SAFETY PROGRAM

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1. SAFETY POLICY STATEMENT

It is the policy of ATX Environmental Solutions, LLC, to work continually toward improving safety policy as well as safety procedures. The personal safety and health of each employee are of primary importance. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health in keeping with the highest standards.

We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody the proper attitudes toward injury and illness prevention on the part of both onsite supervisors and employees. It also requires cooperation in all safety and health matters, not only between onsite supervisors and the employees, but also between each employee and his or her fellow workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved.

Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of other operations similar to ours.

We recognize that the responsibilities for safety and health are shared.

- The company accepts the responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the guidance and assistance to ensure safe working conditions.

- Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.

- Employees are responsible for the wholehearted, genuine cooperation with all aspects of the safety and health program, including compliance with all rules and regulations, and for continuously practicing safety while performing their duties.

Management considers no phase of the operation more important than the health and safety of the employee. Management will continue to be guided and motivated by this policy and, with the cooperation of all supervisors and employees, will actively pursue a safer working environment throughout the company.

_____

PAUL KIM, President

2. SAFETY POLICY ASSIGNMENT OF RESPONSIBILITIES

The **President, Administrative Safety Coordinator and Supervisors of ATX Environmental Solutions, LLC** are responsible for maintaining safe work practices in their respective units, including required health and safety training.

ATX Environmental Solutions, LLC requires all employees to comply with health and safety regulations, with policies and procedures that apply to their own conduct on the job, and to report accidents, injuries, and unsafe conditions to their supervisor. Failure to comply with these regulations, policies and procedures will be considered inappropriate conduct as outlined in the ATX Environmental Solutions, LLC Employee Handbook, and is subject to disciplinary action, up to and including termination.

The **Administrative Safety Coordinator, along with the President and Supervisors of ATX Environmental Solutions, LLC** will assume the responsibility for enforcing the program. In addition, the **Administrative Safety Coordinator** will be responsible for all documentation and records developed as a result of safety training, meetings, accident investigations and hazard reports required by this plan.

3. SAFETY TRAINING

ATX Environmental Solutions, LLC requires that all personnel who work onsite at _____ complete the **OSHA 10 Hour Safety Course** in addition to completing the required safety protocols of _____. ATX Environmental Solutions, LLC (ATX) is responsible for the registration and payment for these courses; however, it is the responsibility of the employee to follow the safety guidelines and procedures outlined therein.

Additionally, all Supervisors of ATX are required to complete the **OSHA 30 Hour Safety Course** within 30 days of hire. OSHA Safety courses of a higher stature (i.e. OSHA 510 or 500) will also be accepted; however, ATX Environmental Solutions, LLC is not responsible for payment for these classes.

Specialized training such as forklift, crane, HAZCOM, etc., will be provided and documented before employees are required to perform tasks involving these exposures.

Reports will be filed in a log and maintained for a period of 24 months or as required by law or directives.

All employees who will be working on site at _____ will also receive the _____ site-specific safety orientation before they are able to begin work onsite. Administered by _____, all records are kept by them.

A NEW EMPLOYEE Training and Orientation is given to each new employee prior to any work assignments. This training and orientation consists of an onsite tour of the job site facilities and

review of all safety requirements specific to the new employee's job function. If at any point an employee has a change in job function that requires additional, revised, or new safety training, this training will be provided to them prior to any work assignments.

SAFETY Topics are also incorporated into the DAILY team meetings. These topics and attendance records are maintained as part of the WEEKLY TOOLBOX as required by and submitted to _____. The topics discussed include but are not limited to the most common and most pertinent safety protocols and procedures as well as any safety violations reported by ATX or any other _____ affiliated company.

Each employee evaluation incorporates new and old safety training. In addition, any time there is an update to our safety program, our employees receive additional safety training. At a minimum, this training occurs ANNUALLY and covers all topics addressed in this manual as well as topics addressed in the "EHS Rules and Information, Handbook for Contractors, Suppliers and Vendors" provided by _____.

Additionally, ATX offers more comprehensive and detailed Safety Training Material, which addresses and follows safety guidelines as outlined by the Occupational Safety and Health Administration (OSHA). These more detailed manuals must be read and reviewed by Safety Managers and Safety Representatives and are used for addressing specific safety topics as part of annual or on the job "as needed" training.

Roles and Responsibilities

Safety in the workplace is every employee's responsibility; however, individuals in leadership positions should set an example and drive the safety culture within the company. Based on the specific leadership role, ATX sets the following expectations:

1. Project Manager
    a. Ensure management is involved in daily safety decisions and participates in ownership of responsibility for work crew safety performance.
    b. Ensure there is a reasonable supervisor/worker ratio so that safety can be adequately managed by the supervisors.
    c. Hold employees accountable for safety performance and administer safety discipline procedures as needed.
    d. Ensure company policies and procedures are implemented on site (equipment needed for the job, equipment inspections, etc.). Ensure site-specific requirements are incorporated in the job plan.
    e. Involve the Safety Manager and Safety Representatives in any situation with potential for high-risk tasks.
    f. Attend required ATX and _____ safety meetings.

