remove all foreign materials as soon as detected; defective ladders and ladder stands are marked and taken out of service.
- Rungs and steps of fixed ladders must be at least 12 inches separation, must be slip-resistant, at least 16 inches wide, must be free of sharp edges/burrs/projections, and designed for a 200 pound load.
- Fixed ladders of more than 20 feet are required to have cages, which extend a minimum of 42 inches above the top of the landing to a point between 7 and 8 feet above the base of the ladder and are at least 27 inches in width.
- Ladder stands are designed to accommodate one or more 200 pound persons with a 50 pound load for each, and free of sharp edges, burrs or other hazards.
- Ladder stands with work level platform of 10 feet or more must have a guard rail between 36 and 42 inches high with mid-rail.
- Ladder stand wheels and casters must have at least two functional locking devices to prevent movement when in use.
- Wooden ladders are prohibited.

Slips, Trips, and Falls

Employees prevent slip, trip and fall incidents and injuries by following these safe work practices and recognizing and correcting potential hazards. Employees must:

- Establish and maintain good housekeeping standards in their work areas.
- Look ahead when walking and do not carry large items that block their view, or prevent them from using their hands to brace themselves in case of a slip/trip.
- Recognize potential slip and trip hazards that exist and eliminate them. If hazard cannot be eliminated, it is guarded and communicated to other employees to avoid or to work around area.

SAFE WORK PRACTICES (Slips/Trips/Falls; Proper Lifting; Ergonomics; Work Surfaces, Housekeeping; Ladders; Scaffolds; etc.)	Issue Date: 7/29/2010	Kent Materials
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- Eliminate possibility of others slipping or tripping by wiping up liquid or barricading hazard.

Lifting, Carrying, and Setting Down Objects

Lifting, carrying and setting down objects presents potential hazards that are prevented by using proper techniques. Employees must:

1. Clear a path; remove any obstacles in way and check for slippery surfaces that create an unsafe condition.
2. Take position in front of object when lifting:
 - a. Face object squarely and stand as close to it as possible.
 - b. Place feet about a foot apart, with one foot alongside and one foot behind.
 - c. Lower yourself to object by bending your knees.
 - d. Keep your back straight and your chin level.
3. Grasp object by:
 - a. placing one hand under side of object closest to you,
 - b. placing other hand on top of side of object farthest from you,

Note: The bottom hand supports most of the weight and the top hand keeps the load balanced against your body.

- c. extending fingers and hands around object (use full palm, fingers alone have very little strength), and
- d. keeping your back straight and your chin level, and tucking elbows and arms into side of your body while keeping load close to body.

Note: If the arms are held away from the body, they lose much of their strength. Keep your forearms parallel to the ground.

4. Lift object by:
 - a. Positioning body so weight of object is centered between your feet.
 - b. Slowly straightening your knees; do not twist your body as you lift.

Note: Your legs determine your strength. If the legs and arms are used in this manner during the lift, a back injury is less likely.

5. Carry object to setting down point, keeping correct body position with chin level, back straight and arms tucked into body and parallel to ground.
6. Set object down by:
 - a. facing deposit area squarely so you do not have to twist your body while lowering object,
 - b. spreading your feet about a foot apart,
 - c. lowering yourself and object by squatting/bending your knees slowly,
 - d. while keeping your back straight, your chin level and object close to your body until it reaches the surface, and then
 - e. releasing object and standing.

SAFE WORK PRACTICES (Slips/Trips/Falls; Proper Lifting; Ergonomics; Work Surfaces, Housekeeping; Ladders; Scaffolds; etc.)	Issue Date: 7/29/2010	Kent Materials
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Office Safety

Office safety is often overlooked due to the small number of incidents that occur. However, hazards in every office must be eliminated to heighten awareness.

Employees must:

1. Pick up trash, boxes, and other items that are in walkways that may lead to tripping and falling.
2. Wipe/clean up any spilled material that may lead to slipping and falling.
3. Keep cabinet doors, and filing cabinet and desk drawers closed when not in use.
4. Do not overload electrical outlets. Do not run electrical cords across walkways, run along walls or under a cord cover strip.
5. Keep access to fire extinguishers clear; do not place items in front of fire extinguishers.

Scaffolds

These safe practices are used when working on scaffolds that are 21 feet in height or less; scaffolds greater than 21 feet are periodically checked by properly trained and competent persons. Fall protection is used on scaffolds when work is performed at an elevation of six (6) feet or greater; refer to *Fall Protection Policy and Procedure*.

- Tags must be placed on designated scaffolds and employees must understand and comply with their meanings.
- All personnel must be properly training by a qualified person before being allowed to work on scaffolds.
- Scaffolds are required to have Company's "tagging" system before use.
- Scaffolds and components are capable of supporting without failure at least four times maximum intended load.
- Scaffolds and other devices are maintained in safe condition.
- Scaffolds are not altered or moved horizontally while in use or occupied.
- Any scaffold damaged or weakened from any cause is immediately repaired and is not used until repairs are completed.
- Scaffolds are not loaded in excess of working load for which intended.
- All tube and coupler scaffolds are erected by competent and experienced personnel.
- Posts are accurately spaced, erected on suitable bases, and maintained plumb.

SAFE WORK PRACTICES (Slips/Trips/Falls; Proper Lifting; Ergonomics; Work Surfaces, Housekeeping; Ladders; Scaffolds; etc.)	Issue Date: 7/29/2010	Kent Materials
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- Bearers are installed transversely between posts and are securely coupled to posts bearing on runner coupler; when coupled directly to runners, coupler is kept as close to posts as possible.
- To prevent movement, scaffold is secured to adjacent building or structure.

Hand and Power Tools and Equipment/Guarding

Hand and power tools and equipment (and the guarding of the power tools and equipment) are always maintained in a safe condition and operated in a safe manner, wearing proper PPE.

- Wear eye and face protection when using hand tools (for hitting and striking) and when using all power tools.
- Any hand or power tool not in compliance with the applicable requirement is prohibited.
- Wear proper PPE when necessary for protection from falling, flying and splashing objects, or exposed to harmful dusts, fumes, mists, vapors or gases.
- Grinders, saws and similar equipment must have appropriate safety guards.
- Power tools must have proper shields, guards or attachments.
- Rotating, moving parts must have guards that prevent physical contact.
- All cord-connected, electrically-operated equipment must be effectively grounded.
- Effective guards must be in place over belts, pulleys, chains, sprockets when equipment in use.
- Portable fans must have full guards or screens having openings 1 inch or less.
- Hoisting equipment must be available for lifting heavy objects, and hoist ratings and characteristics must be appropriate for the tasks.
- Ground-fault interrupters must be provided on all temporary electrical 15 and 20 amp circuits used during periods of construction.
- Pneumatic and hydraulic hoses on power-operated tools must be checked regularly for deterioration or damage.
- Tools and equipment must be kept in good condition.
- Hand tools such as chisels, punches, etc. which develop mushroom heads during use must be reconditioned or replaced.
- Broken or fractured handles on hammers, axes and similar equipment must be replaced promptly.
- Tools must be stored in dry, secure locations that prevent tampering.
- Wear eye and face protection when driving hardened to tempered spuds, nails.
- Any tool that is not in compliance (unsafe or original operational integrity has been compromised in any way) must be tagged as inoperable and removed from service.

Grinders

- Adjust work rest on grinder to within 1/8 inch of the wheel.
- Adjust tongue on top side of grinder to within 1/4 inch of the wheel.

SAFE WORK PRACTICES (Slips/Trips/Falls; Proper Lifting; Ergonomics; Work Surfaces, Housekeeping; Ladders; Scaffolds; etc.)	Issue Date: 7/29/2010	Kent Materials
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- Bench and pedestal grinders must be permanently mounted.
- Goggles (safety glasses) and face shields must be worn when grinding.
- Maximum RPM rating of each abrasive wheel must be compatible with RPM rating of grinder motor.
- Fixed or permanently mounted grinders must be connected to their electrical supply system with metallic conduit or other permanent wiring method.
- Each grinder must have an individual on and off control switch.
- Each electrically operated grinder must be effectively grounded.
- New abrasive wheels must be visually inspected, ring tested before mounting.
- Dust collectors and powdered exhausts must be provided on grinders used in operations that produce large amounts of dust.
- Area around grinders must be kept clean.

Building Maintenance

Building maintenance requires daily monitoring to eliminate potential hazards. Employees must:

1. Report light bulbs burned out; change them as soon as possible.
2. Report broken equipment to appropriate maintenance personnel so items may be repaired.
3. Report uneven walkways and stairs to appropriate maintenance personnel so items may be repaired.

Ergonomics

Correcting ergonomic problems makes the employees healthier, more productive and more comfortable. Employees must:

1. Properly set up workstations, minimizing unnecessary movement, to alleviate most upper back, shoulder, eye, hand, and wrist strain:
 - a. Reduce glare on monitor.
 - b. Position monitor and hard copy directly in front of you.
 - c. Move mouse closer and next to keyboard.
 - d. Adjust keyboard height and angle.
 - e. Stop leaning on elbows, or put pads on hard surfaces.
2. Take breaks to relieve physical and mental stress and strain.

Note: Shorter, more frequent breaks are better than longer, less frequent breaks.

3. Perform stretching exercises routinely throughout day to relieve strain and fatigue.
 - a. Stretch fingers, hands and arms outward to exercise those muscles.
 - b. Stand and lean backwards to stretch back muscles.

SAFE WORK PRACTICES (Slips/Trips/Falls; Proper Lifting; Ergonomics; Work Surfaces, Housekeeping; Ladders; Scaffolds; etc.)	Issue Date: 7/29/2010	Kent Materials
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c. Walk around to stretch legs.

4. Alternate tasks to provide rest and relief from physiological stress and strain.

If Safe Work Practices are made part of your everyday routine, it will help ensure an incident-free work environment.

Training

Training is accomplished by reviewing the contents of this Policy and Procedure with all employees, initially and whenever conditions change. Verification of understanding of the information contained in this Policy and Procedure is accomplished by the Operations Manager observing how the employees perform the demonstrations and the employees successfully completing a written test (see *Performance-Based Training* section). Training is recorded on the *Training Report* to reflect the training received.

Note: Additional training may be necessary if employees do not have the knowledge or skills to demonstrate these safe work practices.

Training must also address hazards associated with other policies and procedures: fall protection, electrical safety, falling objects, load capacities, confined spaces, etc.

Recordkeeping

- Performance-Based Training written tests completed during the training session are placed in appropriate HSE files and maintained for two (2) years, then discarded.
- Copies of *Inspections* are placed in appropriate HSE files and maintained for two (2) years, then discarded.

Standard: see below for specific application.

[Web address is www.gpoaccess.gov/lecf in *Browse*, scroll down to and click “Title 29 – Labor”; click “Go”; search and click 1900-1910 (1901.1-1910.999); search and click 1910.1 to 1910.901- 1910.999; search and click specific section required: 1910.24 Fixed industrial stairs; 1910.26 Portable metal ladders; 1910.27 Fixed ladders; 1910.30 Other working surfaces; 1910.37 Maintenance, safeguards and operational features of exit routes; etc.]

STOP WORK AUTHORITY	Issue Date:	Kent Materials
	Revision Date: 12/12/11	

Policy

It is the policy of Kent Materials to provide its employees with the safest work environments possible by allowing employees to stop work activities that they deem unsafe.

Procedure

All employees have the authority to stop work performed by Kent Materials employees, client employees and any sub-contracted employees at any time if any HSE (Health, Safety and Environmental) concerns should arise or if there is not a clear understanding regarding the control of risks. If an HSE concern is identified, the employee, the supervisor and the Operations Managers roles and responsibilities are as follows:

1. Employee informs all affected persons in the immediate area that they are initiating a SWA.
2. Employee notifies their immediate supervisor and the client representative of the SWA.
3. Employee participates, if applicable, in addressing, abating or resolving the concern.
4. Employee resumes work only once it is determined safe to do so.
5. The supervisor documents the details of the SWA.
6. The supervisor provides a copy of the documented SWA to the client representative and to Kent Materials Operations Manager.
7. The supervisor verbally communicates the details of the SWA to employees and to Kent Materials management soon after the occurrence.
8. The Operations Manager reviews the submitted SWA in order to determine any additional corrective actions needed for improvement.
9. The Operations Manager initiates a follow-up to corrective actions initiated from the SWA to ensure that they are satisfactorily closed and any corrective actions have/are taken.

Employees will not be subject to reprimand, retribution or intimidation for issuing any stop work authority.

All work will be suspended (put on hold) until all issues and concerns have been addressed, abated or resolved.

STOP WORK AUTHORITY	Issue Date:	Kent Materials
	Revision Date: 12/12/11	

Documentation of SWA's allows management to determine and institute corrective actions needed to avoid re-occurrence, and to share lessons learned.

Responsibilities

Management is in full support that work should be stopped if any HSE concerns are present. Management is expected to broach the subject of SWA whenever possible, such as in tailgate safety meetings and when conversing with employees at worksites.

Employees will be encouraged to initiate SWA by their supervisors. Employees are not only encouraged to initiate SWA but are expected to do so if HSE concerns are present.

Employees are expected to issue an SWA when the control of the HSE risk is not clearly understood or established.

Training

Each employee who will work at any client worksite will receive SWA training prior to initial work assignment. Training is documented on a Training Register and it includes the subject name, the employee name and date in which the training was provided.

Training is accomplished by reviewing the contents of this Policy and Procedure with all affected employees, initially and then annually thereafter.

SHORT SERVICE EMPLOYEES (SSE)	Issue Date:	Kent Materials
	Revision Date:	

Policy

It is the policy of Kent Materials to protect our new employees from unsafe and unhealthy conditions and behaviors during the first six (6) months of employment.

Procedure

Short Service Employees (SSE) are defined (for the benefit of our clients) as Kent Materials employees with less than six (6) months of employment; an SSE (for the benefit of Kent Materials) is an employee with less than two (2) months of employment. This includes an employee newly-hired, appointed to a new job assignment, and exposed to new substances, processes, procedures, equipment, etc. that present a new hazard. At no time is an SSE allowed to work alone. An SSE Mentor is an employee assigned to supervise the new employee's work to protect him/her from unsafe and unhealthy conditions and behaviors; the Mentor must have at least one (1) year of experience working for Kent Materials, work in the same craft as the SSE, and be well-versed in health, safety and environmental procedures. The mentor is only assigned to a single crew that includes SSE(s), and remains with them onsite.

Customers

The Foreman accomplishes the following:

1. Completes clients' short service employee form on employee(s) scheduled to work at client locations (see attached: Chevron and ExxonMobil SSE forms).
2. Notifies client of status of SSE employee(s) before employee(s) begins work.
3. provides original to clients' representative(s); this serves as notification, including variances.
4. obtains written approval from clients' representative(s) to use SSE; this includes variances to clients' established policies.
5. Makes copy of SSE form and places in Kent Materials HSE files.

Note: The number of Short Service Employees performing work is dictated by the client; refer to client form to determine actual number.

Mentoring

Mentoring is a process of transferring skills and knowledge from one person to another in a work environment; mentoring is recognized as a valuable component of the training process. Mentors strongly believe in the importance of working safely at all times, and have the people skills to guide and protect the Short Service Employee in his/her care. The

Mentor is seldom the Foreman, but directly supervises an SSE for a minimum of six (6) months. The mentor must:

- have desire, a patient disposition, and be willing to devote time as a mentor.
- possess knowledge and skills in a particular area required by SSE.
- be willing and able to effectively listen to SSE to determine if SSE is learning and retaining the knowledge and skill being shared.
- be willing to watch SSE perform a job without interfering as long as SSE is not in position to harm himself/herself or others, or damage equipment or environment.
- provide a positive safety attitude, avoid criticism and strive to build confidence and self-esteem in SSE.
- be able to coach, educate, train and monitor SSE in proper HSE procedures.
- keep abreast of new equipment and changes in methods of operating present equipment in his/her field of expertise.
- refrain from taking shortcuts or perform any “at risk” behaviors.
- be able to teach SSE correct steps used in behavioral process and furnish positive feedback reinforcement.
- teach SSE his/her role as an observer in behavior process.
- exhibit positive expressions and ideas, and refrain from negative ideas about his/her peers, supervisors and subordinates.
- demonstrate a positive work ethic at all times.
- tell SSE when he/she is not performing up to standards, without criticizing; with SSE input, discuss what is needed, what is goal, and what is proper way to accomplish task.
- improve his/her own skills in order to enhance his/her own ability to coach, educate and train others.

The SSE Mentor provide close supervision, do not allow the SSE to perform any task for which the SSE has not been properly trained, and ensure the SSE understands the tasks to be performed and their hazards before performing any work.

The Foreman and/or SSE Mentor issue the new employee a hard *orange colored* hat (exclusive for SSE’s) and/or SSE stickers to be placed on the hard hat according to the client’s policy. The SSE wears the SSE hard hat (with/without sticker) while on worksites, facilities and boats. The hard hat and/or stickers are provided by Kent Materials and/or obtained from the client representative. The Foreman and/or SSE Mentor provide:

1. An orientation for SSE that consists of following:
 - Worksite briefing that addresses applicable:
 - o Company HSE Policies and Procedures.
 - o client-specific rules and requirements; HSE Policies and Procedures.
 - o safety-related protective measures prior to arrival in the workplace (proper clothing, safety equipment, proper lifting techniques, correct tools, over-water safety, helicopter safety, etc.).
 - Tour of facility/worksite, especially areas where SSE will be working.

SHORT SERVICE EMPLOYEES (SSE)	Issue Date:	Kent Materials
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2. Training that includes following:

- Hazards present in workplace.
- HSE Policies and Procedures, processes and PPE to prevent these hazards from causing injuries, property damage and/or environmental incidents.
- Skills necessary to perform assigned jobs safely and effectively while providing product quality and economy.

3. Supervision and/or mentoring during all work activities and assignments; if SSE is unsafe or unhealthy during mentoring process, additional coaching is provided.

To be removed from SSE status, the employee must exhibit safe behavior for up to six (6) months of employment for clients and up to two (2) months at Kent Materials: i.e., incident-free performance, proactive participation in the HSE procedures (such as incident reporting), and have a general awareness and working knowledge of the HSE Procedures. The Foreman and Mentor must complete, sign and date a letter at the end of the six month period stating the SSE has successfully completed the program.

NOTE: Kent Materials does not hire subcontractors.

Training

Training is accomplished by reviewing the contents of this Policy with all Mentors when first selected as mentor and as needed thereafter, and then having each mentor accurately complete and sign the client's SSE form (see *Performance-Based Training* section). Training is recorded on a *Training Documentation* form (see *Training Plan*); the *Training Report* is updated to reflect the training received.

Recordkeeping

- *Training Documentation* forms are placed in appropriate HSE files and maintained for two (2) years, then discarded.
- Performance-Based Training *Short Service Employee* forms completed during the training session are attached to *Training Documentation* forms, placed in appropriate HSE files, and maintained for two (2) years, then discarded.
- Actual signed and dated *Short Service Employee* forms are placed in employees' personnel files for two (2) years, then discarded.
- Letters generated at end of short service period are placed in employees' personnel files for two (2) years, then discarded.

Standard: Best Practice

Contractor Short Service Employee Form

Contractor must complete and submit form to the Operator location supervisor for approval prior to arrival on location. The Operator location supervisor (Field Supervisor, Drilling Supervisor, OIM) must approve the individual SSE before he/she arrives on location

Contractor Company Name: _____ Request Date: _____

SSE Name: _____

Date of Employment: _____ Years Oil Field Exp: _____

Current Job Title: _____ Experience in Present Position: ____ Yrs ____ Mos

1. Is this employee in compliance with your Substance Abuse Program? ____ Yes ____ No

2. Has CVX GOMBU and Contractor HSE policies been reviewed with SSE? ____ Yes ____ No

By whom? _____

3. Who has been assigned as the SSE Mentor? _____

Mentor's experience in present position (yrs and mos): _____

4. List all of the training you provided for the SSE: _____ List previous special training: _____

5. SSE(s) is identified by ☐ Hard Hat — Hi Vis Orange

SSE Crew Makeup Requirements:

Choose one of the crew types below. If any of the limitations are exceeded, proceed to the variance form on the reverse of this page.

- ☐ Single person crew — cannot be a SSE (**Variance Required**)
- ☐ 2-4 person crew — no more than 1 SSE per crew
- ☐ 5 or more person crew — no more than 20% per crew
- ☐ Exceeding 20% per crew (Variance Required)

SSE Review and Approval:

Contractor's Management

Date:

Operator Location Supervisor

Date:

Joint Operator SSE Authorization and Variance Form

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This form is to be used in the event there is variance from the Operator Short Service Employee Policy.

Variance Justification (What are the current circumstances and what will be done to ensure an acceptable level of risk?)	
Alternatives to Variance (If the variance is denied, what are the alternatives to completing the scope of the work? Briefly detail the cost and operational impact of the alternatives.)	

List the action plan steps that will be taken to manage the SSE risk to acceptable level.

1. 2. 3. 4. 5. 6. 7. 8. 9. 10.

Variance Expiration Date: _____
(Date variance is expected to end.)

Operator Location Supervisor:

Approved: _____

Rejected: _____

Manager! Supervisor:

Approved: _____

Rejected: _____

SHORT SERVICE EMPLOYEES (SSE)	Issue Date:	Kent Materials
	Revision Date:	

Attachment A

CONTRACTOR EMPLOYEE PRE-MOBILIZATION /SSE FORM

INSTRUCTIONS:

This form must be completed for each contractor employee verified by the contractor management and submitted to ExxonMobil for approval **prior to** mobilization. Employees with /less *than 6 months of continuous service* with your company require additional approvals before they are allowed to work on an ExxonMobil location. You **MUST** review your training/monitoring plans for all SSEs with the ExxonMobil Job Supervisor. Use the back of this form to add any additional comments as you see appropriate.

CONTRACTOR CO. NAME: _____	REQUEST DATE: _____
EMPLOYEE NAME: _____	DATE OF EMPLOYMENT: _____
HOME ADDRESS: _____	CO. SERVICE (YRs/MO5) _____
CITY/STATE/ZIP _____	YRs OIL FIELD EXP. _____
Unique Employee ID# _____	YRs OFFSHORE EXP. _____
CURRENT JOB TITLE: _____	EXP. IN PRESENT JOB _____

EMPLOYMENT INFORMATION: Last 3 years— Use back page if needed. (Please explain gaps between employment)

PREVIOUS EXPERIENCE	JOB TITLE	DATE OF EMPLOYMENT	DATE OF DEPARTURE
Are You a member of one of the following consortiums?	DISA	Drug Screen Compliance	

Is Employee in compliance with ExxonMobil's Contractor Drug policy? _____ Enter date of last test _____

Is Employee in compliance with ExxonMobil's Contractor Alcohol policy? _____ Enter date of last test _____

If "Security Sensitive" Contract Employee (determined by ExxonMobil representative), enter date of last background screening? _____

If working in GOM, date last viewed the training video "**All Washed Up: The Beach Litter Problem**"? _____

Safety Pm-Mob Package Review Location _____ Site Specific Orientation: Location, _____

Date _____ Date _____

Has Employee been medically approved to wear a respirator (If applicable)? _____ Date/Type of last respirator fit test? _____

1-12S Training Date (If applicable)? _____ If so, by whom? _____

Benzene Awareness Training Date (If applicable)? _____

List any special training / certification: _____

Employee qualified as a (list crafts): _____

Please complete this section if employee has less (has 6 months of continuous service:

Previous ExxonMobil & supervisor SSE worked for:
How do you identify SSE (i.e., hard hat, sticker, etc.)?
Who has been assigned to train/mentor the SSE?
Define the roles and responsibilities of the mentor:
DOT Qualified Yes No
List all training you have provided for SSE:

APPROVAL/ENDORSEMENT

Employee signature (Required) DATE	EXXONMOBIL Field supervisor or Conntn,clion Tech Foreman or workover supervisor (Required for 1 SSE) DATE
Contractor supervisor/ Manager (Signature Required) DATE	ExxonMobil. Above signature Required and Field superintendent or Conntnsction Supervisor or Workover coordinator (Required for 2 SSEa) DATE
COMPANY TELEPHONE NUMBER FAX NUMBER	EXXONMODIL. Above Signature Required sad Operation Superintendent (Required for 3 SSEa) DATE ExxoNMomL Above Signatures Required and construction projectgMsnager or Orations Mtnar Qte4lired for 4 or more SSEn) OATH

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Posted on GlobalShare— US Production Business Processes\General\Contractor Pre-Mob Package I-I 1-06 doc

SPILL PREVENTION/RESPONSE	Issue Date:	Kent Materials
	Revision Date:	

Policy

It is the policy of Kent Materials that all appropriate measures are taken to avoid chemical release / spills, and if one were to occur appropriate actions would be taken in response.