2. Safety Manager/Safety Representatives

a. Coordinate and enforce all safety onsite.
b. Work in field at least 75% of the time..
c. Attend all _____ safety meetings and report necessary information to ATX team.
d. Organize and hold weekly (at a minimum) safety toolbox meetings with ATX team. This includes documenting the topics covered and recording attendance.
e. Investigate all incidents and submit required report to ATX managers and _____, including corrective action plans.

3. Supervisors/Team Leaders
    a. Ensure team/work crew conforms to all safety requirements.
    b. Ensure all employees performing tasks have the appropriate level of training and qualifications to perform said tasks.
    c. Involve the Safety Manager/Representative in any situation with the potential for high-risk tasks.
    d. Administer safety discipline procedures as needed.

4. Employees
    a. Comply with all work site safety rules and regulations.
    b. Ensure work tools, materials, equipment and PPE are properly inspected, in good condition and properly maintained.
    c. Report any incident or safety issue to immediate supervisor.

All managers, supervisors and employees are responsible for conducting daily pre-task safety plans (PTPs) before beginning work. Once potential hazards have been identified, a plan is implemented to reduce or eliminate each hazard. The hazards are written with the work crew and with any other groups/people that are affected by the work. If any of the conditions or hazards change the work is stopped and the PTP revised. Prior to restarting work, the PTP is initialed by all the impacted workers/crews. PTPs are posted in the immediate work area.

4. AUTHORITY AND ACCOUNTABILITY of ATX ENVIRONMENTAL SOLUTIONS, LLC

The **Administrative Safety Coordinator** accepts the responsibility for providing resources and guidance for the development and implementation of the safety and health program.

The **Administrative Safety Coordinator and Supervisors** are responsible and will be held accountable for the overall implementation of the working plan.

The **Supervisors** will be responsible for ensuring that all employees follow all safety and health policies, procedures, and rules established by the company.

The **Administrative Safety Coordinator** is also responsible for administering training and guidance to employees.
Employees of ATX Environmental Solutions, LLC will assist the company with commitment to the safety and health program, abiding by the policies, procedures, rules set forth by the program, and becoming actively involved in the program to assist in providing a safe and healthful workplace for all involved.

Employers of outside contractors that provide or perform services for **ATX Environmental Solutions, LLC**, are responsible to ensure that all employees, and services provided by employees, are performed and delivered in a manner that is consistent with our commitment to safety and health.

The **ATX Environmental Solutions, LLC Accident Prevention** plan will be made available for review by all employees.

5. ANNUAL REVIEW ACCIDENT PREVENTION PLAN

The **Administrative Safety Coordinator** will review the Accident Prevention Plan on an annual basis.

This review will be to determine if all areas of exposure are addressed in the accident prevention plan.

Any new hazards identified during the review will be included in the accident prevention plan and employees will receive immediate training when required.

Annual reviews will be documented showing date of review and any new areas of exposure identified.
Documentation will be maintained by the **Administrative Safety Coordinator.**

6. SAFETY PLAN REVIEW

The Safety Manager or Safety Representative will review the Accident Prevention Plan on an annual basis.

This review will be to determine if all areas of exposure are addressed in the accident prevention plan.

Any new hazards identified during the review will be included in the accident prevention plan and employees will receive immediate training when required.

Annual reviews will be documented showing date of review and any new areas of exposure identified.

Documentation will be maintained by the Safety Manager or Safety Representative**.**

7. ACCIDENT/INJURY ANALYSIS

The **Administrative Safety Coordinator** will review all accident investigation reports, hazard reports, incident reports, inspection reports and the OSHA-300 form on a continuous basis as needed to identify any trends in accidents or hazards that may be developing both at our company locations and our clients.

The **Administrative Safety Coordinator** will recommend corrective actions to be taken to prevent reoccurrence of similar accidents or hazards. The **Administrative Safety Coordinator** will be responsible for implementing corrective actions.

Documentation of these reviews will be retained by **ATX Environmental Solutions, LLC** for a period of 12 months.

8. ANALYSIS AND REVIEW

The **Administrative Safety Coordinator** will review and analyze all records and documentation pertaining to the safety and health program. This review will be conducted on a continuous basis and will focus on hazard analysis and recognition of developing trends.

Trend analysis will identify recurring accidents and near miss incidents resulting in, or potentially involving injury, illness, or property damage. The analysis will also recognize repeatedly identified hazards/violations needing corrective action to establish what program component is failing that allow the hazard to exist.

The **Administrative Coordinator and Supervisors** will provide information and recommendation for corrective measures for trends developing as a result of the analysis and review.

Employees will be made aware of developing trends and hazard exposures as they are recognized.

Trends of accidents or hazard recurrences will be the focal point for corrective action and employee training as needed.

The **Supervisors** will follow up with the **Administrative Safety Coordinator** on corrective measures, ensuring the causing factor has been eliminated or controlled.

Employee training records will also be reviewed on a regular basis to ensure an adequate and effective training program is maintained. **Employees** will also be interviewed from time to time to establish retention of training and determine when information should be supported or repeated.

9. RECORDKEEPING

ATX Environmental Solutions, LLC believes that the only valid means of reviewing and identifying trends and deficiencies in a safety program is through an effective recordkeeping program. The recordkeeping element is also essential in tracking the performance of duties and responsibilities under the program.

ATX Environmental Solutions, LLC is committed to implementing and maintaining an active, up-to-date recordkeeping program.

10. INJURY AND ILLNESS DATA

The **Administrative Safety Coordinator** will maintain records of all work related injuries and illnesses to our associates or the employees.

The following records are applicable only to work related injuries and illnesses.

Applicable forms or records:

- OSHA Form 300 - Record of Occupational Illness and Injuries;
- Applicable State Workers' Compensation Form, First Report of Injury;
- Record of first aid or other non-recordable incidents and;
- ATX Environmental Solutions, LLC's Supervisor Accident Investigation Reports (when injuries are involved).

Accident and injury records will be kept by the **Administrative Safety Coordinator** for a period of five (5) years. All data pertaining to injuries or illnesses that did not require medical treatment, or were otherwise not recordable on the above-mentioned documents, will be maintained in written record form. This will include first aid treatment of any kind.

All injury and illness documentation and records will be reviewed on a regular basis by the **Administrative Safety Coordinator** to analyze occurrences, identify developing trends, and plan courses of corrective actions.

11. SAFETY PROGRAM RECORDKEEPING

The **Administrative Safety Coordinator** will be responsible for maintaining all documentation of training, accident reports, OSHA logs, hazard reports, incident reports and any other documentation incidental to the implementation of this accident prevention plan. Records of all

HAZCOM training (if applicable) will be maintained as part of the Hazard Communication program.

Blank forms for all safety related training and documentation will be available from the **Administrative Safety Coordinator.**

12. INJURY RECORDS

An injury log will be maintained in the corporate office located at **1205 Sheldon Cove, Suite 1-K, Austin TX 78753**. Injuries will be recorded on an OSHA 300 form or equivalent within 24 hours of being reported.

The summary portion of the OSHA 300 form will be posted from February 1st to May 1st each year in a place where employee notices are normally placed.

Injury records will be retained for a period of five (5) calendar years.

13. INSPECTION REPORTS

Documentation will include: (1) Date of inspection, (2) Name of inspector, (3) Discrepancies found, (4) Person responsible for corrections, and (5) Estimated date of correction.

Reports will be filed in a letter to the client and or facilities manager and maintained until all discrepancies are corrected or at least 12 months, whichever is longer.

14. SAFETY MEETINGS/TRAINING

ATX Environmental Solutions, LLC requires that all personnel who work onsite complete the **OSHA 10 Hour Safety Course**, in addition to completing _____ required Safety Protocol. ATX Environmental Solutions, LLC is responsible for the registration and payment for these courses; however, it is the responsibility of the employee to follow the safety guidelines and procedures outlined therein.

Additionally, all Supervisors of ATX Environmental Solutions, LLC are required to complete the **OSHA 30 Hour Safety Course** within 30 days of hire. OSHA Safety courses of a higher stature (i.e. OSHA 510 or 500) will also be accepted.

Specialized training such as forklift, crane, HAZCOM, etc., will be provided and documented before employees are required to perform tasks involving these exposures.

Reports will be filed in a log and maintained for a period of 24 months or as required by law or directives.

15. ACCIDENT INVESTIGATION REPORTS

A written accident report will be filed in the office of the **Administrative Safety Coordinator** where it will be available for review. The investigation will be documented on the company form (Supervisor's Accident Investigation Report). The report will be retained for a period of 24 months or as required by law or directives.

16. ACCIDENT PREVENTION PLAN HEALTH AND SAFETY TRAINING

Employees of ATX Environmental Solutions, LLC will attend regular safety meetings, which will be conducted by the Supervisor, Supervisor's designee and/or Administrative Safety Coordinator.

Safety and training meetings will be documented and records will be maintained by the onsite supervisor and/or Administrative Safety Coordinator.

Hazard communication training will be given to all new employees before being allowed to work with hazardous materials. Refresher training will be given as needed when new hazardous material is introduced into the work place. MSDS's are included in the company hazard communication program and are available to all employees.

17. SAFETY PLANNING & PERMITTING

Pre-Task Safety Plan (PTP) – Prior to beginning work, a pre-task safety plan must be conducted by all foreman, supervisors and crew who will be performing the work. The purpose of the PTP is to identify all potential hazards and create a plan to reduce/eliminate these hazards. The PTP will be reviewed and implemented by all crew performing work and all who may be affected by the work to be performed. If the work conditions and/or hazards change at any point while performing the work, the work will be stopped and a new PTP created. All PTPs must be signed by the impacted workers prior to starting work, and be posted in the immediate work area.

Restricted Work Permit (RWP) – A Restricted Work Permit (RWP) is required for any work that occurs in or creates a potentially hazardous environment. Such work includes but is not limited to confined space, work in a restricted area, hot work (open flame or spark-producing), or work around fire/life safety systems and associated components. RWPs must be submitted at least 24 hours in advance of performing work, and include all applicable PTPs and any other specific work permits (such as pre and post confined space entry permits). All applicable training documentation must also be turned in with the RWP. For work performed at _____, ATX will comply with all applicable policies and procedures for RWPs as set forth in the _____'s handbooks.