Procedure

In effort to minimize overall exposure, the following practices are adhered to:

- Only minimal amounts of chemicals needed to perform work are kept on hand. All chemicals are kept in their proper containers, with their lids closed and stored so they are not exposed to stormwater.
- Proper spill kits containing appropriate supplies are maintained for the type and quantities of chemicals handled.
- Spill kits are readily and easily accessible when needed.
- Best management good housekeeping practices are used where chemicals are used or stored; including clean and organized storage practices, proper chemical container labeling, and secondary containment when applicable.

In the event that a spill should occur that involves any non-toxic, non-corrosive chemical in quantities less than 5-gallons, employees are to immediately notify a supervisor and then begin spill response.

If a toxic or corrosive chemical in excess of 1-gallon should spill, employees notify their immediate supervisor or a member of management.

Training Program

Kent Materials trains employees who are expected to prevent and/or respond to a spill. The training program is provided before initial assignment and is repeated annually. Information provided in the training program ensures each employee is informed of the following:

- Proper spill prevention and response procedures.
- Materials available for use.
- Proper waste disposal.
- Communication procedures.

Kent Materials	Policies and Procedures	Issue 10-10-03
	WELDING AND BURNING	Rev. date 4/19/2011

Purpose

The Welding and Burning Policy and Procedure provides Kent Materials (KM) with a means to ensure that our employees are knowledgeable of the potential hazards that can occur during welding or burning operations and how to protect themselves and others.

Policy

It is the policy of Kent Materials that our employees work safely when conducting welding and burning activities.

Procedure

The following procedure is used for welding and/or burning activities. KM Supervisor ensures these steps are followed:

1. Determine the welding and/or burning activity to be performed, when and where it is to be performed, and whether the activity is to be performed by employees or contract personnel, including welder, welder's helper(s) and fire watch.
2. Verify fire watch person is properly trained to perform the job:
 - Trained in the use of fire extinguishers, basic firefighting equipment and insipient stage fire fighting.
 - Trained to test for oxygen-deficient atmospheres and the presence of flammable, combustible and/or toxic gases and vapors.
 - Familiar with the facility's alarm in the event of a fire.
 - Familiar with the requirements to remain at the location for one-half hour after completion of the activity or as directed by the Supervisor.
 - Equipped with a fully-charged extinguisher in good working condition, capable of extinguishing the worst case anticipated fire.
3. Complete the Welding and Burning Permit as follows:
 - a. Section I – Work: enters the date and time the activity is expected to start and end; the name of the person for whom the permit is issued; the fire watch person's name; a description of the work to be performed; the specific location of the work; and the number of workers involved in the activity.
 - b. Section II – Emergency/Vapor Test: name(s) of the emergency service(s) and telephone number(s) to call if an emergency occurs, and the results of the different tests conducted during the activity with the tester's initials.
 - c. Section III – Site Inspection: verification of the precautions taken and inspections conducted to ensure that the welding and/or burning operation is safe.
 - d. Section IV – PPE: place a check mark (‘1’) in the spaces provided for all of the PPE required for this activity, and a safety meeting is conducted.

Kent Materials	Policies and Procedures	Issue 10-10-03
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e. Section V –Signature: signatures of the various key participants indicating that they “have received instructions on safety precautions and hazards of this job and the permit is complete”.

4. Prepare the location where the welding and/or cutting activity is to take place, to ensure that:
 - All passageways are clear and easily accessible.
 - Item(s) to be welded/cut are in an area free of flammables and combustibles; if not, move the item(s) or remove the flammables and combustibles (spilled oil or fuel, paints, wood products, etc.)

Note: Establish a distance of 35 feet between welding/cutting activity and flammables/ combustibles or place a fire wall between the activity and the flammables/combustibles.

- Welding and/or cutting equipment is safe to use: welding leads are securely installed and in good condition, welding electrode holder is in good condition, and oxygen and acetylene bottles are secure, their hoses are free of cracks, cuts and leaks, and they are equipped with proper fittings, gauges and regulators.
5. Ensure that all of the workers have the proper PPE to perform the work:
 - Protective clothing: long sleeve shirts to protect the arms; protective footwear appropriate for welding (i.e., leather boots); long pants worn on the outside and over the boot; and leather gloves or a type rated for welding activities.
 - Eye and face protection: welding helmets with face shields, and welding goggles or spectacles with the proper shading to protect against optical radiation and glare from electric arc welding, gas welding, and/or cutting.

The following is a guide for the selection of the proper shade numbers in welding operations:

- Shielded metal-arc welding: 1/16”, 3/32”, 1/8”, 5/32” electrodes 10
- Gas-shielded arc welding (non-ferrous): 1/16”, 3/32”, 1/8”, 5/32” electrodes 11
- Gas-shielded arc welding (ferrous): 1/16”, 3/32”, 1/8”, 5/32” electrodes 12
- Shielded metal-arc welding: 3/16”, 7/32”, 1/4” electrodes 12
- Shielded metal-arc welding: 5/16”, 3/8” electrodes 14
- Atomic hydrogen welding 10-14
- Carbon arc welding 14
- Soldering 2
- Torch brazing 3 or 4
- Light cutting, up to 1” 3 or 4
- Medium cutting, 1” to 6” 4 or 5
- Heavy cutting, 6” and over 5 or 6
- Gas welding (light), up to 1/8” 4 or 5
- Gas welding (medium), 1/8” to 1/2” 5 or 6
- Gas welding (heavy), 1/2” and over 6 or 8

Note: In gas welding or oxygen cutting where the torch produces a high yellow light, it is desirable to use a filter or lens that absorbs the yellow or sodium line in the visible light of the operation.

Kent Materials	Policies and Procedures	Issue 10-10-03
	WELDING AND BURNING	Rev. date 4/19/2011

6. Conduct a safety meeting to review and discuss the Permit with all of the workers to ensure that they are familiar with the safety requirements associated with this activity.

7. Conduct the welding and/or burning activity. During the activity, ensure that the workers are aware of and accomplish the following:

- Aware of potential fire hazards around the welding area.
- Aware of operating conditions that may increase the potential for fire.
- Inspect and use all PPE appropriate for the welding and burning tasks.
- Place all welding and/or burning equipment in a safe position.
- Remove all electrodes from holders and shut off all welding machines when welding activities are suspended or completed.
- Close all oxygen and acetylene cylinder valves when cutting activities are suspended or completed.
- If the welding or burning activity is stopped for more than one hour, inspect the site for potential fire hazards before starting the activity again.

8. Upon completion of the welding and/or burning activity, remove the Permit and send it to the office for filing.

Following the steps outlined in this procedure reduces the risk, associated with welding and/or burning, to employees by ensuring that they are knowledgeable of the potential hazards that can occur and how to protect themselves and others.

Kent Materials	Policies and Procedures	Issue 10-10-03 Rev. date 4/19/2011
	WELDING AND BURNING	

SECTION I	WORK	Effective _____ Time _____ AM/PM Expries _____ Time _____ AM/PM _____ (PERMIT VALID FOR DURATION OF JOB, OR UNTIL SHIFT CHANGE, WHICHEVER COMES FIRST)													
		Permit Issued To:													
				Name:				Designated Fire watch							
		Description of work:													
		Specific Location:						No. of Workers							
SECTION II	EMERGENCY/ VAPOR TEST	EMERGENCY SERVICE				ATMOSPHERIC TESTING RECORD									
		Name of Service		Phone #				Acceptable Range		Tester's Initials:					
						Time									
						Oxygen		19.5%-23.5%							
						Flammables		0-10% LFL							
						H2S		0-10 PPM							
						Toxics		0							
SECTION III	SITE INSPECTION	INSPECTION ITEMS			Verified		N/A		INSPECTION ITEMS			Verified		N/A	
		Designated Fire Watch has adequate fire extinguisher and/or changed fire hose at the site during the welding and burning.							Welding equipment and leads in good condition and are not creating a rip hazard.						
		Atmosphere tests for safe Oxygen content flammables, and toxics (O2, LFL/LEF, and H2S) are performed							There are no combustible materials on the backside of are and Fire Watch is posted.						
		Drains/vents within a 35 feet (minimum) radius are sealed and adjacent areas inspected.							Oil and other combustible materials have been cleared from equipment to be welded.						
		Hydrocarbon/Flammable sources located within 35 feet or work site relocated, rendered inert, or protected with flameproof covers/shields.							Engine-driven welding machines are equipped with spark arrestors, emergency shutdowns (EDS) are drip pans.						
		Oxygen and acetylene bottles secured in a safe place.							Applicable Safety systems are bypassed, flagged, logged and monitored.						
		Welding curtains and shield are erected.							Pre-job safety meeting conducted						
SECTION IV	PPE	Hard Hat Safety Glass Steel Toe Boots Gloves (cotton, leather, chemical) Safety Harness/Retrieval Line Anti-Fall Device				Face Shield Safety Goggles Protective Clothing Rubber Boots Welders Helper Glasses				Rescue Retrieval Winch SCBA Cartridge Respirator Dust Mask Other					
SECTION V	SIGNATURE	We have received instructions on safety procedures and hazards of this job and the permit is complete.													
		Permit Initiator (KM Supervisor)													
		Fire Watch (s)													
		Must monitor area for 30 minutes after completion of welding and burning													
		Simulations Operations/Co-Signatures													

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Health Policies and Procedures

- Access to Employee Exposure and Medical Records
- Alcohol, Drug and Contraband Policy
- Bloodborne Pathogens (Exposure Control)
- First Aid/CPR
- Hazard Communication
- Hearing Conservation
- Hydrogen Sulfide (H₂S)
- Respiratory Protection

Kent Materials	Policies and Procedures	Issue 9-9-03
	ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS	Rev. date 4/19/2011

Purpose

The Access to Employee Exposure and Medical Records Policy and Procedure provides the company with a method to communicate information contained in the program. This policy and procedure provides Kent Materials (KM) employees with the necessary information to obtain their medical records (29 CFR 1910.1020).

Policy

It is the policy of Kent Materials to provide all employees with the necessary information to understand their rights of access to employee exposure and medical records.

Procedure

Employees have the right of access to their exposure and medical records. The following records are maintained by KM personnel and are available to employees upon written request:

- Exposure records relevant to employee's actual potential exposure.
- Employee's medical records (other than first aid cases).
- Analyses using exposure or medical records concerning his/her working conditions or workplace.
- OSHA's rule regarding access to employee exposure and medical records.

If an employee is interested in reviewing or copying any of these records, the employee contacts his/her immediate Supervisor and the necessary arrangements are made. Employees follow the steps as described in the following sequence to obtain his/her record(s).

1. Employee notifies the respective KM Supervisor verbally that he/she would like to access his/her exposure and/or medical records.
2. Supervisor contacts the Office Manager to inform them that the employee or his/her representative has requested access to his/her records.
3. Manager obtains copies of all medical files from the doctor's office and/or customer's office and places them in the employee's medical file.
4. The Supervisor and Manager determine when all of the records will all be available at the KM office and when the records can be accessed by the employee or representative.
5. Supervisor communicates to the employee a date and time he/she or representative can access the records or reason for delay and the earliest date records will be available.
6. Employee and/or representative arrive at the KM office, complete the *Written*

Kent Materials	Policies and Procedures	Issue 9-9-03
	ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS	Rev. date 4/19/2011

Authorization for the Release of Exposure and Medical Records form (see attached), and sign it.

7. Manager signs and dates the form and presents the document to the employee and/or representative.

8. Upon request, the Manager makes copies of the records and presents them to the employee and/or representative, at no cost to the employee. If copies of the records cannot be made (i.e., X-Rays), the employee and/or representative are allowed to review them, or at the discretion of KM, borrow them temporarily.

9. Manager returns the original records and release form to the employee's file when employee and/or representative are finished accessing them.

Whenever a record has been previously provided without cost to an employee or representative, KM may charge reasonable, non-discriminatory administrative costs (i.e., search and copy expense but not including overhead expenses) for a request by the employee or representative for additional copies of the record.

Distribution of Information

Annually (in the first quarter of each calendar year), Manager notifies all employees of the following in a pay envelope:

- The existence, location and availability of the employee records.
- The person responsible for maintaining and providing access to employee records.
- Each employee's rights of access to these employee records.
- Access to the latest copy of the regulation (29 CFR 1910.1020).
- Any informational materials concerning employee records made available to KM by OSHA.

[The web address for a current copy of the standard is www.osha.gov Search "1910.1020"; double click "1910.1020 Access to employee exposure and medical records".]

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**WRITTEN AUTHORIZATION FOR THE RELEASE OF
EMPLOYEE EXPOSURE AND MEDICAL RECORDS**

I, _____, hereby authorize Kent Materials and its
(Print Full Name of Employee)

Representative _____
(Print Name of Individual or Organization Authorized to Release Records)

to release to _____
(Print Name of Individual or Organization Receiving Records)

the following medical information from my personal medical records (describe in detail):

I give my permission for this medical information to be used for the following (describe):

Name of Employee or Representative

Name of Person Releasing Records

Signature of Employee or Representative

Signature of Person Releasing Records

Date Written Authorization Expires

Date of Signatures

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ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS

Kent Materials is required to notify each employee annually (in the first quarter of each calendar year) of the following:

- Kent Materials Employees' Exposure and Medical Records are maintained at the following address:

Kent Materials
1555 Beaulieu Lane
Port Allen, LA
225-930-4512

- Employees and/or their representatives can obtain access to these records Monday through Friday (except holidays) between the hours of 8:00 AM and 5:00 PM (CST).
- Manager is responsible for maintaining employee records, providing access to these employee records, and providing a copy of the latest edition of *29 CFR 1910.1020* (the *Access to Employee Exposure and Medical Records* standard).

Note: All OSHA informational materials concerning employee records made available to Kent Materials during the course of this last year are included in this mailing.

Kent Materials, Inc.

ALCOHOL, DRUG AND CONTRABAND POLICY

EFFECTIVE DATE: 05/26/2011

Approved by: Karl Geist

For the purpose of this policy “company” shall refer to: Kent Materials, Inc.

Kent Materials, Inc. SUBSTANCE ABUSE POLICY

1.0 PURPOSE

To insure a safe, healthy, and productive work environment for the employees of Kent Materials, Inc... *Customers* and others on company/customer Property, to protect company/customer Property and assets and to ensure efficient operations, company shall have and enforce a written policy on drugs and alcohol which complies with the laws of the states in which the company performs services for customers.

2.0 DEFINITIONS

A. *Company Personnel* any company's employees, agents, subcontractors or subcontractors' employees performing field operations work on company and/or customer Property. This includes temporary and part-time personnel.

B. Kent Materials, Inc. and/or customers *Property* All real or tangible personal property, including facilities, buildings, vehicles, products and equipment, either owned or controlled by Kent Materials, Inc. and/or Customers.

C. *Prohibited Substances* (1) illicit or unprescribed drugs, controlled substances and mood or mind-altering substances (i.e. any synthetic derivative/product that produces a marijuana-type high and any herbal products not intended for human consumption), (2) prescribed drugs used in a manner inconsistent with the prescription and (3) alcoholic beverages.

D. *Reasonable Suspicion* A belief based on objective and articulable facts sufficient to lead a supervisor to suspect use of Prohibited Substances.

E. *Under the Influence* (1) the presence of a Prohibited Substance or metabolites of a Prohibited Substance in body fluids above the cut-off level established by Contractor's Policy or other commonly accepted cut-off level and/or (2) the presence of a Prohibited Substance that affects an individual in any detectable manner. The symptoms of influence may be, but are not limited to, slurred speech or difficulty in maintaining balance.

3.0 PROHIBITIONS

Unless specifically authorized in writing by company and/or customers, Kent Materials, Inc. Policy shall prohibit company Personnel from the following:

A. Using, possessing, selling, manufacturing, distributing, concealing or transporting on company and/or customer Property any of the following items:

- i. Any Prohibited Substance;
- ii. Contraband, including firearms, ammunition, explosives, and weapons;
- iii. Illicit drug equipment or paraphernalia.

B. While on company and/or customer Property, possessing or using prescription drugs or over-the-counter medication that may cause impairment, except when all of the following conditions have been met:

- i. Prescription drugs have been prescribed by a licensed physician for the person in possession of the drugs.
- ii. The prescription is not expired and was filled by a licensed pharmacist for the person possessing the drugs
- iii. The individual notifies his/her supervisor that he/she will be in possession of, or using, impairment-causing prescription drugs or over-the-counter medication and appropriate steps are taken to accommodate the possibility of impairment, including but not limited to, removal from work for the period of possible impairment.

C. Being under the Influence of Prohibited Substances while performing any work for company and/or customers.

D. Switching or adulterating any urine, blood or other sample used for testing.

E. Performing work for company and/or customers when an individual has tested positive or refused testing in any employment-related test.

4.0 SEARCHES AND INSPECTIONS

On company and/or customer property, at any time, company and/or customer supervisors, Contractor supervisors and/or authorized search and inspection specialists, including scent-trained animals, may conduct unannounced searches and inspections of company and/or company Personnel and their property. That property may include, but is not limited to, wallets, purses, lockers, baggage, offices, desks, toolboxes, clothing and vehicles.

5.0 TESTING

A. Requirements

i. Pre-Access Testing:

a. All company Personnel are subject to “customer” pre-access testing which might mandate that the employee(s) receive a negative result on a drug and/or alcohol test within 60 days or less preceding the company Personnel’s first access to customer Property (some clients will accept if employees are currently active in a DOT random testing pool). Annual drug and alcohol testing also required by specific customers. Upon customer’s request, company shall so certify in writing. A single letter certifying negative test results for all Contractor Personnel requiring site access is preferred.

b. Company will provide no information to customers identifying individuals who have positive pre-access tests.

H. Post-Incident Testing:

a. If company and/or customers determine from the best information available immediately after a work-related Incident that performance of one or more company Personnel contributed to the Incident, or cannot be completely discounted as a contributing factor to the Incident, company shall remove that/those individual(s) from customer Property and surrender his/her site credentials to the customers. For purposes of this part “Incident” means an event that causes personal injury requiring medical treatment beyond first aid administered at the work site, or property damage of more than \$1,000 or an event that carried the potential for serious personal injury or significant property damage.

b. An individual so removed will be allowed to return to work on customer Property only after company conducts alcohol and drug testing on the individual as soon as possible following the individual’s removal from the site, and the Contractor certifies in writing the test identification number, the individual’s social security number (last 4 digits), the test date and time and a negative test result. On that written certification the company will include a consent signed by the individual permitting disclosure to customers of the test result.

iii. Reasonable Suspicion Testing:

a. Upon Reasonable Suspicion of company and/or customers that company Personnel is Under the Influence of a Prohibited Substance while on company and/or customer Property, company shall remove the individual(s) from customer Property and surrender his/her site credentials to the customers.

b. An individual removed from company and/or customer Property for Reasonable Suspicion will be allowed to return to work on company and/or customer Property only after company conducts alcohol and drug testing on the individual as soon as possible following the individual's removal from the site, and the company certifies in writing the test identification number the individual's social security number (last 4 digits), the test date and time and a negative test result. On that written certification the company will include a consent signed by the individual permitting disclosure to customers of the test result.

iv. Random Testing

If specific customers require random drug and/or alcohol testing then the following guidelines will be followed.

Unless otherwise specified by DOT, company employees shall be subject to unannounced random testing for the 5 DOT substances as well as barbiturates, benzodiazepines, methadone, and propoxyphene on a random basis that will yield a compliance of an annualized rate of at least 50% (unless set at a lower rate by a specific client) spread reasonably throughout the year. If required by the specific client, a breath alcohol test will be given at the same time as the drug test. Upon notification of a drug and/or alcohol test, company employee must report to the collection site within 60 minutes, plus travel time. Failure to report to the collection site, refusal to test, or adulterating a specimen is considered the same as a positive test and individual will not be allowed on company and/or customer premises.

v. Wall-to-Wall Testing

Company employees on certain customer premises are subject to unannounced en masse drug & alcohol testing. Such tests are scheduled at the sole discretion of specific customers. This includes the determination of the scope for such testing in addition to the timing of such testing. The scope of such testing will be determined by the customer in terms of a group of company employees to be tested. Such a group will include all members of the named group on site at the determined time or time period and shall not be determined in terms of named individuals. Such groups may include, but are not limited to, all company employees on site, or by shift, by crew, by location, by craft, by company or by another similar category, including a random selection based on site access records.

The Substance Abuse Policy requires the use of Department of Health and Human Services (DHHS) certified laboratories. All alcohol testing shall be conducted on devices approved by the National Highway Traffic Safety Administration (NHTSA). All non-DOT collection and testing procedures shall mirror as closely as possible DOT 49 CFR Part 40 protocols.

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6.0 NON-COMPLIANCE

Any company personnel found in violation of this policy and/or customer's Policy or who refuse to cooperate with the searches and tests included in this policy and/or customer's Policy shall be permanently removed by company from customer Property and from performing work for customer. Company must immediately notify customers that the individual has become disqualified from performing work for them. Company will immediately review with customers the nature of the work previously performed by the individual. At customer's request company shall, at its sole cost and risk, inspect all work in which the individual may have participated and submit a written report to the customer that documents the inspection, any findings and the actions taken to assure all deficiencies have been corrected.

7.0 SUBSTANCE ABUSE AWARENESS

Company warrants that company Personnel performing work have each been fully informed of the requirements of this Addendum and company's Policy. Before beginning work on company and/or customer property, each company personnel must sign a written certification that he/she has been so informed and agrees to be bound by those requirements.

8.0 SPECIAL PROVISIONS - CUSTOMER-APPROVED CONSORTIUM

Enrollment in, and maintenance of "active status" in an Customer-approved consortium that requires pre-enrollment testing and continuously subjects active members to random drug and/or alcohol testing at an annual effective rate of at least 50% (unless otherwise specified by DOT) will be recognized as satisfying some customer's pre-access and random testing requirements. All costs associated with implementation and maintenance of this policy is the responsibility of company.

9.0 APPLICABLE LAWS

Company shall comply with all applicable federal, state, and local drug and alcohol related laws and regulations (e.g., DOT regulations, Department of Defense (DOD) Drug-Free Workplace Policy, Drug-Free Workplace Act of 1988, etc.).

10.0 SUPERVISOR TRAINING

Company shall provide training regarding this policy. Training on the recognition of performance indicators of probable drug and/or alcohol use and on its effects and consequences to personal health, safety and the workplace shall be included. It is required that each supervisor employee who will determine whether an employee must be tested based on reasonable suspicion, receive at least one 60-minute training session on the specific, contemporaneous, physical, behavioral and performance indicators of probable drug and alcohol use. Records of individuals trained (including name, date) must be maintained by the company and available to customers.

11.0 AUDIT

A. Company shall keep records required by this Addendum available for inspection by customers during the period that the company is performing work for customers and for a period of (3) years after company ceases to perform work for that customer.

B. Customers shall have the right, at its discretion, to perform unannounced audits of the company's alcohol and drug program to verify that company's policy and its enforcement comply with these guidelines.