18. SAFETY INSPECTION POLICY

The **Administrative Safety Coordinator, along with the onsite supervisor,** will be responsible for conducting and documenting safety inspections within the facility. Records of these inspections will be kept by the location site. Employees are responsible for inspecting their workstations for possible hazards. Hazards will be reported in writing to the **onsite supervisor and/or Administrative Safety Coordinator**. The **onsite supervisor and/or the Administrative Safety Coordinator** will recommend corrective actions to be taken. Hand and power tools will be inspected daily to identify any hazardous conditions prior to beginning work.

The **onsite Supervisor and/or Supervisor's designee** will be responsible for conducting daily and weekly inspections of the workplace and correcting any identified hazards.

19. ACCIDENT INVESTIGATION PROCEDURES

l. Investigations are required on all accidents including those "near misses" not producing injuries. Near misses will be documented on an incident report and forwarded to ATX Environmental Solutions, LLC Workers' Compensation Claims Group for review. Near misses are reviewed to determine if a recurring hazard exists, therefore, they must be thoroughly investigated and reported. Accidents that do not produce injury have probably produced other job hindrances, such as delays, damaged material, damaged equipment, etc.

2. All accidents are to be investigated by the supervisor or leader of the employee involved. Investigations will be conducted as soon as possible but no later than 24 hours after the accident.

3. The First Report of Injury and Supervisor Accident Investigation reports will be forwarded to ATX Environmental Solutions, LLC's Workers' Compensation division.
All incident reports, hazard reports, accident investigation reports and inspection checklists will be reviewed by company management to determine if trends are occurring.

4. These are the simple steps involved in producing a thorough and effective investigation:

- Understand the need for the investigation.
- Prepare for the investigation.
- Gather facts about the investigation (who, what, where, why, when, how).
- Take pictures, draw diagrams, get witness statements, (don't rely on memory, accident scenes change).
- Analyze the facts.
- Develop conclusions.
- Analyze conclusions.
- Make a report. Be very detailed and don't leave out simple facts.
- Correct the situation(s) or recommend corrective actions, depending on your authority.
- Follow through on recommendations.
- Double check the corrective action(s).
- Critique the investigation (assist management in reviewing the investigation report).

5. Each person in the review process is responsible for assuring thorough investigations and following up on corrective action to make sure it is effective.

20. ACCIDENT INVESTIGATION GUIDELINES

An accident can be defined as any occurrence that interrupts or interferes with the orderly progress of the job and usually occurs suddenly and unexpectedly. Some accidents involve human injury.

Accidents arise from a combination of unsafe acts and unsafe conditions.

The intent of an accident investigation should be to determine what basic condition or act caused the accident so corrective measures can be taken to prevent reoccurrence and not to identify the guilty party.

The person supervising the employee involved will conduct a comprehensive investigation. Supervisors are responsible for getting the most efficient use out of the equipment, material and people. They are also who management looks to solve operational problems such as unsafe acts or conditions.

An accident should be investigated as soon as possible and at least within the first 24 hours of the occurrence. The sooner the information is gathered, the more accurate the facts will be.
The accident investigation should include the following:

- Interview the employee involved (when possible) to evaluate the situation and potential liability.
- Photograph the scene (if possible). Don't rely on memory.
- Locate, interview and get statements from any witnesses.
- Evaluate any evidence found at the scene and reconstruct events.
- Have involved employees step through the sequence of events
- Do not disturb the accident scene until you are satisfied with the investigation.
- Before leaving the scene, warn, protect and/or repair any exposure areas.
- Involved employee should complete a written report before leaving for the day.
    - Be sure the report is in sufficient detail.
- Re-interview the involved employee if necessary.
- Complete all documentation of the event.

21. DISCIPLINARY POLICY

1. Employee safety is a major concern here at **ATX Environmental Solutions, LLC**. This company's personnel will adhere to company and client safety rules and regulations as a condition of employment. Any individual employee that has shown continued disregard for either safety or attendance standards shall be subject to appropriate disciplinary action. Such disciplinary action may be up to and including termination of employment. Such termination of employment shall be deemed to be "for cause" and will disqualify the employee from any job incentives the management may enact or reward.

2. General safety guidelines (rules and regulations) have been established and implemented by **ATX Environmental Solutions, LLC** and our appointed safety contacts. This company has no desire to discipline any employee. However, we intend to use every means to insure a safe work place, and all employees are expected to fulfill their responsibility in meeting this goal. The **responsibility and accountability** of enforcing disciplinary actions belong to the safety department and line supervisors. The line supervisors are held under the same level of discipline for failure to identify, correct, and discipline unsafe acts and unsafe conditions.

3. These guidelines are intended to promote a safe and efficient work environment at **ATX Environmental Solutions, LLC**; and are 100% approved and supported by upper management and officers.

4. All employees are required to comply with these general safety guidelines.

5. A safety violations log is established and implemented for the purpose of recording and tracking all employee violations of **ATX Environmental Solutions, LLC** general safety guidelines.

6. Where appropriate, the following action will be taken in response to safety violations:

(i) First Offense/Violation – Violator will be issued a written warning
(ii) Second Offense/Violation – Violator will be suspended for three (3) days without pay
(iii) Third Offense/Violation – Violator will be terminated from employment

Not withstanding this progressive disciplinary policy, the company reserves the right to administer discipline in such a manner as it deems appropriate to the circumstances, and may in its sole discretion, eliminate any or all of the steps in the disciplinary process.

7. Each official safety violation will be documented on the applicable form. The completed form will be forwarded to the designated safety coordinator for use (as necessary) in violation review and investigation, and violator counseling/retraining. An employee's safety record will be utilized as an important part of his/her performance evaluation.

8. Upon violation of any company safety rule, the violating employee will be disciplined. The severity of the penalty will be in direct correlation to the severity of the safety violation.

22. GENERAL SAFETY & HEALTH PROVISIONS

It shall be the responsibility of ATX Environmental Solutions, LLC to initiate and maintain such programs as may be necessary to comply with PART 1926 of OSHA Regulations (Standards – 29 CFR).

This program shall provide for frequent and regular inspections of the job sites, materials, and equipment to be made by competent persons designated by ATX Environmental Solutions, LLC.

The use of any machinery, tool, material, or equipment which is not in compliance with any applicable requirement of PART 1926 is prohibited. Such machine, tool, material, or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

ATX Environmental Solutions, LLC shall permit only those employees qualified by training or experience to operate equipment and machinery.

Standards in PART 1926 requires ATX Environmental Solutions, LLC to provide personal protective equipment (PPE), including respirators and other types of PPE, because of hazards to employees impose a separate compliance duty with respect to each employee covered by the requirement. ATX Environmental Solutions, LLC must provide PPE to each employee required to use the PPE, and each failure to provide PPE to an employee may be considered a separate violation.

Standards in PART 1926 require ATX Environmental Solutions, LLC to train each employee in the manner required by the standard, and each failure to train an employee may be considered a separate violation.

To comply with PART 1926, ATX Environmental Solutions, LLC has initiated and implemented Section 12 of this Safety Program.

23. FALL PROTECTION

The purpose of this plan is: (a) To supplement our standard safety policy by providing safety standards specifically designed to cover fall protection and; (b) to ensure that each employee is trained and made aware of the safety provisions which are to be implemented by this plan prior to the start of erection.

This Fall Protection Plan addresses the use of other than conventional fall protection at a number of areas on the project, as well as identifying specific activities that require non-conventional means of fall protection.

This plan is designed to enable ATX Environmental Solutions, LLC and our employees to recognize the fall hazards on this job and to establish the procedures that are to be followed in order to prevent falls to lower levels or through holes and openings in walking/working surfaces.

Each employee will be trained in these procedures and strictly adhere to them except when doing so would expose the employee to a greater hazard. If, in the employee's opinion, this is the case, the employee is to notify the supervisor of the concern and the concern addressed before proceeding.

It is the responsibility of the Administrative Safety Coordinator and the Supervisors to implement this Fall Protection Plan. The Supervisors are responsible for continual observational safety checks of their work operations and to enforce the safety policy and procedures. The supervisors are also responsible to correct any unsafe acts or conditions immediately. It is the responsibility of the employee to understand and adhere to the procedures of this plan and to follow the instructions of the supervisors. It is also the responsibility of the employee to bring to the supervisor's attention any unsafe or hazardous conditions or acts that may cause injury to either themselves or any other employees.

All employees that will be working in areas subject to fall hazards shall have been trained and instructed in the following areas:

1. Recognition of the fall hazards in the work area (at the leading edge and when making initial connections-point of erection).
2. Avoidance of fall hazards using established work practices which have been made known to the employees.
3. Recognition of unsafe practices or working conditions that could lead to a fall, such as windy conditions.
4. The function, use, and operation of safety monitoring systems, guardrail systems, body belt/harness systems, control zones and other protection to be used.
5. The correct procedure for erecting, maintaining, disassembling and inspecting the system(s) to be used.
6. Knowledge of construction sequence or the erection plan.

All employees who will be working in areas subject to fall hazards shall be responsible for recognizing and warning employees of fall hazards. These duties include:

1. Warn by voice when approaching the open edge in an unsafe manner.
2. Warn by voice if there is a dangerous situation developing which cannot be seen by another person involved with product placement, such as a member getting out of control.
3. Make employees aware they are in a dangerous area.
4. Be competent in recognizing fall hazards.
5. Warn employees when they appear to be unaware of a fall hazard or are acting in an unsafe manner.
6. Be on the same walking/working surface as the monitored employee and within visual sighting distance of the monitored employee.
7. Be close enough to communicate orally with the employees.
8. Not allow other responsibilities to encumber monitoring employee.