C. At customer's request, company will provide separate lists of company Personnel (including name and last 4 digits of social security number) who were eligible for customers work on a date specified by customers. Upon further request, company will provide customers with the following information on each alcohol and drug test conducted for each company Personnel identified by customers from those lists:

- 1) Date of and type of test (e.g. random, pre-access) and
- 2) Laboratory chain-of-custody identification number and/or test number.

Company will obtain an agreement from any consortium, laboratory, and/or Medical Review Officer (MRO) providing drug/alcohol testing services for company that upon submission by customers of a list, or lists, of last 4 digits of social security numbers, chain-of-custody ID numbers and test dates,

- 1) The consortium/laboratory will verify that the tests were conducted as represented and
- 2) The consortium/laboratory and/or Contractor MRO will provide a sworn statement that each of the tests identified by the customer were confirmed as negative or that it/they cannot so swear.

ATTACHMENT A
NON-DOT DRUG AND ALCOHOL TESTING PROTOCOL

COLLECTION FACILITY	NAME	OCCUPATIONAL MEDICINE
	ADDRESS	144 VALHI LAGOON XING HOUMA, LOUISIANA 70360
	PHONE NUMBER	986-233-0024
	CONTACT PERSON	GRETCHEN MOORE

TESTING LABORATORY	NAME	QUEST DIAGNOSTICS
	ADDRESS	
	PHONE NUMBER	800-877-7484
	NATIONALLY CERTIFIED	YES
MRO (Medical Review Officer)	MRO NAME	ROBERT DAVIS, MD
	MRO PHONE	985-233-0024

SUBSTANCE	SCREEN LEVEL	CONFIRMATION LEVEL
COCAINE	300 NGIML	150 NGIML
PHENCYLCIDINE (PCP)	25 NGIML	25 NG.ML
MARIJUANA (THC)	50 NGIML	15 NGIML
OPIATES 6-Acetylmorphine	2000 NG!ML	2000 NG!ML
AMPHETAMINES SIMETHAMPHETAMINES MDMA1 MDA2 MDEA3	1000 NGIML	500 NGIML
BARBITURATES	300 NG/ML	200 NGIML
B ENZODIAZEP IN ES	300 NGIML	300 NGIML
METHADONE	300 NGIML	200 NGIML
PROPOXYPHENE	300 NGIML	200 NGIML
1Methylenedioxyethamphetamine (MDMA) 2Methylenedioxyamphetamine (MDA) 3Methylenedioxyethylamphetamine (MDEA)	SEE ABOVE	SEE ABOVE
ALCOHOL TESTING METHOD USED:	SCREEN LEVEL	CONFIRMATION LEVEL
BREATH OR SALIVA	.02%	.04%

I hereby acknowledge that I have been provided a copy of the addendum to Kent Materials, Inc. Drug/Alcohol policy requirements. I understand that disciplinary action, up to and including termination, will result if I violate this Policy.

Employee Signature

Date

Employee Printed Name

Social Security Number (last 4 digits)

Consent and authorization for disclosure to clients of Kent Materials, Inc. of alcohol and drug test results and related information

I hereby consent to disclosure by Kent Materials, Inc. and its agents, including, but not limited to, any collecting and testing agencies, of the test results identified above and any related information to clients of Kent Materials, Inc. and its authorized agents, assigns, or representatives.

Employee Signature

Date

Employee Printed Name

Social Security Number (last 4 digits)

Kent Materials, Inc.

ALCOHOL, DRUG AND CONTRABAND POLICY

EFFECTIVE DATE: 05/26/2011

Approved by: Karl Geist

For the purpose of this policy “company” shall refer to: Kent Materials, Inc.

Revised 10/1/2010

Kent Materials Inc. - SUBSTANCE ABUSE POLICY

1.0 PURPOSE

To insure a safe, healthy, and productive work environment for the employees of Kent Materials, Inc., *Customers* and others on company/customer Property, to protect company/customer Property and assets and to ensure efficient operations, company shall have and enforce a written policy on drugs and alcohol which complies with the laws of the states in which the company performs services for customers.

2.0 DEFINITIONS

A. *Company Personnel* - any company's employees, agents, subcontractors or subcontractors' employees performing field operations work on company and/or customer Property. This includes temporary and part-time personnel.

B. Kent Materials, Inc. and/or customers *Property* - All real or tangible personal equipment, either property, including facilities, buildings, vehicles, products and owned or controlled by Kent Materials, Inc. and/or Customers.

C. *Prohibited Substances* - (1) illicit or unprescribed mood or mind-altering substances (i.e. any produces a marijuana-type high and any herbal consumption), (2) prescribed drugs used in prescription and (3) alcoholic beverages.

D. *Reasonable Suspicion* - A belief based on objective and articulable facts sufficient to lead a supervisor to suspect use of Prohibited Substances.

E. *Under the Influence* - (1) the presence of a Prohibited Substance or metabolites of a Prohibited Substance in body fluids above the cut-off level established by Contractor's Policy or other commonly accepted cut-off level and/or (2) the presence of a Prohibited Substance that affects an individual in any detectable manner. The symptoms of influence may be, but are not limited to, slurred speech or difficulty in maintaining balance.

3.0 PROHIBITIONS

Unless specifically authorized in writing by company and/or customers, Kent Materials, Inc. Policy shall prohibit company Personnel from the following:

A. Using, possessing, selling, manufacturing, distributing, concealing or transporting on company and/or customer Property any of the following items:

- i. Any Prohibited Substance;
- ii. Contraband, including firearms, ammunition, explosives, and weapons;
- Hi. Illicit drug equipment or paraphernalia.

B. While on company and/or customer Property, possessing or using prescription drugs or over-the-counter medication that may cause impairment, except when all of the following conditions have been met:

- i. Prescription drugs have been prescribed by a licensed physician for the person in possession of the drugs.
- ii. The prescription is not expired and was filled by a licensed pharmacist for the person possessing the drugs
- iii. The individual notifies his/her supervisor that he/she will be in possession of, or using, impairment-causing prescription drugs or over-the-counter medication and appropriate steps are taken to accommodate the possibility of impairment, including but not limited to, removal from work for the period of possible impairment.

C. Being Under the Influence of Prohibited Substances while performing any work for company and/or customers.

D. Switching or adulterating any urine, blood or other sample used for testing.

E. Performing work for company and/or customers when an individual has tested positive or refused testing in any employment-related test.

4.0 SEARCHES AND INSPECTIONS

On company and/or customer property, at any time, company and/or customer supervisors, Contractor supervisors and/or authorized search and inspection specialists, including scent-trained animals, may conduct unannounced searches and inspections of company and/or company Personnel and their property. That property may include, but is not limited to, wallets, purses, lockers, baggage, offices, desks, toolboxes, clothing and vehicles.

5.0 TESTING

A. Requirements

i. Pre-Access Testing:

a. All company Personnel are subject to “customer” pre-access testing which might mandate that the employee(s) receive a negative result on a drug and/or alcohol test within 60 days or less preceding the company Personnel’s first access to customer Property (some clients will accept if employees are currently active in a DOT random testing pool). Annual drug and alcohol testing also required by specific customers. Upon customer’s request, company shall so certify in writing. A single letter certifying negative test results for all Contractor Personnel requiring site access is preferred.

b. Company will provide no information to customers identifying individuals who have positive pre-access tests.

ii. Post-Incident Testing:

a. If company and/or customers determine from the best information available immediately after a work-related Incident that performance of one or more company Personnel contributed to the Incident, or cannot be completely discounted as a contributing factor to the Incident, company shall remove that/those individual(s) from customer Property and surrender his/her site credentials to the customers. For purposes of this part “Incident” means an event that causes personal injury requiring medical treatment beyond first aid administered at the work site, or property damage of more than \$1,000 or an event that carried the potential for serious personal injury or significant property damage.

b. An individual so removed will be allowed to return to work on customer Property only after company conducts alcohol and drug testing on the individual as soon as possible following the individual’s removal from the site, and the Contractor certifies in writing the test identification number, the individual’s social security number (last 4 digits), the test date and time and a negative test result. On that written certification the company will include a consent signed by the individual permitting disclosure to customers of the test result.

iii. Reasonable Suspicion Testing:

a. Upon Reasonable Suspicion of company and/or customers that company Personnel is Under the Influence of a Prohibited Substance while on company and/or customer Property, company shall remove the individual(s) from customer Property and surrender his/her site credentials to the customers.

b. An individual removed from company and/or customer Property for Reasonable Suspicion will be allowed to return to work on company and/or customer Property only after company conducts alcohol and drug testing on the individual as soon as possible following the individual's removal from the site, and the company certifies in writing the test identification number the individual's social security number (last 4 digits), the test date and time and a negative test result. On that written certification the company will include a consent signed by the individual permitting disclosure to customers of the test result.

iv. Random Testing

If specific customers require random drug and/or alcohol testing then the following guidelines will be followed.

Unless otherwise specified by DOT, company employees shall be subject to unannounced random testing for the 5 DOT substances as well as barbiturates, benzodiazepines, methadone, and propoxyphene on a random basis that will yield a compliance of an annualized rate of at least 50% (unless set at a lower rate by a specific client) spread reasonably throughout the year. If required by the specific client, a breath alcohol test will be given at the same time as the drug test. Upon notification of a drug and/or alcohol test, company employee must report to the collection site within 60 minutes, plus travel time. Failure to report to the collection site, refusal to test, or adulterating a specimen is considered the same as a positive test and individual will not be allowed on company and/or customer premises.

v. Wall-to-Wall Testing

Company employees on certain customer premises are subject to unannounced en masse drug & alcohol testing. Such tests are scheduled at the sole discretion of specific customers. This includes the determination of the scope for such testing in addition to the timing of such testing. The scope of such testing will be determined by the customer in terms of a group of company employees to be tested. Such a group will include all members of the named group on site at the determined time or time period and shall not be determined in terms of named individuals. Such groups may include, but are not limited to, all company employees on site, or by shift, by crew, by location, by craft, by company or by another similar category, including a random selection based on site access records.

The Substance Abuse Policy requires the use of Department of Health and Human Services (DHF-IS) certified laboratories. All alcohol testing shall be conducted on devices approved by the National Highway Traffic Safety Administration (NHTSA). All non-DOT collection and testing procedures shall mirror as closely as possible DOT 49 CFR Part 40 protocols.

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6.0 NON-COMPLIANCE

Any company personnel found in violation of this policy and/or customer's Policy or who refuse to cooperate with the searches and tests included in this policy and/or customer's Policy shall be permanently removed by company from customer Property and from performing work for customer. Company must immediately notify customers that the individual has become disqualified from performing work for them. Company will immediately review with customers the nature of the work previously performed by the individual. At customer's request company shall, at its sole cost and risk, inspect all work in which the individual may have participated and submit a written report to the customer that documents the inspection, any findings and the actions taken to assure all deficiencies have been corrected.

7.0 SUBSTANCE ABUSE AWARENESS

Company warrants that company Personnel performing work have each been fully informed of the requirements of this Addendum and company's Policy. Before beginning work on company and/or customer property, each company personnel must sign a written certification that he/she has been so informed and agrees to be bound by those requirements.

8.0 SPECIAL PROVISIONS - CUSTOMER-APPROVED CONSORTIUM

Enrollment in, and maintenance of 'active status' in an Customer-approved consortium that requires pre-enrollment testing and continuously subjects active members to random drug and/or alcohol testing at an annual effective rate of at least 50% (unless otherwise specified by DOT) will be recognized as satisfying some customer's pre-access and random testing requirements. All costs associated with implementation and maintenance of this policy are the responsibility of company.

9.0 APPLICABLE LAWS

Company shall comply with all applicable federal, state, and local drug and alcohol related laws and regulations (e.g., DOT regulations, Department of Defense (DOD) Drug-Free Workplace Policy, Drug-Free Workplace Act of 1988, etc.).

10.0 SUPERVISOR TRAINING

Company shall provide training regarding this policy. Training on the recognition of performance indicators of probable drug and/or alcohol use and on its effects and consequences to personal health, safety and the workplace shall be included. It is required that each supervisor employee who will determine whether an employee must be tested based on reasonable suspicion, receive at least one 60-minute training session on the specific, contemporaneous, physical, behavioral and performance indicators of probable drug and alcohol use. Records of individuals trained (including name, date) must be maintained by the company and available to customers.

11.0 AUDIT

A. Company shall keep records required by this Addendum available for inspection by customers during the period that the company is performing work for customers and for a period of (3) years after company ceases to perform work for that customer.

B. Customers shall have the right, at its discretion, to perform unannounced audits of the company's alcohol and drug program to verify that company's policy and its enforcement comply with these guidelines.

C. At customer's request, company will provide separate lists of company Personnel (including name and last 4 digits of social security number) who were eligible for customers work on a date specified by customers. Upon further request, company will provide customers with the following information on each alcohol and drug test conducted for each company Personnel identified by customers from those lists:

- 1) date of and type of test (e.g. random, pre-access) and
- 2) laboratory chain-of-custody identification number and/or test number.

Company will obtain an agreement from any consortium, laboratory, and/or Medical Review Officer (MRO) providing drug/alcohol testing services for company that upon submission by customers of a list, or lists, of last 4 digits of social security numbers, chain-of-custody ID numbers and test dates,

- 1) the consortium/laboratory will verify that the tests were conducted as represented and
- 2) The consortium/laboratory and/or Contractor MRO will provide a sworn statement that each of the tests identified by the customer were confirmed as negative or that it/they cannot so swear.

ATTACHMENT A
NON-DOT DRUG AND ALCOHOL TESTING PROTOCOL

COLLECTION FACILITY	NAME	PRIME MEDICAL
	ADDRESS	3515 HWY 1 SOUTH PORT ALLEN, LA 70767
	PHONE NUMBER	225-749-5750
	CONTACT PERSON	

TESTING LABORATORY	NAME	QUEST DIAGNOSTICS
	ADDRESS	
	PHONE NUMBER	800-877-7484
	NATIONALLY CERTIFIED	YES
MRO (Medical Review Officer)	MRO NAME	ROBERT DAVIS, MD
	MRO PHONE	985-233-0024

SUBSTANCE	SCREEN LEVEL	CONFIRMATION LEVEL
COCAINE	300 NGIML	150 NGIML
PHENCYLCIDINE (PCP)	25 NGIML	25 NG.ML
MARIJUANA (THC)	50 NGIML	15 NGIML
OPIATES 6-Acetylmorphine	2000 NG!ML	2000 NG!ML
AMPHETAMINES SIMETHAMPHETAMINES MDMA1 MDA2 MDEA3	1000 NGIML	500 NGIML
BARBITURATES	300 NG/ML	200 NGIML
B ENZODIAZEP IN ES	300 NGIML	300 NGIML
METHADONE	300 NGIML	200 NGIML
PROPOXYPHENE	300 NGIML	200 NGIML
1Methylenedioxyethamphetamine (MDA) 2Methylenedioxyamphetamine (MDA) 3Methylenedioxyethylamphetamine (MDEA)	SEE ABOVE	SEE ABOVE
ALCOHOL TESTING METHOD USED:	SCREEN LEVEL	CONFIRMATION LEVEL
BREATH OR SALIVA	.02%	.04%

I hereby acknowledge that I have been provided a copy of the addendum to Kent Materials, Inc. Drug/Alcohol policy requirements. I understand that disciplinary action, up to and including termination, will result if I violate this Policy.

Employee Signature

Date

Employee Printed Name

Social Security Number (last 4 digits)

Consent and authorization for disclosure to clients of Kent Materials, inc. of alcohol and drug test results and related information

I hereby consent to disclosure by Kent Materials, Inc. and its agents, including, but not limited to, any collecting and testing agencies, of the test results identified above and any related information to clients of Kent Materials, Inc. and its authorized agents, assigns, or representatives.

Employee Signature

Date

Employee Printed Name

Social Security Number (last 4 digits)

BLOODBORNE PATHOGENS (EXPOSURE CONTROL PLAN)	Issue Date: 7-29-2010	Kent Materials
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Policy

It is the policy of Kent Materials (KM) to protect all employees from exposure to bloodborne pathogens (blood or other potentially infectious material) by ensuring they understand the occupational exposures, the methods of compliance, the Hepatitis B Vaccination process, the Post-Evaluation and Follow-Up process, and the exposure hazards and have access to a copy of this Exposure Control Plan.

Procedure

Employees that render First Aid/CPR and assist First Aiders (EMT/Paramedics) providing these services have the potential for exposure to blood from open wounds and contact with body fluids contaminated with blood and/or mouth contact while performing First Aid and CPR, or when providing additional medical care (to level trained). **All** employees also have the potential for exposure to blood or body fluids if handling contaminated materials such as clothing, bandages, equipment, and surfaces (floors, walls and appliances) resulting from a work-related incident. The most effective protection against exposure or potential exposure to blood or body fluids is ***exposure prevention*** (avoid any and all contact). Each employee must “prevent” exposure and the potential for exposure to himself/herself and others by remembering the following:

- All employees warn others of the consequences of exposure of human blood and body fluids when an incident occurs.
- Universal precautions shall be observed (and applied) to prevent contact with blood or other potentially infectious materials: **All human blood and body fluids are considered infectious for Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV), and other bloodborne pathogens.**
- Unprotected contact with blood and body fluids and other potentially infectious materials is not authorized.
- Only trained and certified employees administer First Aid/CPR (to level trained).
- All regulated waste is disposed of in appropriate containers and removed by or according to the procedures of an approved medical waste disposal company.

When new employees are first hired, the Operations Manager accomplishes the following before initial assignment:

1. Reviews *Bloodborne Pathogens Policy and Procedure* with employee (see *New Hire Orientation Policy and Procedure*).
2. Reviews and offers vaccinations to employee, then has employee sign and date *Hepatitis B Vaccination Consent/Declination Form* (see attached), then witnesses and dates Form and places it in employee medical files.
3. If employee chooses to take vaccinations (signs *Consent Statement*), initiates and assists three shot/six month process at designated clinic or hospital.

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4. Verifies following are known to employee (as applicable):
 - Proper barrier masks and latex gloves (in Infection Control Kit) and protective clothing are readily available.
 - Location of proper biohazard waste container, properly colored/labeled.
 - Location of decontamination material (10% bleach and water solution or chemical germicide), properly labeled.
 - Location of equipment/materials is known to First Aider(s).
 - Notification process with names and telephone numbers are up-to-date and properly displayed at most telephones.
5. Location where vaccinations are given at no cost to KM employees: Locations are at company medical clinics in near vicinity to where work is performed.
6. Identifies qualified and certified First Aid/CPR, EMT, Paramedic and Blood borne Pathogens-trained employees.

In the event of an ***injury***, this preparation proves invaluable. Personnel who have been properly trained, utilizing the proper (and available) PPE and containers, following the proper procedures, and knowing who to call to obtain the necessary assistance, are going to eliminate or minimize the potential for and consequences of the exposure. When an incident involving blood/body fluids occurs, the following is completed **within 24 hours after the incident**:

1. Injured/ill employee or co-worker contacts First Aid/CPR (EMT/Paramedic) and Blood borne Pathogens-trained personnel (First Aider).
2. First Aider administers First Aid/CPR using proper PPE, with or without assistance, careful to avoid exposure to blood and body fluids, observing Universal Precautions: **always treat situation as though victim has HIV, HBV or other blood borne pathogen!**
3. Employee or First Aider notifies Supervisor; when practicable, Supervisor notifies Operations Manager of incident (see *Incident Reporting and Investigating Policy and Procedure*).
4. Employee or First Aider communicates necessary information to Operations Manager to determine one of following: No Exposure, Potential Exposure or Exposure Incident.
5. Operations Manager makes preliminary exposure incident assessment by simply evaluating situation involving incident (with or without help of Company physician or First Aider and without regard to PPE).
6. If preliminary assessment is **No Exposure**, Operations Manager fills out Incident Report and documents "No Exposure" in *Comments* section of *Accident/Incident Report*, and no further action is required.

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7. If initial assessment is either *Potential Exposure* or actual *Exposure Incident*, Operations Manager fills out *Accident/Incident* Report, documents Potential Exposure or Exposure Incident in *Comments* section (when practicable), and completes assessment process:

- a. Explains Hepatitis B vaccination series as post-exposure preventative to injured/ill employee; if employee has previously received vaccinations, no further action is required.
- b. Sends employee to hospital, where physician makes final determination:
 - travels with employee to/meets employee at designated medical facility and provides information so physician can make final determination; assists employee in making decision.
 - if employee declines vaccinations, no further action is taken.
 - if employee consents to vaccinations, obtains vaccinations and appropriate paperwork at medical facility.
- c. Places appropriate paperwork in employee's medical file, to include:
 - Accident/Incident Report
 - Medical evaluation forms (if any generated)
 - Hepatitis B Vaccination record (if vaccinated)
- d. Arranges for medical counseling (if employee chooses).

8. At some point, First Aider and/or others (outside organization) clean up and/or disinfect exposed areas (careful to protect against exposure), and place materials containing blood/body fluids into bio-hazardous regulated container.

9. Once clean up and/or disinfecting is complete, Operations Manager contacts appropriate bio-hazard waste disposal organization to pick up and dispose of contaminated materials.

10. Operations Manager generates follow-up to Accident/Incident Report, describing all actions taken and information and documents generated as result of incident, and attaches to Accident/Incident Report.

11. Operations Manager ensures complete Accident/Incident Report is placed in appropriate HSE file.

Vaccines

Hepatitis B vaccinations (3) include an initial injection when the incident occurs, another injection 30 days after the incident, and a third injection six months after the incident. No vaccine is currently available for HIV or HCV; the only effective way to avoid infection is to avoid contact with the blood or body fluids of infected individuals. However, a safe and effective vaccine is available to prevent HBV. The vaccine currently being used is produced in yeast; it contains no human plasma, so there is no possibility it can be infectious for HBV. Approximately 90% of healthy adults who receive the vaccine develop protective antibodies against HBV infection.

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Epidemiology and Symptoms

Pathogens are disease-causing microorganisms. Blood borne pathogens are viruses or bacteria that are present in human blood and body fluids and can cause disease in humans. The most notable are HIV, HBV and HCV, but there are others.

HIV attacks a certain type of white blood cell (the T cell) which is a vital part of the body's immune system. HIV infects T cells and multiplies inside them, eventually destroying the host cells. As a result, the body is left without an important line of defense against infection. A person infected with HIV is susceptible to opportunistic diseases (such as pneumonia, cancer and other ailments) that would not seriously affect someone with a healthy immune system. HIV infection may mimic a variety of other medical illnesses.

HBV is the virus that causes Hepatitis B infection. It is spread by direct contact with the blood or bodily fluids of an infected person. Once HBV has been transmitted, the incubation period ranges from 45 to 180 days (averages 120 days). The onset of Hepatitis B occurs gradually and is discovered in the patient only after the illness has fully developed. Although many people will be asymptomatic (i.e., without symptoms), possible symptoms of Hepatitis B include weight loss, malaise, nausea, vomiting, abdominal pain, jaundice (yellow skin), skin rashes and aching joints.

HCV is the virus that causes Hepatitis C infection. It is spread by direct contact with the blood or body fluids of an infected person. Once transmitted, the incubation period is an average of 45 to 75 days. Most people infected with HCV are asymptomatic (do not show symptoms). In fact, only about 25% to 30% of infected individuals show any signs of infection, and those signs may not be recognized. Possible symptoms of Hepatitis C are similar to those of Hepatitis B.

Modes of Transmission

The two most common ways that people become infected by bloodborne pathogens are through sexual transmission and intravenous (IV) drug use. However, any contact with infected blood or body fluids carries the risk of potential infection. Blood borne pathogens can also be transmitted through materials that have become contaminated with blood or body fluids. Blood borne pathogens are not transmitted by casual contact, such as touching or sharing equipment or facilities. Although HIV tends to have higher visibility in the media, there is a greater risk of infection from HBV, since it is relatively easy to contract (exposure to 1 PPM). Drops of blood or body fluids too small to see can be transmitted into the body through the eyes, nose or mouth, or through undetected cuts in the skin.