The safety monitoring system shall not be used when the wind is strong enough to cause loads with large surface areas to swing out of radius, or result in loss of control of the load, or when weather conditions cause the walking-working surfaces to become icy or slippery.

All areas subject to fall hazards are to be clearly marked to protect the employees in the area. The process for clearly marking these areas is subject to job site requirements and preferences. Employees and supervisors will be made aware of these requirements prior to beginning work on the area, and it is the responsibility of the supervisors to ensure compliance with clearly marking the area subject to fall hazards.

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

In the event that an employee falls or there is some other related, serious incident occurring, this plan shall be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar types of falls or incidents from occurring.

24. ELECTRICAL SAFETY

Extension cords used with portable electrical tools and appliances shall be of a three-wire type. Only round cords are used as the flat cords are no longer considered in compliance with the NEC code. Extension cords should be of at least hard usage grade when in use on the jobsite.
A ground fault circuit interrupter (GFCI) shall be used whenever construction equipment is plugged into a receptacle. The GFCI shall be used at the power source when in use. In order to comply with regulation, all extension or equipment power cord splices, repairs, or cap replacements shall have insulation equal to the rest of the cable. Electrical and extension cords should not run through doorways, windows, or similar openings, over sharp edges, or in such a way as to require the cord to bend sharply. Cords passing through any hole or over potentially sharp edges shall be protected by bushings or fittings to prevent damage to the insulation. Extension and power cords shall be connected to outlets, devices, or fittings in such a way to avoid strain and pull from directly transmitting to joints or terminal screws.

All employees of ATX Environmental Solutions will only use tools with three-wire plugs and make sure connections are tight they should never cut off the third prong (Ground) to fit an older, two-hole outlet or use a two-wire extension cord with a three-prong plug. All employees are required to check tools, equipment, and cables frequently for safe condition. Any defective tool shall be reported to your supervisor so it can be tagged and removed from service for repair. Employees will disconnect tools from power source before making repairs, adjustments, or replacing blades or bits. When using power tools in a wet area, employees will use caution as the shock hazard increases in these conditions.

Before using any outlet, employees should make a safety check for loose cable connections, bare wires, cracked outlets or damaged faceplates. They need to be sure the plug fits firmly and check for any signs of heating caused by faulty connections. To remove a cord, grip it at the plug; Yanking a cord can break cord insulation and wires, pull wire connections loose, bend plug prongs, and spread the clips inside the outlet.

All circuits and equipment, including electrical and mechanical apparatuses, are classified either as "dead or alive." All circuits and equipment shall be considered "alive" at all times unless fully protected in accordance with the Lock Out/Tag out procedure. Workers shall not stand on or otherwise make contact with transformer cases, or other similar equipment, while working on energized wires or equipment.

25. PERSONAL PROTECTIVE & LIFE SAVING EQUIPMENT

In accordance to PART 1910.132 of OSHA Regulations (Standards – 29 CFR), protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory 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 manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

All personal protective equipment shall be of safe design and construction for the work to be performed.

ATX Environmental Solutions, LLC 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, ATX Environmental Solutions, LLC 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; communicate selection decisions to each affected employee; and, select PPE that properly fits each affected employee.

ATX Environmental Solutions, LLC 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.

Defective or damaged personal protective equipment shall **not** be used.

ATX Environmental Solutions, LLC shall provide training to each employee who is required by this section to use PPE. Each such employee shall be trained to know at when PPE is necessary; what PPE is necessary; how to properly don, doff, adjust, and wear PPE; the limitations of the

PPE; and, the proper care, maintenance, useful life and disposal of the PPE. Each affected employee shall demonstrate an understanding of the training specified in paragraph (f)(1) of this section, and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

When ATX Environmental Solutions, LLC has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph (f)(2) of this section, ATX Environmental Solutions, LLC shall retrain each such employee. Circumstances where retraining is required include, but are not limited to, situations where changes in the workplace render previous training obsolete; or changes in the types of PPE to be used render previous training obsolete; or inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.

ATX Environmental Solutions, LLC 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.

26. HAZARD COMMUNICATION & EMPLOYEE TRAINING

In order to comply with 29 CFR 1910.1200, the following written **Hazard Communication Program (HCP)** is implemented for personnel of ATX Environmental Solutions, LLC. The original copies will be kept on file by ATX Environmental Solutions, LLC at 1205 Sheldon Cove, Suite 1-K, Austin TX 78753. The purpose of the program is to establish uniform rules and regulations throughout the company to educate all employees in the safe handling of hazardous chemicals in their work area and to educate them on any inherent dangers these chemicals may possess. This program must be available to all employees upon hiring and a copy will be supplied to any employee upon request.
The program will be updated when new chemicals or hazards are introduced into the working environment and reviewed annually.

The **Administrative Safety Coordinator, along with Supervisors** will assure all chemical purchase requests have Material Safety Data Sheets (MSDS) requested prior to processing. All chemicals in use must have a Material Safety Data Sheet available.

It is the policy of ATX Environmental Solutions, LLC to provide a safe and healthful working place for all employees. The company has recognized the duty to take every reasonable effort to remove chemical hazards from the work place, and when this is not possible, to make every operation involving a hazardous chemical as risk free as possible. In this regard, every employee whose job involves handling hazardous chemicals will be thoroughly informed of the chemical hazards and trained to perform his/her job in a safe manner.

It is the responsibility of each supervisor to be aware of the provisions of the **OSHA Hazard Communication Standard** as well as to seek reasonable alternatives to the use of hazardous chemicals in their work area. It is the responsibility of each supervisor to implement this policy

and insure compliance in all areas. Managers and supervisors will accept the administration and enforcement of this program as an operational responsibility.

It is the responsibility and duty of each employee to comply with the safety and health standards promulgated under this program and the applicable rules and regulations.

A. Container Labeling

The **Supervisor or Supervisor's designee** will be responsible for all containers of hazardous chemicals entering the work place and will assure that the chemical containers are properly labeled with:

- Chemical name
- Hazard Warnings
- Name and address of the manufacturer, importer, or responsible party

No containers shall be used until they have been checked by the Supervisor or Supervisor's designee. If the chemical is to be transferred to a separate container, the **Supervisor or Supervisor's designee** will ensure that the new container is properly labeled with an extra copy of the manufacturer's label or with a generic label which has a block for identity and blocks for the hazard warning. Each container will be labeled, tagged, or marked with the identity of hazardous chemicals contained, and must show hazard warnings appropriate for employee protection. The label must be cross-referenced with the Material Safety Data Sheet. The hazard warning can be in the form of words, pictures, or symbols, which convey the hazards of the chemical(s) in the container.

The **Administrative Safety Coordinator and Supervisors** are responsible for reviewing the labeling system annually and updating as required.

All employees will be trained in reading and interpreting the container, transfer pipes, and hose labels.

B. Material Safety Data Sheets (MSDS)

The **Supervisor or Supervisor's designee** will be responsible for obtaining and maintaining the MSDS system for this company. The **Supervisor or Supervisor's designee** will review all incoming data sheets for new and significant health/safety information and will insure new information is given to the affected employees. Copies of the MSDS will be kept by the **Supervisor or Supervisor's designee and/or Administrative Safety Coordinator** and reviewed annually for accuracy of the MSDS as part of the annual **HCP** annual review process.

THE MATERIAL SAFETY DATA SYSTEM SHALL INCLUDE:

- The current Master Inventory List of all MSDS indexed by number to the MSDS referenced on the inventory list.

- The identity used on the MSDS shall be the same as used on the container label.
- The Chemical or Common Name of all ingredients determined to present a hazard shall appear on all MSDS.

THE MSDS SHALL LIST:

- The physical and chemical characteristics of the chemical, including vapor pressure, flash point, etc.
- The fire, explosion, and reactivity hazards of the chemical mixture including the boiling
- point, flash point, and auto-ignition temperature.
- Health hazards of the chemical mixture, including signs and symptoms of exposure, and medical conditions recognized as aggravated by exposure with primary routes of entry permissible exposure limits (PEL) or any other exposure limit used or recommended by the manufacturer, importer or employer.
- Whether it is on carcinogen listing (NTP) or has been found to be a potential carcinogen (IARC listing) by OSHA.
- Control measures, including fire, engineering, personal protective equipment.
- General precautions for safe handling and use including protective measures during
- repair and maintenance and procedures for clean up of spills and leaks.
- Emergency and first aid procedures.
- Date prepared or changed.
- Name, address, telephone numbers of manufacturer, importer, or responsible party to call in an emergency.

The originals of the MSDS will be kept on file by the **Administrative Safety Coordinator and/or Supervisor**. The MSDS will also be part of the **HCP** for use by the employees. All MSDS will be maintained in a Chemical MSDS Inventory Notebook and will be cross referenced to the chemical inventory list contained as part of this program and to the labels on the hazardous chemical container, piping or hose.

No new chemicals shall be used until the MSDS has been obtained, reviewed by the **Supervisor or Supervisor's designee**, and appropriate employee training provided.

C. HCP Employee Training

Before starting work, the respective supervisor of a new employee will go over their copy of the **Hazard Communication Program (HCP)** and each MSDS applicable to the new employee's job. Before any new chemical is used, all employees will be informed of its use, will be instructed on safe use, and will be trained on hazards associated with the new chemical. All employees will attend additional training, as appropriate, to review the HCP and MSDS.

BASIC ORIENTATION AND TRAINING FOR NEW EMPLOYEES:

- An overview of the requirements contained in the **Hazard Communication Standard, 29 CFR 1910.1200**.

- Chemicals present in their work place.
- Location and availability of the HCP.
- Physical and health effects of the hazardous chemicals listed on the chemical inventory lists.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work place.
- How to lessen or prevent exposure to these hazardous chemicals through use of control/work practices and personal protective equipment.
- Steps taken by ATX Environmental Solutions, LLC to lessen or prevent exposure to chemicals listed on the inventory list.
- Emergency procedures to follow if exposed to any of the chemicals.
- Location of the MSDS file and hazardous chemical inventory list.