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Protection

Avoid infection by ensuring you have a clear understanding of the hazards of bloodborne pathogens and the preventive measures to take to protect yourself from exposure. There are five main elements of protection against exposure to bloodborne pathogens:

- Universal Precautions
- Personal Protective Equipment (PPE)
- Housekeeping
- Engineering Controls
- Work Practice Controls

A critical element in protecting yourself from bloodborne pathogens is the use of ***Universal Precautions***: treating all blood and body fluids as if they are known to be infected with bloodborne pathogens. For example, if you come upon an incident scene, you should assume all fluids present are infectious, and avoid any unnecessary contact or inappropriate actions that could cause infection. Always protect yourself first, before providing help to the victim.

Personal protective equipment is provided to all employees at no cost and includes special clothing and equipment worn to prevent potentially infectious fluids from coming into contact with you and your clothes.

- Gloves are the first line of defense: single-use latex (or other similar material) gloves to protect the skin and hands; leather or other protective gloves should be worn over latex in situations where latex gloves could be punctured, cut or torn.
- Eye protection (safety glasses, goggles, face shield) prevents contaminants from entering the mucous membranes through the eyes (splashing).
- Masks prevent splashing fluids from entering the mucous membranes through the nose or mouth.
- Gowns or other protective clothing are worn if an emergency situation involves large quantities of fluids, which should be prevented from coming into contact with the skin or work clothes.
- CPR masks (with one-way valves that prevent fluids from entering the rescuers mouth and nose) are used in situations where CPR or mouth-to-mouth resuscitation is performed.

Housekeeping includes the following tasks:

- While wearing proper PPE (gloves, gown, mask, etc.), clean and decontaminate all infected surfaces: work surfaces, equipment, etc. Clean with acceptable absorbent materials and an appropriate disinfectant (10% solution of bleach-in- water or germicide).
- Dispose of blood and body fluids and materials used to clean properly, in closable, biohazard or red-colored regulated waste containers or plastic bags.

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The use of *engineering controls* helps reduce your exposure to bloodborne diseases by either removing the hazard or isolating you from exposure. Some examples include using self-sheathing needles, providing special containers for contaminated sharp instruments, and using disposable airway equipment and resuscitation bags.

Keep the workplace safe and healthy from bloodborne pathogens exposure through the use of *work practice controls*, which alter how tasks are performed in order to prevent infection. The following work practices help you avoid exposure:

- Always take Universal Precautions: treat all blood and body fluids as if they are infectious.
- When responding to an emergency, protect yourself before you help the victim, regardless of how well you know the individual.
- Always wear appropriate PPE. In most cases, gloves provide adequate protection, but eye protection, a mask and a gown are worn if it is possible you will be exposed to large quantities of blood or body fluids.
- When performing CPR, always wear a CPR mask equipped with a one-way valve to prevent contact with blood and body fluids.
- Remove all contaminated PPE immediately following an emergency response. When removing gloves and other equipment, turn each item inside-out to contain any contaminants.
- After removing PPE, vigorously scrub your hands and other exposed skin with warm water and antiseptic soap at available hand washing facilities; if water is not available, use a waterless disinfectant hand cleaner.
- Place used PPE in appropriately designated containers when it is being stored, washed, decontaminated or discarded.
- Wash any contaminated clothing thoroughly in an appropriate disinfectant solution. If your street clothes become contaminated, launder them separately in an appropriate disinfectant solution. If your employer provides a uniform for you, the employer must have it properly cleaned.
- Dispose of regulated waste in leak-proof, closable, biohazard or red-colored containers or plastic bags. Discard waste products according to federal, state and local guidelines.
- Handle all trash as if it contains sharp and/or infectious items.
- Contain all spills immediately, and then clean up and disinfect the area.
- If you must clean up contaminated broken glass, use tongs, forceps or a brush and dust pan. Never use your hands, even if you are wearing gloves.
- When working in areas where bloodborne pathogens may be present, you must never eat, smoke or perform any activities that involve placing your hands near your face. Germs can get on your hands, food and smoking materials and enter your mouth, nose or eyes.

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Training

Training is accomplished by reviewing the contents of this Policy and Procedure with all employees, before initial assignment and within one (1) year of previous training. Verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee complete and sign the *Hepatitis B Vaccination Consent/Declination Form* and successfully complete a written test (see *Performance- Based Training* section). Training is recorded on the *Training Report* to reflect the training received.

Recordkeeping

- Performance-Based Training Tests completed during the training session are attached to *Training Documentation* forms, placed in appropriate HSE files and maintained for three (3) years, then discarded.
 - Signed and dated *Hepatitis B Vaccination Consent/Declination Forms* are placed in affected employee's exposure and medical files and maintained for thirty (30) years, then discarded.
 - Medical records generated as a result of employee receiving medical attention and/or vaccinations are placed in affected employee's exposure and medical files and maintained for thirty (30) years, then discarded. Medical records are available to employees in accordance with 29 CFR 1910.1020(h) and include:
 - o Name and social security number of employee;
 - o Copy of employee's hepatitis B vaccination status including dates of all hepatitis B vaccinations and any medical records relative to employee's ability to receive vaccination;
 - o Copy of all results of examinations, medical testing, and follow-up procedures;
 - o Employer's copy of healthcare professional's written opinion; and
 - o Copy of information provided to healthcare professional.
- Standard: 29 CFR 191 0.1030 Blood borne pathogens

(a) Scope and Application. This section applies to all occupational exposure to blood or other potentially infectious materials as defined by paragraph (b) of this section. (b) Definitions. Occupational Exposure means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.

(c) Exposure control—(1) Exposure Control Plan. (i) Each employer having an employee(s) with occupational exposure as defined by paragraph (b) of this section shall establish a written Exposure Control Plan designed to eliminate or minimize employee exposure. (ii) The Exposure Control Plan shall contain at least the following elements: (A) The exposure determination required by paragraph(c)(2), (B) The schedule and method of implementation for paragraphs (d) Methods of Compliance, (e) ..., (f) Hepatitis B Vaccination and Post-Exposure Evaluation and Follow-up, (g) communication of Hazards to Employees, and (h) Recordkeeping, of this standard, and (C) The procedure for the evaluation of circumstances surrounding exposure incidents as required by paragraph (t)(3)(i) of this standard.

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Standards (continued)

(iii) *Each employer shall ensure that a copy of the Exposure Control Plan is accessible to employees in accordance with 29 CFR 1910.20(e).* (iv) *The Exposure Control Plan shall be reviewed and updated at least annually and whenever necessary to reflect new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.*

(2) *Exposure determination.* (0) *Each employer who has an employee(s) with occupational exposure as defined by paragraph (b) of this section shall prepare an exposure determination. This exposure determination shall contain the following: (A) A list of all job classifications in which all employees in those job classifications have occupational exposure; (B) A list of job classifications in which some employees have occupational exposure, and (C) A list of all tasks and procedures or groups of closely related task and procedures in which occupational exposure occurs and that are performed by employees in job classifications listed in accordance with the provisions of paragraph (c) (2) (i) (B) of this standard.* (ii) *This exposure determination shall be made without regard to the use of personal protective equipment.*

(2) *Information and Training.* (0) *Employers shall ensure that all employees with occupational exposure participate in a training program which must be provided at no cost to the employee and during working hours.* (ii) *Training shall be provided as follows: (A) At the time of initial assignment to tasks where occupational exposure may take place; (B) Within 90 days after the effective date of the standard; and (C) At least annually thereafter.*

(vii) *The training program shall contain at a minimum the following elements:* (A) *An accessible copy of the regulatory text of this standard and an explanation of its contents; (B) A general explanation of the epidemiology and symptoms of bloodborne diseases; (C) An explanation of the modes of transmission of bloodborne pathogens; (D) An explanation of the employer's exposure control plan and the means by which the employee can obtain a copy of the written plan; (E) An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials; (F) An explanation of the use and limitations of methods that will prevent or reduce exposure including appropriate engineering controls, work practices, and personal protective equipment; (G) Information on the types, proper use, location, removal, handling, decontamination and disposal of personal protective equipment (H) An explanation of the basis for selection of personal protective equipment (I) Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge; (J) Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials; (K) An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available; (L) Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident (M) An explanation of the signs and labels and/or color coding required by paragraph (g) (1); and (N) An opportunity for interactive questions and answers with the person conducting the training session.*

[Web address is www.ppoaccess.gov in Browse, scroll down to and click "Title 29 — Labor"; click "Go"; search and click 1910 (1910.1000-end); search and click 1910.1000 to 1910.1450; search and click "1910.1030 Blood borne

pathogens”.]

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**HEPATITIS B VACCINATION
CONSENT/DECLINATION**

The statement of consent or declination of Hepatitis B vaccination must be signed by an employee who either chooses to take the vaccine (consent) or chooses not to take the vaccine (declination). The statement can only be signed by the employee following appropriated training regarding Hepatitis B, Hepatitis B vaccination, the efficacy, safety, method of administration, and benefits of the vaccination, and an understanding that the vaccine and vaccination are provided free of charge to the employee. The statement is not a waiver if the declination is selected; the employee can request and receive the Hepatitis B vaccination at a later date if he/she remains at risk for Hepatitis B.

CONSENT STATEMENT

I understand that due to my occupational exposure to blood or other potentially infectious materials (bodily fluids), I may be at risk of acquiring the Hepatitis B virus (HBV) infection. I am given the opportunity to be vaccinated with the Hepatitis B vaccine, at no charge to myself. I consent to take the Hepatitis B vaccinations at this time.

Employee Name (Print)

Employee Signature

Date

Witness Name (Print)

Witness Signature

Date

DECLINATION STATEMENT

I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring the Hepatitis B virus (HBV) infection. I am given the opportunity to be vaccinated with the Hepatitis B vaccine, at no charge to myself. However, I decline to take the Hepatitis B vaccination at this time. I understand that by declining this vaccine I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can request and receive the vaccination series at no charge to myself.

Employee Name (Print)

Employee Signature

Date

Witness Name (Print)

Witness Signature

Date

FIRST AID/CARDIOPULMINORY RESUSCUTATION (CPR)	Issue Date: 7-29-2010	Kent Materials
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Policy

It is the policy of Kent Materials (KM) to provide First Aid and/or CPR immediately to all employees in the event an illness or injury occurs in the workplace.

Procedure

KM employees may not always be within three-to-four minutes (near proximity) of medical assistance. In the event of an illness or injury requiring First Aid and/or CPR, proper training from the American Red Cross (or equivalent provider) and quick thinking are essential for the well-being of the injured or ill employee. First Aid and/or CPR are administered in order to provide quick, initial medical care and attention to employees in the workplace, according to the following procedure:

1. Injured/ill employee or co-worker contacts First Aid/CPR-trained employee (First Aider); when practicable, employee or First Aider contacts Supervisor.
2. First Aider quickly assesses situation (to level trained) to determine extent of injury or illness, and care and attention required.
3. First Aider provides First Aid and/or CPR care and attention (to level trained), using supplies and proper PPE from kits, until injured or ill person is stable, assistance arrives, and/or injured or ill employee is brought to medical facility.

Note: First aid may include assistance flushing the victim's eyes with water.

4. If applicable, First Aider
 - a. calls 911 to get medical assistance (paramedic, ambulance) for injured or ill employee, or
 - b. if 911 not available, calls 411 to get information regarding location of nearest medical facility or ambulance service or refers to the conspicuously posted emergency response phone numbers, or
 - c. accompanies injured or ill employee to nearest medical assistance (doctor, clinic or hospital); employee accompanying injured or ill employee must be qualified (qualifications vary from administrative to First Aid/CPRtrained personnel; depends on severity of illness/injury).
5. If supplies and/or PPE are used from kit(s) when administering first aid or CPR, restocks kit(s) immediately.

First Aid and Infection Control (CPR) Kits

In the KM offices, a weather-proof First Aid Kit is located just outside the Operations Manager's office, in the shops, and in each vehicle so that they are easily accessible. A list of minimum supplies is found in each kit (*ANSI Z308.1—1998 Minimum Requirements for Workplace First-aid Kits*) and is based on the

hazards found in the workplace. A weather-proof CPR (Infection Control) Kit is located near or transported in

FIRST AID/CARDIOPULMINORY RESUSCUTATION (CPR)	Issue Date: 7-29-2010	Kent Materials
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each vehicle with each First Aid kit; a list of supplies (and PPE) is also found in this kit. The Operations Manager:

1. performs yearly audits to determine items needed in First Aid and Infection Control (CPR) kits based on workplace hazards (and based on ANSI standards).
2. verifies First Aid and/or CPR kits are in designated locations.
3. uses checklist (see attached) to inspect each First Aid and CPR kit weekly to determine which supplies and/or PPE have been used and/or which products have expired.
4. restocks First Aid and/or CPR kits immediately (or has vendor restock kits) if discrepancies found.

In the field, it is the responsibility of each employee to know the location of these kits in the client's workplace, and be prepared to assist the client representative to level trained if an accident occurs.

Eye Wash Stations

Eye Wash Stations (fountains or bottles) that provide at least 15 minutes of continuous drenching or flushing are found in the KM offices and facilities near the hazardous chemicals which require water drenching or flushing if there is eye or skin exposure. The employees in the field accomplish the following inspection to become familiar with the location and operation of the equipment, utilizing the attached inspection form:

Note: In our offices, water faucets in the restrooms and kitchen serve as "eye wash stations", since we have no hazardous chemicals.

1. If eyewash fountains,
 - a. inspects overall condition; if any part is damaged or corroded and could interfere with effective operation, replaces or repairs it immediately.
 - b. if "refillable" type, ensures container filled to proper level; if not filled, refills immediately.
 - c. operates to ensure water "fountain" is sufficient to reach eyes to provide flushing effect; ensures water does not spill onto walking surface where injured or others could slip and fall.
2. If eyewash bottles,
 - a. checks seals to ensure not broken (bottles have not been opened).
 - b. checks expiration dates.
 - c. replaces expired/opened solution with new, unopened bottles immediately.

3. Ensures proper signage identifying location of eye wash station is still in place and visible to employees working in area; if not, replaces signage immediately.

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4. Ensures stations are in proper locations and accessible; if not, places in proper location and/or removes all equipment or materials in aisles going to stations.

Prevention of eye or skin damage may rest on how quickly the injured gets to the eyewash station to begin the flush or drench. It is highly recommended that every employee working in an exposure area (where exposure to hazardous chemicals is possible) actually flush their eyes to get a feel for the water-flushing sensation ***before they actually need it.*** We all have a natural tendency to resist anything entering our eyes; you don't want to "resist" the preventive flushing affects of water when hazardous chemicals need to be removed or diluted.

Training

Training is accomplished by reviewing the contents of this Policy and Procedure with **all** employees when first hired and as necessary thereafter. verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee verify the location of the kits, verify the supplies and PPE listed on the inventory of each kit verify the condition of the eye wash station, and successfully pass a written test (see *Performance-Based Training* section). Training is recorded on the *Training Report* to reflect the training received.

One or more employees are trained and certified in First Aid/CPR by outside organizations (such as American Red Cross, Medic First Aid, etc.), according to that organization's training plan and frequency. In most instances, these outside organizations also provide bloodborne pathogens training and certification with their First Aid training (refer to *Blood borne Pathogens Policy and Procedure*). Verification of understanding of this training is the First Aid/CPR/ Blood borne Pathogens-trained employees' Certificates of Completion; copies of the Certificates of Completion are obtained and placed in the appropriate HSE files. The *Training Report* is updated to reflect the training received.

Recordkeeping

- *Checklists* and *Inspection Forms* completed during the training session are attached to *Training Documentation* forms, placed in appropriate HSE files and maintained for two (2) years, then discarded.
- Performance-Based Training written tests completed during the training session are attached to *Training Documentation* forms, placed in appropriate HSE files and maintained for two (2) years, then discarded.
- Copies of organizations' *Certificates of Completion* are placed in appropriate HSE files and maintained until employees are re-certified, then discarded.

Standard: 29 CFR 191 0.151 Medical services and first aid

“(a) The employer shall ensure the ready availability of medical personnel for advice and consultation on matters of plant health. (b) In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees

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Person, or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available, (c) Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use”

Appendix A to § 1910.1 51—First aid kits (Non-Mandatory) First aid supplies are required to be readily available under paragraph §1910.151(b). An example of the minimal contents of a generic first aid kit is described in American National Standard (ANSI) Z308. 1—1998 “Minimum Requirements for Workplace First-aid Kits.” The contents of the kit listed in the ANSI standard should be adequate for small worksites. When larger operations or multiple operations are being conducted at the same location, employers should determine the need for additional first aid kits at the worksite, additional types of first aid equipment and supplies, and additional quantities and types of supplies and equipment in the first aid kits. In a similar fashion, employers who have unique or changing first-aid needs in their workplace may need to enhance their first-aid kits. The employer can use the OSHA 200 log, OSHA 101’s or other reports to identify these unique problems. Consultation from the local fire/rescue department, appropriate medical professional, or local emergency room may be helpful to employers in these circumstances. By assessing the specific needs of their workplace, employers can ensure that reasonably anticipated supplies are available. Employers should assess the specific needs of their worksite periodically and augment the first aid kit appropriately. If it is reasonably anticipated that employees will be exposed to blood or other potentially infectious materials while using first aid supplies, employers are required to provide appropriate personal protective equipment (PPE) in compliance with the provisions of the Occupational Exposure to Blood borne Pathogens standard, §1910.1030(d) (3) (56 FR 64175). This standard lists appropriate PPE for this type of exposure, such as gloves, gowns, face shields, masks, and eye protection.

[Web address is www.gpoaccess.cioviectfr in Browse, scroll down to and click “Title 29 –Labor”; click “Go”; search and click 1900-1910 (1901.1-1910.999); search and click 1910 to 1910.901-1910.999; search and click “1910.151 Medical services and first aid”.]

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Inspection Item	Yes	No	NA
Band Aids (size not specified)			
Sterile Pads (size not specified)			
Triangular Bandage (size not specified)			
Blood_Stopper_Dressing_(type_not_specified)			
Burn Cream (type not specified)			
Alcohol_Wipes_(size_not_specified)			
Tape_(preferably waterproof;_size_not_specified)			
Gloves (type not specified)			
Infection Control Kit			
(Blood borne Pathogen; no standard)			
Inspection Item Yes No NA			
Personal Protection Package:			
• Gloves			
• Gown			
• Eye and Face Shield			
• Antiseptic/Wipes/Towelettes			
• Biohazard_Bag			
Spill Clean-Up Package: .			
• Absorbent Powder ..			
• Disinfectant Spray (Germicide or Bleach Solution) ..			
• Scoop and Spatula			
• Paper Towels			
• Biohazard Bag			
• Unmarked Bag			
• Gloves			
• Antiseptic Wipes/Towelettes			
CPR Micro-Shield			

**First Aid Kit
ANSI Z308.1**

Inspection Item	Yes	No	NA
Band Aids (size not specified)			
Sterile Pads (size not specified)			
Triangular Bandage (size not specified)			
Blood Stopper Dressing (type not specified)			
Burn Cream (type not specified)			
Alcohol Wipes (size not specified)			
Tape (preferably waterproof; size not specified)			
Gloves (type not specified)			

**Infection Control Kit
(Blood borne Pathogen; no standard)**

Inspection Item	Yes	No	NA
Personal Protection Package:			
• Gloves			
• Gown			
• Eye and Face Shield			
• Antiseptic Wipes/Towelettes			
• Biohazard Bag			
Spill Clean-Up Package:			
• Absorbent Powder			
• Disinfectant Spray (Germicide or Bleach Solution)			
• Scoop and Spatula			
• Paper Towels			
• Biohazard Bag			
• Unmarked Bag			
• Gloves			
• Antiseptic Wipes/Towelettes			
CPR Micro-Shield			

**Eye Wash Station
(ANSI Z358.1-2004)**

Inspection Item	Yes	No	NA
Is eyewash fountain in overall good condition.			
If refillable type, is container filled to proper level.			
Does fountain operate properly: reaches eyes and does not spill onto walking surfaces.			
Are eyewash bottles properly sealed.			
Is eyewash solution expired.			
Is eyewash solution replaced if found expired or seal broken.			
Is proper signage in place identifying location of station and is signage visible to employees working in area.			

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Are station(s) in proper location(s) and accessible to employees.				

Purpose

The purpose of the Hazard Communication Policy and Procedure is to enable Kent Materials to take the necessary steps to reduce exposures and establish proper work practices to help prevent the occurrence of work-related illness and injuries related to hazardous chemicals, and to provide a safer and healthier workplace for all personnel.

Policy:

It is the policy of Kent Materials to ensure that employees and owner-operators know the hazards and identities of the chemicals they are exposed to or could be exposed to when working.

Procedure:

The procedures that follow describe the processes for effectively implementing the written Hazard Communication program at Kent Materials. The HSE Manager implements and manages the particular aspects of the written Hazard Communication program through these five procedures.

Label and MSDS Verification

Hazardous chemicals are received at the shop and yard in different locations. The shop supervisor completes the following when hazardous chemicals are received from a vendor or purchased from a retailer.

1. Verify MSDS is attached to container or included with delivery, or obtain MSDS from retailer.
2. If MSDS is not with chemical or available from retailer, contact vendor or manufacturer immediately by telephone and request MSDS via fax or email, or print from Internet.
3. Verify label on container has identity of hazardous chemical, appropriate hazard warning, and name and address of vendor, distributor or manufacturer.
4. If label does not have required information, or if damaged, obtain new label from vendor via pickup/delivery and place on container, or obtain new container from retailer; use other markings and warnings while waiting for replacement label.
5. Determine if hazardous chemical is new to workplace (not on list) by comparing chemical names to inventory list; if chemical is new to workplace, record new hazardous chemical on inventory list and notify HSE Manager to schedule training session.
6. Remove old MSDS from binder and place new MSDS into binder.

Note: Telephone numbers are obtained from supervisor or the office. MSDS Internet site is www.ChemFinder.com.

Managing Chemicals and MSDSs

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Every quarter, and more frequently if appropriate, the MSDSs and inventory list you have in the MSDS binder must be reconciled by the HSE Manager with the actual hazardous chemicals you use and store in the workplace, to ensure that the Program is effectively accomplishing its intended purpose (an accurate inventory list and complete MSDS binder).

1. Make copy of inventory list of hazardous chemicals from MSDS binder.
2. Using copy, compare hazardous chemical names on inventory list to exact names on chemical containers being used or stored in workplace, and document findings.
3. While you are comparing names, check every container for following:
 - a. labels are still legible, visible and contain proper hazard warnings.
 - b. containers are properly stored, with proper containment.
 - c. empty containers are properly labeled, stored and ready to transport.
 - d. containers (and surroundings) do not have noticeable leaks, spills or odors.
 - e. containers not labeled are in sole use by personnel who transferred chemical.
4. Verify proper PPE is in good condition and being used when chemicals are handled.
5. Verify other equipment is in good working condition and being used properly.
6. Verify employees are handling hazardous chemicals safely in workplace.

Note: Notify Supervisors of any equipment or **handling discrepancies**.

7. If there are any discrepancies when comparing names,
 - a. notify Supervisor and, with his/her knowledge,
 - b. update inventory list to match what is being used and stored in workplace,
 - c. place updated list in MSDS binder, and
 - d. place outdated copy of List in *30-Year File*.
8. Then match this list of hazardous chemical names to exact names of hazardous chemical on MSDSs in MSDS binder, and document findings.
9. If there are any discrepancies,
 - a. notify Supervisor and, with his/her knowledge,
 - b. write exact name of chemical onto first page of MSDS (if necessary), and/or
 - c. place proper MSDS(s) in or remove MSDS(s) from MSDS binder.

Note: If MSDS is missing, obtain via fax, email or print from Internet; replace immediately.
Exposures

When exposures occur, the health and safety of people may be at risk. Time may be critical in identifying the chemical, determining what action to take, choosing what First Aid to administer, etc., and then acting appropriately. The procedure that follows is for all employees and owner operators that work for KM.

1. Assess overall situation: dangers, exposures, alarms, lights, people, area, etc.; if necessary, consider evacuation according to Emergency Evacuation Plan.

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ermine exact name of hazardous chemical(s) involved.

3. Locate hazardous chemical(s) in MSDS binder; field personnel contact dispatcher or Supervisor for information in MSDS.

4. Review applicable sections based on situation; field personnel are given information from dispatcher or Supervisor.

5. Determine course of action: First Aid, medical care, etc.

6. Take action; after incident is over, complete Incident Report and/or conduct investigation.

It is helpful to discuss some likely scenarios during safety meetings based on the more plentiful hazardous chemicals you have, and to practice the process of completing the steps in the Procedure above. This prepares everyone to better perform the steps if an actual exposure or release/spill occurs.

Note: This procedure does not address what are considered “HAZWOPER” spills and releases, only small releases or spills associated with personal exposures (health or physical).

Information and Annual Training

HSE Manager reviews the following informational statements at least annually at a safety meeting or as part of the annual training to remind employees and owner-operators that certain information is available to them and their representatives regarding the Hazard Communication Standard.

- Copies of the written Hazard Communication program and the Standard (29 CFR 1910.1200) are kept in the KM office and are available to all employees and their representatives upon request. [The Standard’s web address is www.osha.gov search “1910.1200; click “1910.1200 Hazard communications”.]
- The Hazard Communication Standard is reviewed with all employees and owner- operators annually.

MSDS information is available for review at any time for the Department in which each employee and owner-operator works; employees and owner-operators working in different Departments or in different workplaces have access to review MSDS information in those locations at any time.

Annual Training is accomplished to ensure compliance with the Hazard Communication Standard and to ensure that employees and owner-operators are afforded the right to know about the hazards of the chemicals found in their workplaces. The HSE Manager:

1. Schedules training session or sessions to conduct annual training.
2. Makes sure all people required to be trained are present and participate in the process; if necessary, use the Training Matrix to generate or verify the list of names.
3. Selects training items based on annual training requirements (identified below) and conducts training using the contents of this Policy and Procedure:

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Verification: HSE Manager describes process used to verify that labels are proper and acceptable on containers of hazardous chemicals received, what constitutes a proper and acceptable label, and any problems with poor label conditions on containers found in the workplace.

b. MSDS Verification: HSE Manager describes process used to verify MSDSs are with hazardous chemicals received, and any problems with incomplete and inaccurate MSDS (missing information, damaged pages, etc.).

c. Inventory Lists/Hazardous Chemical/MSDS Reconciliation: HSE Manager describes process used to reconcile that list with the hazardous chemicals used in

b. the workplace and with MSDSs in the binder.

d. Exposures: HSE Manager reviews the procedure for anyone exposed to a hazardous chemical.

e. Detection, Hazard and Protection Review: HSE Manager reviews all of MSDS Tables (at end of this Procedure), and discusses any issues with the employees and owner-operators; employees and owner-operators must be familiar with this information by the time they complete the training session.

4. Document the training on the appropriate Training form and submit it to the office. The annual training takes approximately two (2) hours to complete, and does not have to be conducted in a single session. Arrangements are made through the office to train employees and owner-operators unable to participate in the training session(s) in all or part of the training identified here. The HSE Manager may administer a test, which each employee and owner-operator must successfully pass, to verify understanding of the training information and material.

New Situation Training

The HSE Manager provides all new hires and any transferred personnel with information and training on the hazardous chemicals to which they may be exposed in the workplace.

1. Schedule training session as soon as possible after start of work with affected employees and owner-operators.
2. Review contents of KM written Hazard Communication program with participants:
 - a. location of written Hazard Communication program and MSDSs.
 - b. labeling process used by KM.
 - c. hazardous chemicals used in the mechanics shop/yard.
 - d. physical and health hazards of each chemical.

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- ng physical and health hazards.
- f. measures to protect people against exposure.
- 3. Ask questions of participants to ensure understanding of KM Program.
- 4. Document training on Training form and submit to the main office. This procedure is also used to conduct re-training and refresher-training sessions if Management determines training is necessary due to an incident, unsafe behavior, etc.

Chemical Inventory List

Mechanic Shop, Yard and Warehouse Date: 07/08/03

Chemical Name	Manufacturer	Used By
Aero-Flow Motor Oil	Baton Rouge Industries	Mechanics
AK-47 Grease Buster	Reliant Technologies	Mechanics, Welder
Hi-Tech Antifreeze	Baton Rouge Industries	Mechanics
Hot Stuff	Balmar	Mechanics, Welder
Neutra CIa CW	Univar USA	Mechanics
Power Gear MP Gear Lube	Baton Rouge Industries	Mechanics
R-Pack 97 Packer Fluid Corrosion	Reliant Technologies	Mechanics
Super S ND	Smitty's Supply	Mechanics
Super S AW 68 Hydraulic Oil	Smitty's Supply	Mechanics
Super S R&O Hydraulic Oil	Smitty's Supply	Mechanics
Super S SuperSyn 80W-140 Full Synthetic Gear Oil	Smitty's Supply	Mechanics
Super S Tractor Hydraulic / Transmission Oil	Smitty's Supply	Mechanics
TGR Extra Heavy Duty Cleaner	Reliant Technologies	Mechanics, Welder

TABLE

Date: 07/09/03

Hazardous Chemical	Detect Presence/Release	Physical/Health Hazards	Protection Measures
Aero-Flow Motor Oil	Clear, red color liquid Odor: Mild petroleum	Flammable, Explosive (punctured containers) Irritant, Aspirant, Toxic	Respirator, Gloves, Goggles or Face shield, Apron, Clothing. Provide ventilation. Avoid heat, ignition sources, strong oxidants. Store in closed containers away from heat, ignition sources, strong oxidants.
AK-47 Grease Buster	Red Liquid Odor: Pleasant	Flammable, Corrosive Irritant, Burns, Toxic	Respirator, Gloves, Goggles, Face Shield, Boots, Apron. Provide ventilation. Avoid acids or strong oxidizers. Store in dry area, avoid freezing.
Hi-Tech Antifreeze	Green, slightly viscous liquid Odor: Mild	Flammable, Explosive Irritant, Toxic	Respirator, Cloves, Clothing, Goggles. Provide ventilation. Avoid ignition sources and high temperatures. Store in cool, dry place w/adequate ventilation, away from ignition sources and high temperatures.
Hot Stuff	Purple liquid Odor: Mild	Irritant, Aspirant, Toxic	Respirator, Safety Glasses, Gloves, Clothing, Boots. Provide ventilation. Avoid extreme temperatures, strong oxidizers. Store away from extreme temperatures, strong oxidizers.

Neutra C1a CW	Light amber liquid Odor: Alcohol like	Flammable, Explosive (vapor) Irritant, Toxic	Respirator, Clothing, Gloves, Goggles, Lab Coat. Provide ventilation. Avoid ignition sources, heat, oxidizers. Store container tightly closed in cool well-ventilated area; avoid ignition sources and heat, ground equipment containing material.
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Hazardous Chemical	Detect Presence/Release	Physical/Health Hazards	Protection Measures
Power Gear MP Gear Lube	Clear, dark red liquid Odor: Mild, bland petroleum	Flammable, Explosive (vapors, punctured containers) Irritant, Toxic, Aspirant	Respirator, Gloves, Goggles or Face Shield, Apron, Clothing. Provide ventilation. Avoid heat, ignition sources, strong oxidants. Store in closed containers, away from heat, ignition sources, strong oxidants.
R-Pack 97 Packer Fluid Corrosion	Dark amber liquid Odor: Pungent	Irritant, Toxic	Respirator, Goggles, Gloves, Boots, Apron. Provide ventilation. Avoid ignition sources, excessive heat. Store in closed containers.
Super S ND	Clear liquid Odor: Slight hydrocarbon	Flammable Irritant, Aspirant	Goggles, Gloves, Face Shield, Respirator. Provide ventilation. Avoid ignition sources, strong oxidizers. Store in containers tightly closed in dry cool place, away from ignition sources, strong oxidizers; ground and bond all transfer and storage equipment and equipment w/self closing valves, pressure vacuum bungs and flame arrestors
Super SAW 68 Hydraulic Oil	Amber liquid Odor: Petroleum	Flammable, Explosive (punctured containers) Irritant, Toxic, Aspirant	Respirator, Goggles or Face Shield, Gloves, Apron. Provide ventilation. Avoid strong oxidizers. Store in closed, labeled containers away from ignition sources, strong oxidizer.

Super S R&O Hydraulic Oil	Clear light yellow liquid Odor: Mild petroleum	Flammable, Explosive (punctured containers) Irritant, Toxic, Aspirant	Respirator, Goggles or Face Shield, Clothing. Provide ventilation. Avoid ignition sources, oxidizers. Store in closed, labeled containers away from ignition sources, strong oxidizer.
Super S SuperSyn SOW-140 Full Synthetic Gear Oil	Dark liquid Odor: Pungent	Flammable Irritant	Goggles or Safety Glasses, Gloves, Clothes. Provide ventilation. Avoid ignition sources, strong oxidizers. Store in cool, dry place w/adequate ventilation, away from ignition sources and high temperatures.

Hazardous Chemical	Detect Presence/Release	Physical/Health Hazards	Protection Measures
Super S Tractor Hydraulic / Transmission Oil	Amber liquid Odor: Petroleum	Flammable, Explosive (punctured containers) Irritant, Toxic, Aspirant	Respirator, Goggles or Face Shield, Gloves, Apron. Provide ventilation. Avoid strong oxidizers. Store in closed, labeled containers away from ignition sources, strong oxidizer.
TGR Extra Heavy Duty Cleaner	Purple liquid Odor: Pleasant	Irritant	Respirator, Goggles, Gloves, Apron, Boots. Provide ventilation. Avoid strong oxidizers. Store in closed container in dry area, kept from freezing.

The Kent Materials (KM) written Hearing Conservation program is designed to protect personnel against the potential adverse effects of work-related noise associated with hearing loss, and to advise personnel about the contribution of non-occupational noises to potential hearing loss. The Occupational Noise Exposure standard (29 CFR 1910.95) is designed to provide employees with the information they need. [The web address for a current copy of the standard is www.osha.gov search “1910.95”; click “1910.95 Occupational noise exposure”.]

Knowledge acquired under the Hearing Conservation standard helps employers provide safer workplaces for their employees. When employers have information about the noise being generated in the workplace, they can take steps to reduce or control the exposures, engineer out the noises, and/or establish proper work practices. These efforts help prevent the occurrence of work-related hearing losses caused by excessive noise.

Written Program

Kent Materials (KM) administers a continuing, effective hearing conservation program whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response), or equivalent available in the standard, and for exposures to impulsive or impact noises exceeding 140 decibels peak sound pressure levels. For purposes of the hearing conservation program, employee noise exposures are

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uted in accordance with Appendix A and Table G-16a, without regard to any attenuation provided by the use of personal protective equipment.

Monitoring

KM monitors its noise levels annually according to Appendix G, in its yards, and shops. KM currently does not have any exposures that exceed the 8-hour time-weighted average of 85 decibels; however, KM does maintain a noise monitoring program that consists of the following:

- Noise monitoring is done using a sound level meter: A-weighting, slow response settings.
- Noise monitoring is conducted in at least four locations around the noise generators at a minimum of two different distances at two different elevations.
- Data is compiled and analyzed regarding the noise information collected.
- Information is collected and documented regarding the personnel working in these areas during the course of a routine work day.
- Information resulting from noise monitoring is posted annually for employees to view.
- All information is filed in accordance with the requirements of the Hearing Conservation Program.
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The information is reviewed annually to determine if the need for a Hearing Conservation Program still exists.

The equipment that generates these noises includes compressors, air ratchets, and other power tools and equipment. Non-occupational exposures include noise from yelling into someone's ear, personal power tools and equipment, engines and machines, musical instruments, and other noise generators around the home. All continuous, intermittent and impulsive sound levels from 80 decibels to 130 decibels are integrated into these noise measurements. The instruments used to measure employee noise exposures are calibrated annually to ensure measurement accuracy. Monitoring is repeated whenever a change in

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pment, or controls increases or decreases the noise exposures to the extent that additional employees may be exposed at or above the action levels or the attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements of this section. In addition, the information collected during the monitoring process is used in the proper selection of hearing protectors.

Employee Notification

KM notifies each employee exposed at or above an 8-hour time-weighted average of 85 decibels of the results of the monitoring, and provides the affected employees or their representatives with an opportunity to observe any noise measurements conducted in accordance with this program. The notification is made annually to all employees during the training of the hearing conservation program.

Audiometric Testing Program and Test Requirements

The noise survey conducted in August, 2003 at the KM offices, shops and yards in Port Allen and Baton Rouge indicated that there are no noise exposures to employees in excess of an 8-hour time weighted average (TWA) of 85 decibels or more based on the job descriptions and work activities performed. Therefore, an "Audiometric Testing Program" is not required at this time. If the noise levels change (increase), the noise survey will determine if there is a need for an "Audiometric Testing Program".

Hearing Protectors

KM provides hearing protectors to all employees at the shop and yard locations, at no cost to the employees. Managers and supervisors are responsible to ensure that hearing protectors are worn by their employees at all times when working in noise areas. Employees are responsible to ensure they wear the protectors. KM provides training in the use and care of all hearing protectors provided to employees, including their initial fitting and the correct use of the protector.

Hearing Protection Attenuation

KM evaluates the noise surveys conducted annually and the hearing protector attenuation for the specific noise exposure environments in which a protector is used, and uses the evaluation method described in 1910.95 Appendix B (iii) for determining attenuation; hearing protectors purchased by KM attenuate employee exposure at least to an 8-hour TWA of 85 decibels.

Attenuation is re-evaluated whenever noise increases to the extent that the hearing protectors provided may no longer provide adequate attenuation; when this occurs, KM will provide more effective hearing protectors.

Training Program

KM has established a training program for all employees who are exposed to some noise, and

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ation of its employees in the program. Training is conducted annually for each employee included in the hearing conservation program. Information contained in the training program is updated to be consistent with changes in the protective equipment and the work processes of the employees. KM informs each employee and owner-operators on the effects of noise on hearing; the purpose of hearing protectors; the advantages, disadvantages, and attenuation of various types of hearing protectors; and instructions on the selection, fitting, use and care of hearing protectors.

Access to Information and Training Materials

KM provides copies of this written Hearing Conservation program and copies of the Standard to affected employees and owner-operators and their representatives upon request. KM provides copies of any informational materials it receives pertaining to the Standard from the Assistant Secretary to affected employees and their representatives upon request. KM provides copies of all materials related to the KM training and education programs pertaining to this Standard to the Assistant Secretary and the Director upon request.

Recordkeeping

KM maintains an accurate record for two years of all employee exposure measurements regarding the “monitoring” of noise in the workplace. KM allows access to these records according to its *Access to Employee Exposure and Medical Records Program* (29 CFR 1910.1020), which is in compliance with the Standard.

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Policy

It is the policy of Kent Materials to ensure our employees fulfill the requirements and follow the guidelines of the client's H₂S program and assist the client in the implementation of its H₂S program.

Procedure

It is the responsibility of each Kent Materials employee to become familiar with the client's H₂S program and procedures as they pertain to the work assignment and working environment:

- Discuss with client representative the details of their H₂S Program.
- Complete required training/familiarization with Program.
- Discuss with client representative any specific roles and responsibilities he expects of Kent Materials employees while in workplace.
- Discuss with client representative methods of detecting H₂S through the use of monitors that alarm at appropriate permissible exposure limits of <20 PPM and safe evacuation when monitor alarm sounds.

When Kent Materials employees first arrive in an H₂S environment, the client is required to conduct training of their H₂S Program, including the use of respirators (escape SCBA). A drill may be conducted during the course of your work to determine if personnel understand and can comply with the client's H₂S Program and contingency/emergency plans; your participation is expected.

Characteristics of H₂S

Hydrogen Sulfide has a variety of characteristics; a working knowledge of them can ensure confidence, proper planning and safety while working around H₂S. The following are those characteristics:

- **Toxic:** deadly to humans and animals; one of the leading causes of sudden death in the workplace; no one can develop a resistance to H₂S.
- **Colorless:** no visible color; given the name “silent killer”.
- **Offensive odor:** at low concentrations, described as “rotten-egg smell”; sometimes described as a sweet, sickening odor; at higher concentrations, odor seems to disappear, giving a false sense of security.
- **Soluble:** in water and hydrocarbons; will be absorbed by most liquids.
- **Corrosive:** to certain metals; valves and piping suffer extreme damage from H₂S.
- **Heavier than air:** 20% heavier; can be disbursed great distances with only a slight breeze; collects in low-lying places (pits, ditches, cellars, other poorly ventilated areas).
- **Flammable:** when mixed with air; 500°F will produce ignition (burning cigarettes, heat from engine manifolds, electrical arcs, welding rods, etc.).

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- **Produces toxic by-products:** when ignited, produces Sulfur Dioxide (SO₂); extremely hazardous when inhaled and may leave victims disabled with pneumonia and respiratory damage; stay away from flare stacks and burning pits when H₂S is flared or ignited.
- **Presence:** may be found around the substructure, cellar, wellhead, in tanks, at the mud shaker, mud mixing house, flare stack and burn pits, etc.

Effects on Individuals

The greatest danger from H₂S is through inhalation; however, contact with the eyes and skin can also produce painful irritations. When H₂S is inhaled, it travels directly through the lungs and into the bloodstream. In an effort to protect itself, the body breaks down or oxidizes the H₂S as quickly as possible into a harmless compound. In excess quantities, the body cannot oxidize it all. H₂S affects the nerve centers of the brain which control breathing, causing paralysis: the lungs stop working and the person suffocates. The effect H₂S will have on an individual depends on the following factors:

- **Duration:** length of time individual is exposed.
- **Frequency:** how often individual is exposed.
- **Intensity:** how much exposure (concentration) individual receives.
- **Sensitivity:** how sensitive individual is to H₂S.

Special health problems increase the effect of H₂S in individuals; some of these are listed below:

- Punctured ear drum (may allow H₂S into respiratory tract).
- Emphysema.

- Asthma.
- Diabetes.
- Epilepsy.
- Eye infections.
- Anemia.
- Alcohol or consumption of alcohol within past 24 hours.

The following symptoms are experienced by most individuals exposed to H₂S:

Inhalation

- Inability or difficulty in breathing
- Coughing
- Dizziness
- Dryness in nose and throat
- Fatigue
- Headache
- Irrational behavior
- Loss of appetite
- Loss of consciousness

- Nausea

Contact with Eyes

- Pain or burning sensation in eyes
- Blurred vision
- Painful secretion of tears

Contact with skin

- skin discoloration
- skin irritation

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PPM*	0-2Min's	: 2-ISMin's	1530MihsZ	30-60 Mins	1-41-1km,	4-aHrs.	84&Hrs.
20-100	No effects	No effects	No effects	Mild conjunctivitis, respiratory tract irritation	Symptoms worsen, fatigue, headache	Symptoms worsen	Symptoms worsen
100-150	No effects	coughing, irritation or pain in eyes, sleepiness, loss of sense of smell	Disturbed respiration	Throat irritation	Salivation and mucous discharge, sharp pain in eyes, coughing	Increased symptoms	DEATH
150-200	No effects	Loss of sense of smell	Throat and eye irritation	Throat and eye irritation	Blurred vision, light shy	DEATH	DEATH
200-350	Irritation of eyes, loss of smell	Irritation of eyes	Painful secretion of tears, weariness	Light shy, nasal catarrh, pain in eyes, difficult breathing	Suffocation, poison in blood, DEATH	DEATH	DEATH
350-450	Loss of sense of smell	Irritation of eyes, dizziness	Difficult respiration, coughing, irritation of eyes, nausea	DEATH	DEATH	DEATH	DEATH

450-700	Respiratory disturbance, irritation of eyes, collapse, unconscious- ness	coughing, collapse, unconscious- ness	Palpitation of heart, DEATH	DEATH	DEATH	DEATH	DEATH
Over 700	collapse, Unconscious- ness, DEATH	DEATH	DEATH	DEATH	DEATH	DEATH	DEATH

Concentration Levels

To further understand the dangers involved in being exposed to H₂S, here are the concentration levels and the physical effects if exposed to those concentrations:

** PPM (parts per million) = Concentration Levels (per million parts of air)

Training

Training is accomplished by reviewing the contents of this Policy and Procedure with **affected** employees prior to beginning work in an H₂S environment and annually thereafter. Verification of understanding of the information contained in this Policy and Procedure is accomplished by having each employee successfully pass a written test (see *Performance- Based Training* section). Training is recorded on a *Training Documentation* form (see *Training Plan*); the *Training Report* is updated to reflect the training received.

Kent Materials employees may be trained and certified in H₂s by the client or an outside organization. Verification of understanding of this training is Certificate of Completion; copies of the Certificates of Completion are obtained and placed in the appropriate 1-ISE files. The *Training Report* is updated to reflect the training received.

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Recordkeeping

- *Training Documentation* forms are placed in appropriate HSE files and maintained for two (2) years, then discarded.
- Performance-Based Training written tests completed during the training session are attached to *Training Documentation* forms, placed in appropriate HSE files and maintained for two (2) years, then discarded.
- Copies of organizations' *Certificates of Completion* are placed in appropriate HSE files and maintained until employees are re-certified, then discarded.

Standard: 30 CFR 250.490 Hydrogen Sulfide

Link to an amendment published at 71 FR 19645, April 17,2006.

(a) *What precautions must I take when operating in an H₂S area?* You must: (1) Take all necessary and feasible precautions and measures to protect personnel from the toxic effects of H₂S and to mitigate damage to property and the environment caused by H₂S. You must follow the requirements of this section when conducting drilling, well-completion/well-workover, and production operations in zones with H₂S present and when conducting operations in zones where the presence of H₂S is unknown. You do not need to follow these requirements when operating in zones where the absence of 1-125 has been confirmed; and (2) Follow your approved contingency plan.

(f) *Requirements for submitting an H₂S Contingency Plan.* Before you begin operations, you must submit an H₂S

Contingency Plan to the District Supervisor for approval. Do not begin operations before the District Supervisor approves your plan. You must keep a copy of the approved plan in the field, and you must follow the plan at all times. Your plan must include: (1) Safety procedures and rules that you will follow concerning equipment, drills, and smoking; (2) Training you provide for employees, contractors, and visitors; (3) Job position and title of the person responsible for the overall safety of personnel; (4) Other key positions, how these positions fit into your organization, and what the functions, duties, and responsibilities of those job positions are; (5) Actions that you will take when the concentration of H₂S in the atmosphere reaches 20 PPM, who will be responsible for those actions, and a description of the audible and visual alarms to be activated; (6) Briefing areas where personnel will assemble during an H₂S alert. You must have at least two briefing areas on each facility and use the briefing area that is upwind of the H₂S source at any given time; (7) Criteria you will use to decide when to evacuate the facility and procedures you will use to safely evacuate all personnel from the facility by vessel, capsule, or lifeboat. If you use helicopters during H₂S alerts, describe the types of H₂S emergencies during which you consider the risk of helicopter activity to be acceptable and the precautions you will take during the flights; (8) Procedures you will use to safely position all vessels attendant to the facility. Indicate where you will locate the vessels with respect to wind direction. Include the distance from the facility and what procedures you will use to safely relocate the vessels in an emergency; (9) How you will provide protective-breathing equipment for all personnel, including contractors and visitors; (10) The agencies and facilities you will notify in case of a release of H₂S (that constitutes an emergency), how you will notify them, and their telephone numbers. Include all facilities that might be exposed to atmospheric concentrations of 20 PPM or more of H₂S; (11) The medical personnel and facilities you will use if needed, their addresses, and telephone numbers; (12) H₂S detector locations in production facilities producing gas containing 20 PPM or more of H₂S. Include an "H₂S Detector Location Drawing" showing: (i) All vessels, flare outlets, wellheads, and other equipment handling production containing H₂S; (N) Approximate maximum concentration of H₂S in the gas stream; and (iii) Location of all H₂S sensors included in your contingency plan; (13) Operational conditions when you expect to flare gas containing 1-125 including the estimated maximum gas flow rate, H₂S concentration, and duration of flaring;

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Standard (continued)

(14) Your assessment of the risks to personnel during flaring and what precautionary measures you will take; (15) Primary and alternate methods to ignite the flare and procedures for sustaining ignition and monitoring the status of the flare (Le., ignited or extinguished); (16) Procedures to shut off the gas to the flare in the event the flare is extinguished; (17) Portable or fixed sulfur dioxide (SO₂)- detection system(s) you will use to determine SO₂ concentration and exposure hazard when H₂S is burned; (18) Increased monitoring and warning procedures you will take when the SO₂ concentration in the atmosphere reaches 2 PPM; (19) Personnel protection measures or evacuation procedures you will initiate when the SO₂ concentration in the atmosphere reaches 5 PPM; (20) Engineering controls to protect personnel from SO₂ and (21) Any special equipment, procedures, or precautions you will use if you conduct any combination of drilling, well-completion, well-work over, and production operations simultaneously.

(g) **Training program**—(1) *When and how often do employees need to be trained?* All operators

and contract personnel must complete an H2S training program to meet the requirements of this section: (i) Before beginning work at the facility; and (H) Each year, within 1 year after completion of the previous class. (2) ***What training documentation do I need?*** For each individual working on the platform, either: (i) You must have documentation of this training at the facility where the individual is employed; or (ii) The employee must carry a training completion card.

[Web address is www.gpoaccess.gov/ecfr in *Browse*, scroll down to and click “Title 30 – Minerals Management Service”; click “GO”; search and click (200-299); search and click 250.1 01 to 250.1754; search (scroll down) and click “250.490 Hydrogen Sulfide”]

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INJURY AND ILLNESS RECORDKEEPING (OSHA 300's)	Issue Date:	Kent Materials
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Policy

It is the policy of Kent Materials that we maintain appropriate and regulatory compliant recordkeeping of injuries and illnesses.

Procedure

Written documentation of OSHA recordables (work related injuries and illnesses that meet the regulatory criteria, and fatalities) are maintained. The Operations Manager or their designee ensures annually:

1. Completes an individual OSHA 301 Incident Report for each injury or illness that is deemed Recordable by the criteria stated in the Standard.
2. Transfers information derived from completed OSHA 301 Incident Report onto the OSHA 300 Log, thus providing a compiling of information at one point of reference.

NOTE: All recordable illnesses or injuries are recorded on the OSHA 300 Log, within seven (7) days of receiving information that the injury or illness occurred.

3. In following with the Regulation, ensures that select information from the OSHA 300 Log is transferred onto the OSHA 300A Summary at the end of the calendar year.

4. Has a company official (preferably the President) certify by their signature that he has examined the OSHA 300 Log and that he reasonably believes, based on his knowledge of the process by which the information was recorded, that the annual summary is correct and complete.

5. Posts the OSHA 300A Summary in an area of the workplace that is frequented by and is visible to employees, no later than February 1st though April of that following year.

The OSHA 300 Log, the 301 Incident Report and the 300A Summary are kept on file for a period of at least five (5) years following the end of the calendar year that the most recent records cover.

Standard: 29 CFR 1904 Recording and Reporting Occupational Injuries and Illness

1904.0 Purpose

The purpose of this rule (Part 1904) is to require employers to record and report work-related fatalities, injuries and illnesses.

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RESPIRTORY PROTECTION	Issue Date:	Kent Materials
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Purpose

The Respiratory Protection Policy and Procedure provides Kent Materials (KM) with a means to ensure that respiratory protection is provided, correctly used, and properly maintained in the workplace.

Policy

It is the policy of KM that all employees and owner-operators exposed to health hazards in the workplace wear respiratory protection.

Procedure

Respiratory devices are provided, used and maintained in a sanitary and reliable condition to ensure that employees and owner-operators are protected from the affects of hazards through inhalation. The HSE Manager conducts an assessment of work activities in the yard and shop to determine what inhalant hazards are present, or are likely to be present, which necessitate the use of respiratory devices. KM provides filtering face pieces (dust mask) or half mask respirators for respiratory protection. Routine

activities in which inhalant hazards are present are listed below; non-routine activities in which inhalant hazards are likely to be present are assessed at the time of the activity by the HSE Manager.

- Painting operations – fumes, vapors and mist; precautions are taken to keep fumes, vapors or mists from entering air passages by wearing a respirator with an organic vapor cartridge.
- Service/repairs – dust and dirt that is present when working under the trucks and trailers; precautions are taken to keep dust from entering air passages by wearing a filtering face piece (dust mask).
- Lubricating equipment – fumes, vapors and mist; precautions are taken to keep fumes, vapors or mist from entering air passages by wearing a respirator with an organic vapor cartridge.
- Spill response – fumes, vapors and mist; precautions are taken to keep fumes, vapors or mist from entering air passages by wearing a respirator with an organic vapor cartridge.

Respirator and Cartridge Selection

Chemical cartridge respirators protect against gases, organic vapors and pesticides; mechanical filters protect against dusts, mists, fumes, smoke and aerosols, and particulate masks filter air-borne dust particles. The HSE Manager identifies inhalant hazards in the workplace and selects the specific respiratory devices that best provide the desired protection. Respirator selection and cartridge selection is completed by the HSE Manager by:

1. Reviewing current MSDS for chemical, paint, solvent, etc., to determine the type of respiratory device required, and
2. selecting a filtering face piece (dust mask) that is the most effective for particulate filtering and reading the label and application recommendations on the package for the dust inhalant hazard, or

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3. selecting a respirator with cartridge that is the most effective and reading the label and application recommendations on the cartridge package (such as organic vapor cartridge, acid gas cartridge, or combination cartridge) for the fume, vapor, or mist inhalant hazard.

Filtering Facepiece (Dust Mask)

After the HSE Manager determines which respirators are the most effective for the workplace hazards, the HSE Manager or his designee makes the respirators available for use by the employees at the shop and yard and owner-operators in the field. The employee or owner-operator:

1. Selects a filtering face piece.
2. Dons the filtering face piece using a mirror to evaluate the fit and positioning of the mask:

- a. Ensures fit across chin is comfortable.
 - b. Positions band.
 - c. Ensures fit over bridge of nose is comfortable.
 - d. Ensures filtering face piece will not slip off face.
3. Visually examines the filtering face piece for foreign material; if present, discards and replaces the filtering face piece.
4. Visually examines the filtering face piece after each use for damage; if damaged or in poor condition, discards and replaces the filtering face piece.

Respirators

Respirators are fit tested prior to use. The fit test is not conducted if there is any facial hair between the skin and the face piece sealing surface. Any type of apparel that interferes with a satisfactory fit is altered or removed. The employee to be fit tested accomplishes the following:

1. Selects a respirator size and shape most likely to provide the best fit.
 - a. Holds respirator up to face without positioning and tightening straps.
 - b. Repeats process until respirator feels comfortable on face: position on nose, room for eye protection, room to talk, and position on face and cheeks.
2. Dons the respirator using a mirror to evaluate the fit and positioning of the mask:
 - a. Ensures fit under chin is comfortable.
 - b. Positions and tightens straps; set with adequate tension, not overly tight.
 - c. Ensures fit over bridge of nose is comfortable.
 - d. Ensures respirator is properly sized to span between chin and nose.
 - e. Ensures respirator will not slip off face.

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3. Conducts a user seal check, either negative or positive pressure:
 - a. Places non-porous paper in cartridge holder to make face piece air-tight.
 - b. Seats the mask by moving it up and down and side to side while taking slow deep breaths.
 - c. If seal is broken (air gets in), selects another face piece and repeats the process.
4. Performs the following one minute test exercises while in a normal standing position and without adjusting the face piece during the tests; removes paper and installs cartridges:
 - a. Breathes normally without talking.
 - b. Breathes deep and slow, taking care to prevent hyperventilation.
 - c. Turns head slowly from side to side and inhales when head is at each extreme.
 - d. Moves head up and down and inhales in the extreme up position.
 - e. Talks slowly but loudly enough to be heard (read, count, etc.).
 - f. Smiles or frowns (once per second, 15 seconds only).
 - g. Bends over at the waist as if to touch the toes.
 - h. Breathes normally without talking.

- i. Answers questions with acceptable results regarding fit; if not acceptable, repeat using another face piece.
5. Visually examines respirator for foreign material; if present, washes with soap and water, rinses thoroughly, allows to dry, then disinfects with a mild antiseptic spray.
6. Visually examines cartridge after each use for breathing impairment, visible saturation of particulates, etc.; if impaired breathing or saturated with particulates, discard cartridge.

If the user exhibits difficulty in breathing during the tests or use, the user is evaluated medically to determine if he/she can wear a respirator while performing the required duties.

Training

Training is based on the duties and functions to be performed by each employee and owner-operator, and completed prior to the required use of a respirator. Some KM employees are not involved with activities where respirators are required. Employees and owner-operators that use respirators are trained in the following:

- Limitations and capabilities of respirators used at location.
- Recognition of malfunctioning respirators and how to handle situation.
- Recognition of medical signs and symptoms that limit or prevent the effective use of respirators.

The HSE Manager verifies that applicable employees and owner-operators have an understanding of the training and have the ability to use the PPE properly. Re-training is provided if there are changes that render previous training obsolete, or if an employee has not retained the requisite understanding or skill. Training is documented and filed in the appropriate file at the Port Allen office.

Hazard Control

Job Safety and Environmental Analysis

Safety Meetings

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Purpose

The Job Safety Environmental Analysis (JSEA) Policy and Procedure provides our employees and owner-operators with a means to eliminate, reduce or minimize incidents by implementing and monitoring the JSEA procedure with a focus on employee and owner-operator behaviors while working in the shop and in the field.

Policy

It is the policy of Kent Materials (KM) to eliminate, reduce or minimize all physical and behavioral hazards associated with work *before* the work begins, and control those hazards that cannot be eliminated while the work is being performed.

Procedure

This procedure applies to all mechanic shop jobs and activities that include “critical tasks”.

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s have corresponding JSEAs that are reviewed prior to the start of each critical job/activity. Respective Manager/Supervisor accomplishes the following:

1. Determines the jobs/activities to be performed during the upcoming shift.
2. If the jobs/activities include critical tasks, locates the appropriate JSEA(s); if a prepared JSEA is not available, prepares a JSA to cover the critical task that day.
 - a. fills in the header information (supervisor's name, date, time, job to be conducted/performed).
 - b. places a check mark in all of the blanks for all of the categories that apply to the job tasks about to be conducted/performed.
 - c. lists the "Sequence of Basic Job Steps".
 - d. lists members of the crew.
 - e. once the crew members meet to discuss the JSEA, complete the rest of the "PreJob Preparation" section and verify that the appropriate items are checked.
3. Schedules a meeting of the work crew (mechanics) involved in the critical tasks.
4. Uses the JSEA as follows:
 - a. Reads the.th basic job step (*in the Sequence of Basic Job Steps*) and associated potential hazards listed on the JSEA Worksheet.
 - b. Discusses the hazards, and determines preventive measures to eliminate, reduce or minimize the hazards for that job step prior to the start of work.
 - c. Records the hazards and preventive measures on the JSEA Worksheet.
 - d. Identifies and writes onto the JSEA Worksheet each person responsible for ensuring that that hazards are eliminated, reduced or controlled, through the preventive measures, before the work starts or while performing the critical task.
 - e. Discusses the required PPE associated with the hazards that must be worn to protect while performing the critical task.
 - f. Reads the remaining basic job steps and hazards on the JSEA and repeat steps b. through e.
 - g. Has all members of the work crew sign the JSEA Worksheet next to their names.

NOTE: Indicate only one basic job step per line. List each of the potential hazards associated with each of the basic job steps on their own line. List each preventive measure that corresponds with the respective hazard, on its own line (just lateral of its respective hazard).
5. When the JSEA review process is complete, signs the JSEA and maintains and refers to the JSEA during the entire shift when critical tasks are being performed.
6. Ensures that work crew obtains and dons proper PPE for critical tasks and other jobs/activities; if PPE is missing, obtains necessary equipment for employees.

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r to start of critical tasks, directs responsible work crew members to eliminate, reduce or minimize their respective hazards by taking the preventive measures listed on the JSEA Worksheet.

8. Job task begins; work crew members control their respective hazards, especially regarding the following:

- Communicating among co-workers during jobs/activities.
- Monitoring of behaviors of co-workers.
- Coaching co-workers regarding proper behaviors.
- Stopping work if behaviors or conditions become too dangerous.

NOTE: If the job shuts down for an appreciable amount of time (i.e. one-hour plus) and starts up again and/or if crew members are added or replaced, another brief safety meeting is held to review/verify safety and assign added crew members / remaining crew members duties in respect to the JSEA process.

9. At the end of the work, ensures that the job (site) is cleaned up; completes the “Cleanup” section of the JSEA.

10. Closes out the job by indicating time, then initials on the JSEA Worksheet, removing all tags and signing the JSEA Worksheet;

11. Returns the JSEA to the Port Allen office or location of dispatch.

JSEAs to pick up hazardous materials at a customer location and deliver it to a permitted disposal facility are generated using the steps mentioned above and approved by KM management for use in the field. When employee drivers and owner-operators are asked by a customer to complete JSEA, the driver can either produce the generic JSEA or complete one using the steps mentioned above.

If the changes to any JSEAs are considered significant and of value to the other drivers, the driver forwards a copy of the marked up JSEA to the HSE Manager, who in turn presents the changes to management for review and approval.

The HSE Manager checks the implementation and effectiveness of the JSEA during his visits to ensure that the JSEAs are being implemented properly: pre-job meetings, checks JSEAs during critical tasks, observes affected employees taking responsibility for their particular hazards, and performs other checks relating to the JSEA procedure.

Job Safety Environmental Analysis (JSEA) Worksheet

The Proactive Approach to Injury Prevention

Consider the following and check the items that apply to the job task and then review with the work crew.

Special Attention

_____ Hot Work
_____ Confined Space Entry
_____ Posted at Jobsite

Other _____

Personal Protective Equipment

Normal PPE

- Hard Hat
- Safety Glasses
- Cotton Gloves
- Steel-Toed Boots

Rubber Gloves

Leather Gloves

_____ Combustibles
_____ Spark Containment
_____ Welding Screens (Personal
Protection)

_____ Grounding

_____ Water Hose

_____ Fire Extinguisher

_____ Fire Blanket Other _____

_____ Firewatch

_____ Other _____

Electrical

_____ Locked and Tagged

_____ Inadequate Lighting

_____ Valves Blocked

_____ Line or Equipment Cleared

_____ Noise

_____ Poor Access/Egress

_____ Poor Housekeeping

_____ Sharp Objects

Access

_____ Ladder

_____ Other _____

Emergency Info/Equipment Location

_____ Fire Extinguishers

Add'l Foot Protection

Slicker Suit

Rubber Boots

Face Shield

Mono Goggles

Hearing Protection (Ear Plugs)

Fall Protection

Seat Belts

Burning Goggles

Welding Shield

Other _____

Tools

Current Inspection

Proper Tools for the Job

Good Tool Conditions

Qualification required

Other _____

Try Start/Stop Switch GFCI Test

Assured Grounding

Extension Cord Inspection

Other _____

Lifting

Forklift

Load Chart

Angle

Chain fall

Proper Rigging Practices

Manual Lifting

Condition of Equipment

Other _____

Hazards (Chemicals)

Chemical Burns – skin/Eyes

Flammable

Ingestion

Inhalation

skin Contamination

Other _____

Hazards (Body)

Fall Potential

Pinch Points

Slip-Trip Potential

Other _____

Hazards (Environmental)

Airborne, Particulates

Electrical Shock

Heat Stress

Heavy Objects

Hot, Cold Surfaces or Materials

Evacuation Route

Wind Direction Noted

Other _____

Other/Miscellaneous

Barricades

Signs

Other Crews Working in Area

Other _____

Additional comments:

*Make sure employees have read and understand the requirements of the permit.

Supervisor Signature:

Welding

Welding Leads in Good Condition and Inspected

Who is Responsible Write the name of the person responsible to implement the control measure identified								
Actions and Risk Control Measures List the actions and control measures required to eliminate or minimize the risk of injury								

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142</
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[illegible]

Job Safety Environmental Analysis

[illegible]

JSA Team:	Individual Name/company Name	Signature	Mobile Phone#
Area Authority (AA) Confirms all work activates comply with associated safe practices. Signatures required only if AA is on the worksite and participates in JSEA tasks			
Issuing Authority (IA) Issues permits consistent with safe practices, signature required only if a permit has been issued.			
Performing Authority (PA) Responsible for conducting or supervising all work identified and agreed in the scope and accountable for the safe execution of the activity			
Others: essential personnel who are performing or supervising tasks or activities.			Name of the site visitors not involved in the work activities.
Helicopter Services Life Flight		Describe muster point:	Worksite Gps Coordinates (Lat/Long) or driving directions for Emergency Rescue: Post Job Review: Start/stop/Continue BEST – Practice/Activity(s) Observed; AREA FOR IMPROVEMENT Practice/activity(s) Observed:
Emergency Contacts			
Sheriff			
Ambulance			
Fire Department			
Police			
Hospital			
Civil Defense			
Highway Patrol			

Kent Materials	Policies and Procedures	Issue 8-8-03
	SAFETY MEETINGS	Rev. date 4/19/2011

i

Purpose

The Safety Meeting Policy and Procedure provides Kent Materials (KM) with a means to ensure that our employees attend and participate in safety meetings.

Policy

It is the policy of Kent Materials that all employees and owner-operators attend and participate in all Safety Meetings.

Procedure

Safety Meetings are conducted and cover general health, safety and environmental topics and issues, and current and specific health, safety and environmental activities that are relative to Kent Material's operations. Productive safety meetings help improve processes, behaviors and conditions, and inform and educate employees and owner-operators. The HSE Manager:

1. Plans and organizes each safety meeting by discussing operations and activities with KM's management and staff, selecting a topic of interest that pertains to KM, or presenting items KM's management wants presented.
2. Schedules the safety meeting date and time.
3. Gathers all of the information, materials, equipment, etc. and prepares all of the handouts that will be used during the safety meeting.
4. Completes the sections of the Safety Meeting form (see attached) prior to the meeting: header section and Description of Topic.
5. Obtains names and signatures on the bottom of the Safety Meeting form.
6. Completes the rest of the sections of the form based on what occurred during the safety meeting.
7. Files the Safety Meeting form in the appropriate HSE file.

HSE Manager provides semi-annual reports to KM management identifying the scope of the Safety Meetings during the previous six months, with recommendations for the content of the meetings for the next six months.

In addition to the Safety Meetings, information regarding health, safety and environmental topics and issues are communicated through Safety Alerts (see attached). This serves to make employees and owner-operators aware of issues and items that cannot wait until the schedule safety meeting.

Kent Materials	Policies and Procedures	Issue 8-8-03
	SAFETY MEETINGS	Rev. date 4/19/2011

SAFETY ALERTS

HSE TOPIC:
BRIEF ACCOUNT OF THE INCIDENT:
OUTCOME:
CAUSES:
LESSONS LEARNED:
ACTIONS TO PREVENT
COMMENTS:

Kent Materials	Policies and Procedures	Issue 8-2003
	TRAINING PLAN	Rev. date 4/28/2011

Purpose

The purpose of the Training Policy and Procedure is to identify the training requirements of all Kent Materials employees and owner-operators, provide a process to ensure that they are properly trained, and ensure the training is documented and reported according to the requirements.

Policy

It is the Policy of Kent Materials (KM) that employees and owner-operators are properly trained according to the standards and best practices available.

Procedures

The training procedure begins by carefully evaluating the duties and activities of each job position within KM to determine what training is required, and how often, and ends by evaluating employees and owner-operators to ensure that they are healthy and safe, and they know how to protect themselves, the public, the environment, and their equipment. Employees and owner-operators are trained throughout the year in the various plans, programs, permits, policies and procedures which make up the KM Health, Safety and Environmental Management System. The HSE Manager has the responsibility of managing the training procedure according to these requirements by conducting the training, by using outside training organizations, or by using in-house trainers or instructors. The HSE Manager completes the following to plan, organize and develop the training process:

1. Evaluates KM employee and owner-operator positions to determine what training applies, and the frequency of re-training in relation to activities performed by employees and owner-operators in particular job positions.
2. Generates a list of required training for the health, safety and environmental plans, permits, programs, policies and procedures that pertain to activities within these job positions (see Attachment #1, *Required Training*); the shaded items are required training for all employees and owner-operators, regardless of their job positions.
3. Determines how employees and owner-operators are trained (Training Method: Review Procedure, Outsource or both) and by whom (Trainer/Instructor: HSE Manager or Designee; Outside Training Organizations) (see Attachment #1, *Required Training*).
4. Compares job positions to required training in order to generate a Training Matrix which identifies training for specific positions (see Attachment #2, *Training Matrix*).
5. Submits the Training Matrix to Management for review and comment; edits the Matrix to reflect the comments received.

Kent Materials	Policies and Procedures	Issue 11-5-03 Rev. date
	TRAINING	

The evaluation process and preparation of the Training Matrix is repeated annually or whenever changes in job positions significantly affect the required training.

HSE Manager and Designee Responsibilities

Training completed by the HSE Manager (or his designee) is conducted at the office in Port Allen or at the Erwinville Community Center, when the facilities are available; training may also be conducted by the outside training organization at their training facility location. Regardless, the HSE Manager (or his designee) or organization conducts the training by completing the following:

1. Determines elements to be trained during a particular time period (month/quarter); selects one element to train.
2. Coordinates with KM Management to schedule employees and owner-operators for specific training date and time.
3. Notifies affected employees and owner-operators of the date and time of the training.
4. Completes that Training Documentation form relating to the training session being conducted (see Attachment #3, *Training Documentation*).
5. Reviews the Policy and Procedure to become very familiar with its content, especially the section on Training.
6. Locates, obtains and prepares any training materials needed to conduct the training and review the procedure with the employees and owner-operators, including copies of the Policy and Procedure.
7. Plans and organizes the training session to be conducted.
8. Distributes copies of the Policy and Procedure to the employees when they arrive for the training.
9. Conducts the training and/or administers the tests, including a review of the steps in the Policy and Procedure.
10. Presents Training Documentation form to employees to sign at the end of the training session; collects form when they have signed.
11. Restores/returns any training and/or testing materials needed to conduct the training.
12. Reviews Training Documentation form and/or tests administered during the training sessions to verify training is complete.
13. Provides the completed and signed Training Documentation form and/or tests to the Safety Coordinator to file in the Port Allen office.

Kent Materials	Policies and Procedures	Issue 11-5-03
	TRAINING	Rev. date

14. If necessary, follows-up with se employees that registered but did not attend, to reschedule training missed for the next available training session or assigns training to be provided by their respective Supervisor.

15. If a Certificate and/or wallet card is required, ensures that the certificate and/or card are generated and submitted to the Safety Coordinator for proper handling and distribution.

16. Prints and distributes the Training Report (hard copy, electronic copy) to identify status of employee training to Managers and Supervisors during the reporting period (see Attachment #4, *Training Report*).

HSE Manager repeats the process again and again until all of the required training is completed. If training is conducted by an outside training organization, HSE Manager provides the trainer/instructor with the appropriate information and documentation to enable the outside organization to conduct the training and, when the training is complete, collects the appropriate information and documentation from the outside training organization trainer/instructor to complete the paperwork for KM.

Observations/Inspections are conducted in the field and in the workplace, and testing is done periodically to determine if the training is effective, and is making an impact on the safety and health of KM employees and owner-operators, and the KM environment. If it is not, and if incidents are occurring, employees and owner-operators may be re-trained on the material or information before the published frequency.

The Training Report is audited quarterly to ensure that all employees obtain the required training; Managers and Supervisors are notified of the audit and of the results, including reasons why employees did not accomplish the training in a timely manner.

TRAINING REQUIRED TRAINING

Required Training	Standard/best Practice	Frequency	Training method	Trainer/Instructor
Access to Medical Records	29CFR 1910.1020	Initially, annually	Review Procedure	HSE Manager/Supervisors
Accident Prevention signs/tags	29CFR 1910.145	Once, other not specified	Review Procedure	HSE Manager/Supervisors
Blood borne Pathogens	29 CFR 1910.1030	Initially; annually; changes	Pure Safety	HSE Manager/Supervisors
Confined Space (permit-Required)	29 CFR 1910.146(G)	Initially; changes	Pure Safety	HSE Manager/Supervisors
Contraband	Best Practice	Once, other not specified	Review Procedure	HSE Manager/Supervisors
Contractor Management	Best Practice	Once; other not specified	Review Procedure	HSE Manager/Supervisors
Defensive Driving large Vehicles	Best Practice	Once; other not specified	Outsource, Pure Safety	Outside instructors
DOT Driver compliance	DOT Regulation	Initially; annually	Pure Safety	
DOT HM 126f / non-hazardous	49 CFR 172.704 HM 126	Initially; annually	Pure Safety	HSE Manager/Supervisors
Dot HM 232 Security plan	49 CFR 172.704 HM 232	Initially; every three years	Review Procedure	HSE Manager/Supervisors
Disciplinary policy	Best Practices	Initially; as needed	Review Procedure	HSE Manager/Supervisors
Drug and Alcohol	49 CFR 40, 382, 653	Once; other not specified	Review Procedure	HSE Manager/Supervisors
Egress and emergency Action Plans	EAP Requirements	Initially; as needed	Pure Safety	
Emergency Evacuation/fire Prevention	29 CFR 1910 .38(a)	Once; other not specified	Pure Safety	HSE Manager/Supervisors
Fall Protection	29 CFR 1910.66 1926. 503	Initially; prior to each use	Pure Safety	HSE Manager/Supervisors
Flammable and consumable Liquids	DOT Regulation	Initially; as needed	Pure Safety	
Fire Safety/Fire Extinguisher	29 CFR 1910.157 (G)	Initially; as needed	Pure Safety	HSE Manager/Supervisors
First Aid/CPR	29 CFR 1910.151(b)	Initially; as needed	Pure Safety	Outside Instructor
Industrial Powered Trucks	29 CFR 1910.178(l)	Initially; as needed	Pure Safety	HSE Manager/Supervisors
Hand Wrist and finger Safety	Best Practice	Initially; as needed	Pure Safety	
Hazard Communication	29 CFR 1910.1200(h)	Initially; annually; changes	Pure Safety	HSE Manager/Supervisors
Hazards of Speeding- Large Vehicles	Best Practice	Initially; as needed	Pure Safety	
HAZWOPER	29 CFR 1910.120	Initially; annually	Outsource; pure safety	HSE Manager/Supervisors
Hearing Conservation	29 CFR 1910.95	Initially; as needed	Pure Safety	HSE Manager/Supervisors
Heat stress	Best Practice	Initially; as needed	Pure Safety	
Housekeeping on the job	Best Practice	Initially; as needed	Pure Safety	
Hydrogen Sulfide H2S	MSDS for H2S	Initially, every 3 years	Pure Safety	HSE Manager/Supervisors
Incident Reporting	Best Practice	Once, other not specified	Review Procedure	HSE Manager/Supervisors
Job Safety/environmental analysis	Best Practice	Once; other not specified	Review Procedure	HSE Manager/Supervisors
Lifting Equipment (cranes)	29 CFR 1910.1700	Once; other not specified	Review Procedure	HSE Manager/Supervisors
Load Sacrament and Distribution	DOT regulations	Initially; as needed	Pure Safety	
Lockout/Tag out	29 CFR 1910.147 (c)(7)	Initially; changes	Pure Safety	HSE Manager/Supervisors
Maintenance Yard Practices	Best Practice	Once; other not specified	Review Procedure	HSE Manager/Supervisors
New Employee Orientation	Best Practice	Once; other not specified	Pure Safety	Supervisors/clerical
Office Safety	Best Practice	Initially; as needed	Pure Safety	
Hand and Power Tools	Best Practice	Once; other not specified	Pure Safety	HSE Manager/Supervisors
Personal Protective Equipment	29 CFR 1910.132 (f)	Initially; changes	Pure Safety	HSE Manager/Supervisors

Kent Materials		Issue 8/2003
	SPILL CONTINGENCY PLAN	Rev. date 4/28/11

KENT MATERIALS, INC.
1555 Beaulieu Lane
Port Allen, LA 70756



**Safety
Management
Systems**

Prepared by
Safety Management Systems, Inc.
Lafayette, Louisiana

**CONTINGENCY PLAN
EMERGENCY PROCEDURES**

POLICE: 911
FIRE: 911
POISON CONTROL (800) 256-9822

PURPOSE

The purpose of this procedure is to:

- > Continue an ongoing effort to provide a safe and healthful work place.
- > Continue the training and development of employees.
- > Implement specific requirements for Contingency Planning and Evacuation Procedures associated with Hazardous Waste activities, 40CFR @ 264.50 Subpart D, Section 310 CMR 30.520-30.524.
- > Minimize hazards to human health and to environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soils, surface waters, or ground water.
- > Provide that this plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents (or the potential thereof, which could threaten human health or the environment.

SCOPE

This procedure applies to the administration and maintenance activities at Kent Materials located in Port Allen, LA. The maintenance facility is located on approximately 5 (five) acres and consists of 900 square feet of office space and 2000 square feet of shop space. A complete site and process description is provided in "section 2" of this program. The administrative office is located at 1555 Beaulieu Lane in Port Allen, LA. This procedure applies to all employees and contractors at both facilities.

***ALL EMERGENCY PROCEDURES MUST BE CARRIED OUT BY TRAINED
EMERGENCY RESPONSE PERSONNEL***

EMERGENCY PROCEDURES

1. STOP FLOW. Facility response personnel will attempt to stop the leak if feasible and if such can be done safely.

SPECIAL NOTE: If an emergency condition exists (any condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property) phone La. Dept. of Environmental Quality and State Police NOW ("Notification Phone List" included in this section). If no emergency exists, notifications will be made later (see item # 7).

2. WARN PERSONNEL. All personnel on facility will be warned of a major spill. If an explosion or fire occurs, evacuate personnel from the area until the danger is over.

3. SHUT OFF IGNITION SOURCES. Shut off any nearby internal combustion engines. Shut off electrical supply if facility near spill.

4. NOTIFY KENT MATERIALS MANAGEMENT (see contact list below)

5. REQUEST ADDITIONAL RESOURCES. If the spilled material has reached the water or could reach the water, facility personnel will decide whether the available on site containment materials are sufficient to contain the spill. If it is estimated that additional materials will be necessary, a third party emergency response team will be contacted at this time (see "Notification Phone List" in this section). An estimate of the amount of spilled material shall be relayed to the emergency response team.

6. CONTAIN THE SPILLED MATERIAL. Trained personnel will attempt to prevent the spilled material from spreading if feasible. Available containment materials will be deployed.

7. GATHER INFORMATION. Information on the spill will be collected and the "Spill Notification Form" will be completed (copy of this form is included in this section)

8. MAKE NOTIFICATIONS. Facility personnel will contact Company Management. Information on the spill along with actions taken will be relayed to Company Management and Company Management will make all necessary notifications (see "Notification Phone List" in this section). If Company Management is not available; facility personnel will make the notifications at this time.

9. CLEAN UP THE SPILLED MATERIAL. Once the spill is contained to the maximum extent possible, available supplies will be used to proceed with cleanup of the spill. An emergency response team may be mobilized depending upon the size of the spill.

EMERGENCY RESPONSE PHONE LIST

Personnel/Agency	Phone Number Contact	
Kent Materials Office	(225) 930-4512	Dispatch or Ms. Service
Brad Antie	(225) 235-0711 Mobile	General Manager
Louisiana State Police	(225) 925-6595	Within 1 hour of spill
Courtney Juneau or Gentry Perry	(337) 289-0020	SMS-Env. Consultants
Parish Emergency Management	List attached	Sheriff's Office
Local Fire Department	911	Dispatcher
Local Hospital	911	Dispatcher
Poison Information Center	(800) 256-9882	
FBI	(337)233-2164	

NOTIFICATION PHONE LIST

It is important that the notification process not be delayed if someone is unavailable. A list of reportable spill substances likely to be found at this facility is shown in the table located after the notification list.

Agency / Personnel	Note	Phone Number	Person to Contact or Comments
National Response Center (NRC)	1	1-800-424-8802 OR 1-202-267-2675	Washington D. C.
Emergency Response Commission (State Police) (also qualifies as DEQ contact; notify DEQ as courtesy)	3	1-225-925-6595	ONE CALL (collect calls accepted) Office of State Police
Louisiana Department of Environmental Quality	2	1-225-763-3908 OR 1-225-342-1234	Single Point of Contact for DEQ Office of Water Resources
Federal On-Scene Coordinator and Area Committee	4	(225) 389-0271	Coast Guard MSO Baton Rouge
Emergency Planning Committee Parish	3	See attached list	Sheriff's Office
EPA Hotline	4	(214) 665-2222	EPA Region 6
Company Management	6	(225) 637-2304	Steve Kent
Oil Spill Removal Organization	5,7	1-800-645-6671 1-877-437-2634	Oil Mop, Inc ES&H
Safety Management Systems	6	(337) 289-0020	Courtney Juneau or Gentry Perry

Notes:

1. OIL: Notify for all oil spills of any amount into navigable waters or adjacent shorelines as soon as detected. **CHEMICALS:** Notify for spills of a reportable quantity into the environment of any hazardous chemical listed in 40 CFR 302.4 (see table at end of this subsection).

2. EMERGENCY CONDITION: Notify within 1 hour for all spills of any substance and of any amount if emergency exists. **NON-EMERGENCY CONDITION:** Notify within 24 hours for spills of a reportable quantity of any substance listed in LAC 33:1.3931 (see table at end of this subsection). EMERGENCY CONDITION defined as any condition, which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property.

3. According to State Police regulation LAC 33:V. 10111: Notify “immediately if the release meets or exceeds the (release) reportable quantity (RQ) established for that substance herein, and the release escapes beyond the site of the facility”. According to State Police guidance documents, any release of a regulated hazardous material must be reported immediately if it causes any injury requiring hospitalization or any fatality or results in a fire or explosion which could reasonably be expected to affect the public safety beyond the boundaries of the facility or exceeds the reportable quantity during any continuous 24 hour period when that RQ could reasonably be expected to escape beyond the site of the facility or any incident, accident, or cleanup within a facility which could reasonably be expected to affect public safety beyond the boundaries of the facility or where the owner or operator knows a protective action beyond the boundaries of the facility have been initiated. However, State Police enforcement interpretation is any release of a regulated hazardous material must be reported immediately (State Police interpret all releases as having potential to impact public safety). See the table at the end of this subsection for RQ’s of typical substances listed in LAC 33:V. 10111. State Police interpret “immediate” to mean one hour or less.

4. Notify as a courtesy whenever another agency is notified.

5. Contact if needed

6. Notify for all spills of any substance

7. Contact if needed and when notified must be able to mobilize within 30 minutes of discovery of a worst-case discharge. A spill reporting form used to record release information can be found in this subsection.

REPORTABLE QUANTITIES

TITLE 30 PART 1 CHAPTER 327 RULE §327.4

Hazardous substances.

The Reportable Quantity (RQ) for hazardous substances are as follows:

for spills or discharges onto land--the quantity designated as the Final Reportable Quantity (RQ) in Table 302.4 in 40 CFR §302.4; or

for spills or discharges into waters in the state--the quantity designated as the Final RQ in Table 302.4 in 40 CFR §302.4, except where the Final RQ is greater than 100 pounds in which case the RQ shall be 100 pounds.

Oil, petroleum product, and used oil

The RQ for crude oil and oil other than that defined as petroleum product or used oil are as follows:

for spills or discharges onto land--210 gallons (five barrels); or

for spills or discharges directly into water in the state--quantity sufficient to create a sheen.

The RQ for petroleum product and used oil are as follows:

for spills or discharges onto land--25 gallons;

for spills or discharges directly into water in the state--quantity sufficient to create a sheen.

Industrial solid waste or other substances.

The RQ for spills or discharges into water in the state shall be 100 pounds.

Note: For spills containing chemicals not shown in the above list, refer to the appropriate regulations for determining the reportable quantity. If a mixture is released then the following is applicable per 40 CFR 302.6: "If the quantity of all of the hazardous constituents of the mixture or solution is known, notification is required where an RQ or more of any hazardous constituent is released". "If the quantity of one or more of the hazardous constituents of the mixture or solution is unknown, notification is required where the total amount of the mixture or solution released equals or exceeds the RQ for the hazardous constituent with the lowest RQ."

SPILL NOTIFICATION WRITTEN REPORTING REQUIREMENTS

In addition to verbal notification of spill events, written notification to certain government agencies is also required as indicated below. Contact the agency before submitting report to verify the accuracy of the information contained in the table and to receive the specific reporting requirements.

Agency	Written Reporting
U. S. EPA, Region 6 Water Management Division (6W-BA) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202	Report within 60 days of spill for: 1,000 gallons of oil into navigable waters 2 oil spills, any amount, in 12 month period in navigable waters Report within 14 days of spill for: substance of a reportable quantity into environment (substance other than oil)
Louisiana Department of Environmental Quality Post Office Box 4312 Baton Rouge, LA 70821-43 12 ATTENTION: SURVEILLANCE Division- SPOC "UNAUTHORIZED DISCHARGE NOTIFICATION REPORT"	Report within 30 days of spill for: any substance of a reportable quantity see LAC 33 for guidance on-line electronic completion: http://www.deq.state.la.us/surveillance/irf/forms/ .
Local Emergency Planning Committee (Report to parish in which incident has occurred)	Report within 5 days of spill for: any substance of a reportable quantity

DESCRIPTION OF FACILITY EMERGENCY RESPONSE EQUIPMENT

Alarms

KM is not a large quantity generator. As such, it requires no type of automatic alarm system for monitoring the storage of hazardous waste or hazardous materials. Storage or containment of such wastes and materials is limited to containment by DOT approved drums no larger than 55 gallons in size.

Spill Control

KM maintains spill absorbent pads at all buildings to handle any small spill, which would occur. Storage of waste oils and hazardous materials are located in diked areas sufficient to handle total failure of containers.

Decontamination Equipment

KM has no decontamination equipment on hand. Responsibility for such is held by the outside response team or our contracted waste hauler.

HAZAROUS MATERIALS/WASTE HANDLED

DOT NAME	HAZ CLASS	UNINA#	ON BAND/MO	NEPA RATING
Waste/Virgin Paint Related Material	Flam. Liq.	UN-1263	5 gal.	2-3-0-Flam
Batteries	Corrosive	UN 3028	5	
Paint Thinner	Flam-Liq.	UN-1 193	1 gal.	240*
Gasoline	Flam-Liq.	UN-1203	10 gal.	2-4-0

*The materials listed above are stored in quantities of 5 gallons or less (with the exception of batteries) and do not represent the quantity of the materials used monthly.

AISLE SPACE (264.35)

KM ensures that aisle space is provided on the floors of the maintenance shop. Aisle space is to remain unobstructed to ensure emergency response personnel access to all impending situations, at all times.

SPECIAL HANDLING PROCEDURES

KM maintains grounding and bonding practices on all containers, including, but not limited to, ignitable, combustibles and oxidizers.

ARRANGEMENTS With AUTHORITIES (264.37)

KM maintains arrangements with local authorities to respond to an incident at this facility when the security system is compromised or a phone call is made to a specific authority.

PRIMARY AUTHORITY

Should two or more emergency respond teams arrive at the scene of an incident at this facility, KM designates that the first authority to arrive will be the primary authority, unless they relieve themselves of that authority.

STATE EMERGENCY TEAMS

KM has determined that it is the responsibility of the primary authority at the scene to initiate the state response team to respond to the incident.

HAZWOPER TRAINING

All personnel involved in emergency response or oil spill response activities must comply with the Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations Standard (29 CFR 1910.120). This training is required for personnel involved in oil spill response activities if such activities involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards. The amount of training for the individual varies from none to as much as 40 hours depending on the hazards involved. The particular training provided will be based on the experience of the individual. Suggested topics are listed below:

Hazard recognition and evaluation, Site safety and security procedures, OSHA requirements, Key personnel responsible for site safety, Use of personal protective equipment, Safe work practices, Safe use of controls and equipment on site, Medical recognition of overexposure, Decontamination procedures, Spill Containment program

The requirement for HAZWOPER training is based on a worker being exposed to a safety and health hazard. For workers engaged in emergency response type activities, HAZWOPER training is required. For workers engaged in oil spill cleanup type activities, HAZWOPER training may be required depending on the hazards involved (subjective assessment).

*** SEE SAFETY MANUAL FOR TRAINING MATRIX.**

LIST OF EQUIPMENT (264.52K)

This list represents the emergency equipment located at the maintenance facility.

<u>Item</u>	
1	1996 Emergency Response Guidebook
2	Monthly Plant Chemical Listing
3	Empty 55 Gallon Drum W/Removable Lid
4	Push Brooms
5	Portable Pump
6	Absorbent Pads
7	Hazard Response Gloves
8	50 lb. Bag Speedy Dry
9	Cartridge Type Respirators
10	Drum Bung Wrench
11	55 Gallon DOT liquid drum
12	55 Gallon DOT dry pack drum

FACILITY EQUIPMENT

1	Fire Extinguishers
2	Eye Wash Stations
3	Eke Blankets
4	Stretcher
5	First Aid Stations

TRACTOR EQUIPMENT

1	1	1011 ABC Fire Extinguisher
2	1	Eye Wash
3	1 set PPE	Gloves, goggles, slicker suit, half-face respirator, boots
4	1	Shovel
5	1	Emergency Response Guidebook
6	1	First Aid Kit
7	1 set	Reflective triangles

Capabilities of emergency equipment at KM are deemed suitable for responding to an incident while waiting for professional help to arrive.

ATTACHMENT A

Spill Response Notification Form

Spill Response Notification Form

IT IS NOT NECESSARY To WAIT FOR ALL INFORMATION BEFORE CALLING NRC

Involved Parties

REPORTING PARTY

Name:

Phones:()

Company:

Position:

Address:

Address:

City:

State:

Zip:

Were Materials Released (Y/N)?

Calling for Responsible Party (YIN)

SUSPECTED RESPONSIBLE PARTY

Name:

Phones:()

Company:

Organization Type:

Private Citizen:

Private Enterprise:

Public Utility:

Local Government:

State Government:

Federal Government:

City:

State:

Zip:

Incident Description

Source and/or Cause of Incident:

Date: Time:

Incident Address/Location:

Distance and Direction from City:

Storage Tank Container Type -Above ground (Y/N)

Tank Capacity:

Latitude Degrees:

Longitude Degrees:

Mile Post or River Mile:

Cause:

Nearest City:

Below ground (Y/N)

Facility Capacity:

Materials

Discharged Quantity:

Quantity in Water:

Unit of Measure:

Discharged Material:

Response Action

Actions Taken to Correct or Mitigate Incident:

Impact

Number of Injuries:

Number of Fatalities:

Were there Evacuations (Y/N/U)?

Was there any Damage (Y/N)?

Number Evacuated:

Damage in Dollars:

Additional Information

Any information about the Incident not recorded elsewhere in the report.

Caller Notification

EPA

STATE

USCG

OTHER

National Response Center: 1400-424-8802

LEPC EMERGENCY RELEASE NOTIFICATION PHONE AND FAX LIST

Parish	Contact	Phone Number	FAX Number
Acadia	911 Dispatch	(337) 788-8772	(337) 783-7757
Allen	Oakdale Fire Department	(318)335-2820	(318)335-0575
Ascension	Sheriff's Office East Ascension	(225) 621-8300	(225) 647-4429
Assumption	Sheriff's Office	(985) 369-2912	(985) 369-9782
Avoyelles	Sheriff's Office	(318)253-4000	(318)253-9868
Beauregard	Sheriff's Office	(337) 463-3281	(337) 463-6347
Bienville	Sheriff's Office	(318)263-2215	(318)263-7418
Bossier	Bossier City Fire Dept.	(318) 741-8711	(318) 741-8739
Caddo	Shreveport Fire Dept.	(318) 675-2137	(318) 675-2238
Calcasieu	Emergency Preparedness	(337)439-9911	(337) 439-7657
Caldwell	Sheriff's Office	(318) 649-2345	(318) 649-5226
Cameron	Sheriff's Office	(337) 775-5111	(337) 775-5042
Catahoula	Sheriff's Office	(318)744-5411	(318) 744-5568
Claiborne	Sheriff's Office	(318)927-2011	(318)927-9819
Concordia	Sheriff's Office	(318) 757-3162	(318) 336-5210
DeSoto	Fire District#8	(318)872-4244	(318) 872-5504
East Baton Rouge	BRFD/Fire Communications	(225) 389-2055	(225) 389-2057
East Carroll	Sheriff's Office	(318)559-2800	(318)559-1912
East Feliciana	Sheriff's Office	(225) 683-5459	(225) 634-7267
Evangeline	Sheriff's Office	(337) 363-2161	(337) 363-7390
Franklin	Sheriff's Office	(318)435-4505	(318)435-5810
Grant	Sheriff's Office	(318)627-3261	(318)627-4114
Iberia	Sheriff's Office	(337)369-3711	(337)367-3807
Iberville	911Dispatch	(225)687-5140	(225)687-5146
Jackson	Sheriff's Office	(318) 259-9021	(318) 259-8268

26	Jefferson	Coordinator	(504) 349-5360	(504) 349-5366
27	Jefferson Davis	Jennings Fire Department	(337) 821-5508	(337) 821-5529
28	Lafayette	Sheriff's Office	(337) 236-5895	(337) 236-5679
29	Lafourche	Sheriff's Office	(985) 532-2808	(985) 532-2784
30	LaSalle	Sheriff's Office	(318)992-2151	(318)992-2155
31	Lincoln	Sheriff's Office	(318)251-5111	(318)251-5118
32	Livingston	Sheriff's Office	(225) 686-2241	(225) 686-2475
33	Madison	Tallulah Police Department	(318) 574-3230	(318) 574-2773
34	Morehouse	Sheriff's Office	(318)281-4141	(318)281-1820
35	Natchitoches	Sheriff's Office	(318) 352-6432	(318) 352-7377
36	Orleans	NOFD Fire Dispatch	(504) 483-2550	(504) 483-2561
37	Ouachita	Fire Department	(318) 343-1122	(318) 322-3998
38	Plaquemine	Sheriff's Office	(504) 682-1446	(504) 682-8632
39	Pointe Coupee	Sheriff's Office	(225) 694-3737	(225) 638-5408
40	Rapides	Communication District	(318)487-5787	(318)487-5789
41	Red River	Sheriff's Office	(318) 932-5753	(318) 932-6651
42	Richland	Sheriff's Office	(318) 728-2071	(318) 728-6454
43	Sabine	Sheriff's Office	(318) 256-9241	(318) 256-3409
44	St. Bernard	Fire Alarm Dispatch	(504) 271-0411	(504) 271-7343
45	St. Charles	Emergency Operations Center	(504) 783-5050	(504) 783-6375
46	St Helena	Sheriff's Office	(225) 222-4413	(225) 222-3225
47	St. James	Sheriff's Office	(225) 562-2200	(225) 562-2269
48	St John	E-9-1-1 Center	(985) 652-6338	(985) 652-2183
49	St. Landry	Sheriff's Office	(337) 948-9088	(337) 948-9139
50	St. Martin	Sheriff's Office	(337) 394-3071	(337) 394-5705
51	St. Mary	Sheriff's Office	(337) 828-1960	(337) 828-6946
52	St Tammany	Sheriff's Office	(985) 892-4141	(985) 898-5262
53	Tangipahoa	Sheriff's Office Communications	(504) 748-8977 (504) 748-8981	(504) 748-8977

54	Tensas	Sheriff's Office	(318) 766-3961	(318) 766-4291
55	Terrebonne	Houma Police Department	(985) 879-3568	(985) 580-0976
56	Union	Sheriff's Office	(318)368-3124	(318)368-2065
57	Vermillion	911 /Fire Alarms	(337) 898-4350	(337) 898-4353
58	Vernon	Sheriff's Office	(337)238-1311	(337)238-4987
59	Washington	Fire Department/OEP HQ	(504) 732-5200	(504) 732-5830
60	Webster	Sheriff's Office	(318) 377-1515	(318) 371-4314
61	West Baton Rouge	Sheriff's Office	(225) 343-9234	(225) 344-1004
62	West Carroll	Sheriff's Office	(318) 428-2331	(318) 428-8889
63	West Feliciana	Sheriff's Office	(225) 635-3241	(225) 635-3255
64	Winn	Winnfield Fire Department	(318)628-3922	(318)628-7591

OTHER

FROM :NJRO

FAX NO. :3186767573

Jun. 27 2005 10:09PM P2

DISPATCH #: _____ INCIDENT #: _____

LOUISIANA NOTIFICATION REQUIREMENTS

This form should be completed and submitted to the Surveillance Division within seven (7) calendar days after verbal notification.

If mailed, submittal date will be the postmark date of the written notification. Forward to:

ADMINISTRATOR
LOUISIANA DEPARTMENT 01* ENVIRONMENTAL QUALITY
Surveillance Division
P.O.Box.4312
BatonRouge,LA782L—4312

or

Regional Office

1. Name of person, company or other party who is filing the written report.
2. Time and date of verbal notification, name of person making the notification, and identification of the site or facility. (Name and address).
3. Release date and time.
4. Spill details and/or emergency condition.
5. Product released and estimated quantity released in gallons.
6. Surface or groundwater impact.

7. Action taken to stop release.

8. Measures taken to prevent recurrence of the incident.

9. Is **the** UST System registered?

ANSWER THE FOLLOWING ONLY IF GROVNDWATER CONTAMINATION IS CONFIRMED

1. Reporting party status (owner, **operator**, consultant. etc)

2. Attach groundwater contamination **data** and/or analytical results.

3. Possible routes of migration.

4. List all abandoned or active water wells within the immediate area.

5. Name of all other responsible parties.

Policy

It is the policy of Kent Materials to eliminate, reduce, avoid and/or control potential exposures associated with the vacuum truck operations.

Procedure

Vacuum Truck Operations pose a variety of hazards in petroleum facilities that include, but are not limited to toxic vapors and the PEL's and STEL's, flammable atmospheres, sources of ignition, spills and releases, fires / explosions, slip / falls, motor vehicle accidents and accidents within the facility.

Prior to beginning operations, vacuum truck operators obtain required permits and inspect their vacuum trucks, equipment, and loading / off loading sites to assure safe operations.

Atmospheric Testing

Areas where vacuum trucks operate must be free of hydrocarbon vapors in the flammable range. Areas where vacuum truck operators and others work without the use of respiratory protection must be at or below air contaminant PEL's/STEL's. If it is unknown whether the area is vapor or toxic gas free, atmospheric testing is performed by a qualified person using properly calibrated and adjusted detectors. Testing is conducted prior to beginning any operations, and during operations when the area is subject to change such as automatic pump start-up or product receipt into, or transfer out of a tank located in vicinity of the transfer operation; when off-loading; when atmospheric conditions change such as wind direction, when an emergency situation such as product release occurs within the facility that may also affect atmospheric conditions in the transfer area.

Hoses

Vacuum hose constructed of conductive material or thick walled hose with imbedded conductive wiring, are used when transferring flammable and combustible liquids when the potential for a flammable atmosphere exists in the area of operations. Conductive hose provides suitable electrical conductance less than or equal to 1 mega ohm per 100 feet (as determined by the hose manufacturer). Thin walled metallic spiral-wound conductive hoses are prohibited to be used because of the potential for electrical discharge through the thin plastic that covers the metal spiral.

Grounding and Bonding

The complete vacuum transfer system is bonded so that there is a continuous conductive path from the vacuum truck (through the hose and nozzle) to the tank or source container and grounded to dissipate stray currents to earth (ground). Prior to starting transfer operations, vacuum truck must be grounded directly to the earth or

bonded to another object that is inherently grounded (due to proper contact with the earth) such as a large storage tank or underground piping. A safe and proper ground to earth may be achieved by connecting to any properly grounded object including but not limited to any one or more of the following examples: a metal frame of a building, tank, or equipment that is grounded. An existing facility grounding system such as that installed at a loading rack. Fire hydrants metal light posts, or underground metal piping with at least 10' of contact with earth. A corrosion free metal ground rod of suitable length and diameter (approximately 9' long and 5/8-in. diameter), driven 8' into the earth (or to the water table, if less).

Ignition Source

Under normal conditions, the absence of oxygen minimizes the risk of ignition in a vacuum truck. However, operating rotary lobe blowers and vacuum pumps at high speeds creates high air movement and high vacuum levels, resulting in high discharge air temperatures and high discharge vapor concentrations that can present potentially ignitable conditions.

Exhaust Venting

A number of methods can be used by vacuum truck operators to safely vent vacuum pump exhaust vapors, including but not limited to the following:

- Operators can prevent dieseling by locating the vacuum truck upwind of vapor sources and by extending the vacuum pump discharge away from the diesel engine air intake;
- Vapors may be returned to the source container using conductive and closed connections;
- Vapors may be vented into the atmosphere to a safe location using a safety venturi;
- Vacuum truck operators may provide vertical exhaust stacks, extending approximately 12' above the vacuum truck (or higher if necessary), to dissipate the vapors before they reach ignition sources or other potential hazards and personnel;
- Vacuum truck operators may attach a length of exhaust hose to the vacuum exhaust that is long enough to reach an area that is free from potential hazards, sources of ignition, and personnel. The hose should be preferably extended 50' downwind of the truck and away from the source of the liquids.

Personal Safety

Vacuum truck personnel working in petroleum facilities are:

- Trained in the safe operation of the vacuum equipment;
- Familiar hazards of the petroleum products, by-products, wastes and materials being transferred, aware of relevant government and facility safety procedures and emergency response requirements;
- MSDS;
- Appropriate PPE;
- All personnel must leave the vacuum truck cab during loading and off-loading operations;
- When transferring flammable liquids or hazardous materials, vacuum truck operators must remain positioned between the vacuum truck and the source or receiving tank, vessel, or container and within 25' of the vacuum truck throughout the duration. Vacuum truck operators monitor the transfer operation and must be ready to quickly close the product valve and stop the pump in the event of a blocked line or release of material through a broken hose or connection;
- Smoking, or any other source of ignition, is not permitted within at least 100' (depending on local procedures and atmospheric conditions) of the truck, the discharge of the vacuum pump, or any other vapor source.

Safe Vehicle Operation & Qualified Operators

To help ensure safe operations, the following must be adhered to:

- Vacuum truck operators are trained and properly licensed in accordance with applicable regulations;
- Vacuum trucks are not to enter into tank dike area until such areas have been checked/monitored and rendered safe;
- Vacuum trucks cargo tanks must be depressurized;
- Vacuum truck operators must be aware of the effect of speeds, turns and the changing center of gravity;
- Vacuum truck operators must maintain proper distances when operating vacuum trucks inside facilities with restricted clearances.

Training

Safe Vacuum Truck operation training is accomplished through the review of this policy and procedure. Safe Vacuum Truck Operations training is provided initially, and whenever there is a need to retrain personnel.

Kent Materials, Inc.

Code of Business Conduct

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To All Employees of Kent Materials, Inc.:

The Kent Materials, Inc. Code of Business Conduct, which is explained and summarized in this booklet, is a guide for every employee and agent in applying legal and ethical practices to their everyday work. The Code describes not only our standards of integrity but also some of the specific principles and areas of the law that are most likely to affect us.

There is no quality more important than integrity. This applies to a business just as it does to an individual. Integrity is a core value in our Code of Business Conduct.

Certain situations may arise which are not covered in our Code of Business Conduct. If you have any questions concerning the legality or propriety of an action, or the meaning of the Code, you should contact the Company's Operation Manager for clarification.

Compliance with the law and honesty and integrity in our dealings with others are not to be sacrificed in the name of profits. Management does not and will not condone any such action.

Our success will be attained through compliance with the law, dealings evidencing fairness and integrity and a commitment to quality. We expect your whole-hearted support of these Company values and principles.

Steven W. Kent, President

Gerard Smith, President

General Policy Regarding Laws and Business Conduct

The Code of Business Conduct of Kent Materials, Inc. (the “Company”) consists of the policies relating to the ethical and legal standards of conduct to be followed by managers, employees and agents of the Company in the conduct of its business. The Code of Business Conduct applies to all Company Managers, employees and agents.

It is the policy of the Company to comply with applicable law. Some Company policies are based on the requirements of applicable law and others are just good ethics and business sense. The Company is organized under United States law and is a privately owned company.

It is the personal responsibility of each Company Manager, employee and agent to observe the standards of conduct and other requirements of the Code of Business Conduct whether or not these standards and requirements are also imposed by law. Any Manager, employee or agent who does not comply with these standards and requirements is acting outside the scope of his or her employment, responsibilities or agency.

The underlying formal policies themselves have more detail than is contained in this booklet. It is the responsibility of each Manager, employee or agent to familiarize himself or herself with the details of the policies of the Company that apply to his or her assigned duties.

Ethical Business Practices

Company policy requires Managers, employees and agents to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Managers and employees must practice fair dealing, honesty and integrity in every aspect of dealing with other Company employees, the public, the business community, shareholders, customers, suppliers, competitors and government authorities. When acting on behalf of the Company, Managers and employees shall not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair-dealing practices.

Company policy prohibits unlawful discrimination against employees, Managers, officers, customers or suppliers on account of race, color, age, sex, sexual orientation, religion or national origin. All persons shall be treated with dignity and respect and they shall not be unreasonably interfered with in the conduct of their duties and responsibilities.

No Manager or employee should be misguided by any sense of loyalty to the Company or a desire for profitability that might cause him or her to disobey any applicable law or Company policy. Violation of Company policy will constitute grounds for disciplinary action, including, when appropriate, termination of employment.

Sensitive Transactions

Company policy prohibits its Managers, employees and agents from entering into sensitive transactions. If such a transaction occurs, the Company and its officers, Managers and employees directly involved may be subject to fines, imprisonment and civil litigation.

The term “sensitive transactions” is commonly used to describe a broad range of business dealings generally considered to be either illegal, unethical, immoral or to reflect adversely on the integrity of the Company. These transactions are usually in the nature of kickbacks, gifts of

significant value, bribes or payoffs made to favorably influence some decision affecting a company's business or for the personal gain of an individual.

Company policy prohibits the Company and its officers, Managers, employees and agents from corruptly offering or giving anything of value to directly or indirectly, for the purpose of influencing any act or decision of these officials in their official capacity or in violation of their lawful duties or to secure any improper advantage in order to help the Company obtain or retain business or direct business to any person.

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Commercial Bribery

Company policy prohibits commercial bribes, kickbacks and other similar payoffs and benefits paid to any suppliers or customers.

Managers, employees and agents are also prohibited from receiving, directly or indirectly, anything of a significant value (other than salary, wages or other ordinary compensation from the Company) in connection with a transaction entered into by the Company.

Bribery of suppliers or customers includes any payment for the benefit of any representative of the supplier or customer. It includes:

- Gifts of other than nominal value;
- Cash payments by Managers, employees or third persons, such as agents or consultants, who are reimbursed by the Company;
- The uncompensated use of Company services, facilities or property, except as may be authorized by the Company; and
- Loans, loan guarantees or other extensions of credit.

This policy does not prohibit expenditures of reasonable amounts for meals and entertainment of suppliers and customers which are an ordinary and customary business expense, if they are otherwise lawful. Expenditures of this type should be included on expense reports and approved under standard Company procedures.

Accounting Controls, Procedures and Records

Applicable laws and Company policy require the Company to keep books and records that accurately and fairly reflect its transactions and the dispositions of its assets. In addition, the Company must maintain a system of internal accounting controls that will ensure the reliability and adequacy of its books and records. Failure to meet such requirements may constitute a violation of law.

To satisfy these requirements, the Company has adopted policies to ensure that only proper transactions are entered into by the Company, that such transactions have proper management approval, that such transactions are properly accounted for in the books and records of the Company, and that the reports and financial statements of the Company are timely prepared,

understandable and fully, fairly and accurately reflect such transactions. All Managers and employees having any responsibility for such functions must be familiar with the Company's policies, accounting controls, procedures and records, and must comply with their requirements.

Use and Disclosure of "Inside Information"

The laws of the United States and many other countries regulate the use and disclosure of nonpublic information concerning the Company because its shares are publicly traded. This information is often

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referred to as "inside information" because it has not been publicly disclosed. The Company has policies (based in part on such laws) concerning the use and disclosure of inside information.

Company policy prohibits the disclosure of inside information to anyone other than persons within the Company whose positions require them to know such information.

A Manager, employee or agent shall not trade in the securities of another company if, in the course of his or her employment or due to his or her position with the Company, nonpublic information is learned about such other company that is likely to affect the price of such securities.

Company Managers, employees and agents are discouraged from short-term speculation in the securities of the Company.

Confidential or Proprietary Information

Company Managers, employees and agents often learn confidential or proprietary information about the Company or its customers. Company policy prohibits Managers, employees and agents from disclosing or using confidential or proprietary information outside the Company or for personal gain, either during or after employment, without proper written Company authorization to do so. An unauthorized disclosure could be harmful to the Company or a customer or helpful to a competitor.

The Company also works with proprietary data of customers, suppliers and joint venture partners. This is an important trust and must be discharged with the greatest care for the Company to merit the continued confidence of its customers, suppliers and joint venture partners. No Manager, employee or agent shall disclose or use confidential or proprietary information outside the Company without Company authorization, nor shall any Manager, employee or agent disclose such information to other employees except on a need-to-know basis.

Conflicts of Interest

Company policy prohibits conflicts between the interests of its Managers or employees and the Company. A complete definition of what constitutes a conflict of interest is difficult. There are some situations, however, that will always be considered a prohibited conflict of interest. These

situations occur when a Manager or employee or any person having a close personal relationship with the Manager or employee:

- Obtains a significant financial or other beneficial interest in one of the Company's suppliers, customers or competitors without first notifying the Company and obtaining written approval from the President or his or her designee;
- Engages in a significant personal business transaction involving the Company for profit or gain, unless such transaction has first been approved in writing by the President or his or her designee;
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- Accepts money, gifts of other than nominal value, excessive hospitality, loans, guarantees of obligations or other special treatment from any supplier, customer or competitor of the Company (loans from lending institutions at prevailing interest rates are excluded);
- Participates in any sale, loan or gift of Company property without obtaining written approval from the President or his or her designee;
- Learns of a business opportunity through association with the Company and discloses it to a third party or invests in or takes the opportunity personally without first offering it to the Company;
- Uses corporate property, information, or position for personal gain; or
- Competes with the Company.

A conflict of interest may arise because of outside Manager ships, personal use of Company property or obtaining Company services for personal benefit.

“Person having a close personal relationship with the Manager or employee” refers to the Manager's or employee's spouse, parents, children, siblings, mothers- and fathers-in-law, sons- and daughters-in-law, brothers- and sisters-in-law, any person living in the same house with the Manager or employee or any business associate of the Manager or employee.

Periodically the Company requires certain employees to certify to the Company that they have complied with all requirements of the Code of Business Conduct. Disclosure of a particular situation that may be a conflict of interest does not mean that the Company will consider it to be substantial enough to be prohibited. Each situation will be considered on an individual basis.

Fraud and Similar Irregularities

Company policy prohibits fraud and establishes procedures to be followed concerning the recognition, reporting and investigation of suspected fraud. Fraud includes, but is not limited to:

- Dishonest or fraudulent act;
- Embezzlement;

- Forgery or alteration of negotiable instruments such as Company checks and drafts;
- Misappropriation of Company, employee, customer, partner or supplier assets;
- Conversion to personal use of cash, securities, supplies or any other Company asset;
- Unauthorized handling or reporting of Company transactions; and
- Falsification of Company records or financial statements for personal or other reasons.

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Managers and employees *are* obligated to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste of Company assets by Managers and employees are prohibited since such actions and conduct have a direct and negative impact on the Company's profitability. All Company assets shall only be used for the legitimate business purposes of the Company.

Any Manager, employee or agent who suspects that any fraudulent activity may have occurred is required to report such concern to the Law Department, Audit Services, Security Department, or the Company's Operation's Manager. All fraud investigations will be conducted under the direction of the Law Department.

Employment and the Workplace

Equal Employment Opportunity

Company policy prohibits all unlawful discrimination against any employee or applicant for employment. The Company is committed to providing equal opportunity to all qualified individuals in its hiring and promotion policies. The Company will endeavor to create a workforce that is a reflection of the diverse population of the communities in which it operates.

With respect to operations governed by United States law, this policy relates to all phases of employment, including recruitment, hiring, placement, promotion, transfer, compensation, benefits, training, educational, social and recreational programs, and the use of Company facilities. It covers all other personnel actions in all job categories and at all levels, including employment of qualified disabled individuals, disabled veterans and veterans of the Vietnam era. It is intended to provide employees with a working environment free of discrimination, harassment, intimidation or coercion relating directly or indirectly to race, color, religion, sex, sexual orientation, age, disability or national origin.

All Managers, members of management and other employees shall actively support this policy.

Harassment

The Company believes that all employees should be treated with dignity and respect. It is the policy of the Company to provide a work environment which is free from harassment.

As used in this policy, harassment includes sexual, racial, ethnic, and other forms of harassment, including harassment based upon disability. Some examples, depending on the facts and circumstances, include:

- Verbal or Written Harassment –unwelcome or derogatory comments regarding a person's race, color,

sex, sexual orientation, religion, ancestry, ethnic heritage, mental or physical disability, age or appearance; threats of physical harm; or the distribution of material having such effects, including by electronic mail or display in any Company work area.

- Physical Harassment – hitting, pushing or other aggressive physical contact or threats to take such action, or inappropriate gestures.
- Sexual Harassment – unwelcome sexual conduct, whether verbal or physical, including sexual advances, demands for sexual favors, or other verbal or physical conduct of a sexual nature, whether or not it was designed or intended to promote an intimate relationship.

It is not considered harassment for supervisors and other members of management to enforce job performance and standards of conduct in a fair and consistent manner.

Any employee who believes she or he is being harassed should consider telling the offending party that she or he objects to that conduct. This often solves the problem. However, if an employee is not comfortable confronting the offending party (or if the offending party's unwelcome conduct continues), the employee should advise his or her immediate supervisor of the offending conduct. If the employee is more comfortable discussing the issue with someone other than his or her immediate supervisor, or if the immediate supervisor has not taken what the employee regards as appropriate action to solve the problem, the employee should contact a Human Resources or Law Department representative.

Reports of harassment will be investigated promptly and discreetly.

Any employee who reports any act of harassment in good faith, including sexual harassment, will not be retaliated against because of such report.

Political Activities

The Company believes strongly in the democratic process. Its Managers and employees should take an active interest in fostering principles of good government in the countries and communities in which they live. Managers and employees may spend their own time and funds supporting political candidates and issues, but they will not be reimbursed by the Company. Managers and employees should ensure that their personal political contributions and activities are in compliance with applicable law.

Further, some political conduct which is permitted and encouraged for individuals is unlawful for corporations.

Company policy requires Managers, employees and agents who represent the Company in political and governmental matters to comply with all laws regulating corporate participation in public affairs. To assure that these requirements are met and as guidance to them, the following policies have been adopted:

- No Manager, employee or agent shall apply any pressure on any other employee that infringes that individual's right to decide whether, to whom and in what amount a personal political contribution is to be made;
- No contributions of Company funds, property or services shall be made in support of political candidates for federal office in the United States or in certain states or other countries where such contributions are prohibited. Indirect expenditures on behalf of a candidate, such as travel on a Company aircraft, may be considered as contributions in this regard;

- No political contribution of Company funds, property or services can be made by the Company, except in accordance with a plan approved by the President;
- When permitted by law and authorized by the President, Company funds and facilities may be used to provide administrative support for the operation of political action committees or programs, the purposes of which include the disbursement of financial contributions made by certain employees, shareholders and/or others to political parties or candidates. No Company funds, facilities or other property will be used for other than administrative support of such a committee;
- When permitted by law and authorized by the President, expenditures of Company funds may be made to inform or influence the voting public on an issue of importance to the business of the Company and its shareholders.

If an employee or Manager is requested to make a political contribution or to provide assistance on behalf of the Company, whether personal or corporate, and such employee or Manager has any questions regarding this Company policy or applicable law, the employee or Manager should contact the Company's President.

United States Federal Government Contracting

To ensure that the Company complies with federal regulations on United States governmental contracts, all employees involved in the performance of work under governmental contracts are to be adequately informed and sufficiently trained in the policies and practices contained in the Code of Business Conduct and other Company policies specifically relating to government contracting. Each business unit manager with contracts with the United States government is responsible for ensuring that training sessions regarding these policies are conducted and that the training sessions are properly documented.

The Company takes appropriate, timely action to correct violations of United States governmental standards. If any employee has a question on the propriety of a transaction, the employee must report the transaction to the immediate supervisor. If the supervisor finds the question to have substance, the supervisor must report the transaction to the General Counsel or his or her designee. The supervisor must advise the employee of the action the supervisor has taken. If the employee disagrees with the supervisor or if the employee is not comfortable reporting the transaction to the supervisor, the employee may contact the General Counsel or his or her designee directly.

When cost and pricing data are required to respond to a government solicitation, the cost and pricing data must be current, accurate, and complete at the time of submission. All costs are to be properly recorded, documented, and retained in compliance with United States federal procurement regulations. Each business unit doing business with the United States government must invoice the government in strict compliance with United States governmental cost principles and other United States federal regulations.

Many United States governmental projects in which the Company participates may involve

classified or proprietary materials or information. In these cases, the Company complies with all United States

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government security regulations to prevent unauthorized access, distribution, or use of any classified information.

The Company complies with applicable United States federal statutes and regulations governing the employment of former United States military, Department of Defense, or other federal employees. When the Company contemplates hiring a former United States governmental employee or engaging the employee as a consultant the responsible business unit manager shall consult with the Operations Manager for guidance.

Confidential Reporting of Alleged Code Violations

If you need advice or assistance or know of a violation of the Code of Business Conduct, you should contact management in person or by telephone.

1. You may refrain from identifying yourself (although, in the absence of such identification, the Company may have insufficient information to investigate the allegations).
2. No retribution shall be imposed on you for making the report in good faith unless you are one of the violators.
3. Your confidentiality shall be maintained unless disclosure is:
 - Required or advisable in connection with any governmental investigation or report;
 - In the interests of the Company, consistent with the goals of the Code; or
 - Required or advisable in the Company's legal defense of the matter.

Training

Code of Business Conduct training is conducted during employee orientation.

KENT MATERIALS LLC

SAFETY AND HEALTH PROGRAM EMPLOYEE ACKNOWLEDGMENT

Employee Name _____ Date Hired. _____

Social Security No. _____

The undersigned employee acknowledges that he/she knows the location of the Safety and Health Program, has read the Program and understands the contents of the Program. If the undersigned is unable to read, he/she acknowledges that the contents of the Safety and Health Program have been explained to him/her and that he/she understands it.

Complying with all stated policies, including safety, is a condition of employment with this entity.

Signature _____ Date _____