Prior to a new chemical hazard being introduced into any section of the work place, each employee will be given information and training as outlined above. The **Administrative Safety Coordinator and Supervisors** are responsible for ensuring all new chemicals have an MSDS available and have been reviewed through training of employees, if necessary, prior to its introduction in the work place.

After attending the training class, each employee will sign a form to verify that they have attended the training, that the written HCP was made available for review and that they understand the HCP.

D. HCP Non-Routine Tasks

Before any non-routine task is performed, employees shall be advised and/or they must contact their supervisor for special precautions to follow and the supervisor shall inform any other personnel who could be exposed. At the time non-routine tasks are required, the supervisor, will provide the following information about such activity as it relates to the specific chemicals expected to be encountered:

- Specific chemical name and hazard.
- Protective personal equipment required and safety measures to be taken.
- Measures that have been taken to lessen the hazards including ventilation, respirators, presence of other employees and emergency procedures.

27. MATERIALS HANDLING, STORAGE, USE & DISPOSAL

In accordance to PART 1926.250 of OSHA Regulations (Standards – 29 CFR), the following procedures will be followed in regards to materials handling, storage, use and disposal:

- All materials stored in tiers shall be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling or collapse.

- Maximum safe load limits of floors within buildings and structures, in pounds per square foot, shall be conspicuously posted in all storage areas, except for floor or slab on grade. Maximum safe loads shall not be exceeded.
- Aisles and passageways shall be kept clear to provide for the free and safe movement of material handling equipment or employees. Such areas shall be kept in good repair.
- When a difference in road or working levels exist, means such as ramps, blocking, or grading shall be used to ensure the safe movement of vehicles between the two levels.
- Each employee required to work on stored material in silos, hoppers, tanks, and similar storage areas shall be equipped with personal fall arrest equipment meeting the requirements of Section 20 of this Safety Program.
- Materials shall not be stored on scaffolds or runways in excess of supplies needed for immediate operations. All scaffolds are to be inspected prior to use by a competent person, and documentation of this inspection will be maintained. All persons using or spotting use of the scaffold will have proper training prior to use.
- Structural steel, poles, pipe, bar stock, and other cylindrical materials, unless racked, shall be stacked and blocked so as to prevent spreading or tilting.
- Storage areas shall be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or pest harborage.
- Portable and powered dockboards shall be strong enough to carry the load imposed on them.
- Portable dockboards shall be secured in position, either by being anchored or equipped with devices which will prevent their slipping.
- Handholds, or other effective means, shall be provided on portable dockboards to permit safe handling.

28. TOOLS: HAND & POWER

In accordance to PART 1926.300 of OSHA Regulations (Standards – 29 CFR), all hand and power tools and similar equipment, whether furnished by ATX Environmental Solutions, LLC or the employee, shall be maintained in a safe condition. All Hand and Power tools are subject to the following regulations:

- GUARDING:
    - When power operated tools are designed to accommodate guards, they shall be equipped with such guards when in use.
    - Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating or moving parts of equipment shall be guarded if such parts are exposed to contact by employees or otherwise create a hazard. Guarding shall meet the requirements as set forth in American National Standards Institute, B15.1-1953 (R1958), Safety Code for Mechanical Power-Transmission Apparatus.
    - One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and

sparks. Examples of guarding methods are - barrier guards, two-hand tripping devices, electronic safety devices, etc.
    - The point of operation of machines whose operation exposes an employee to injury, shall be guarded. The guarding device shall be in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle.
    - Special handtools for placing and removing material shall be such as to permit easy handling of material without the operator placing a hand in the danger zone. Such tools shall not be in lieu of other guarding required by this section, but can only be used to supplement protection provided.
    - Safety guards where the operator stands in front of the opening, shall be constructed so that the peripheral protecting member can be adjusted to the constantly decreasing diameter of the wheel.

Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases shall be provided with the particular personal protective equipment necessary to protect them from the hazard. All personal protective equipment shall meet the requirements and be maintained according to section 21 of this Safety Program.

- SWITCHES:
    - All hand-held powered platen sanders, grinders with wheels 2-inch diameter or less, routers, planers, laminate trimmers, nibblers, shears, scroll saws, and jigsaws with blade shanks one-fourth of an inch wide or less may be equipped with only a positive "on-off" control.
    - All hand-held powered drills, tappers, fastener drivers, horizontal, vertical, and angle grinders with wheels greater than 2 inches in diameter, disc sanders, belt sanders, reciprocating saws, saber saws, and other similar operating powered tools shall be equipped with a momentary contact "on-off" control and may have a lock-on control provided that turnoff can be accomplished by a single motion of the same finger or fingers that turn it on.
    - All other hand-held powered tools, such as circular saws, chain saws, and percussion tools without positive accessory holding means, shall be equipped with a constant pressure switch that will shut off the power when the pressure is released.
    - Exception: This paragraph does not apply to concrete vibrators, concrete breakers, powered tampers, jack hammers, rock drills, and similar hand operated power tools.
- Employers shall not issue or permit the use of unsafe hand tools. Wrenches, including adjustable, pipe, end, and socket wrenches shall not be used when jaws are sprung to the point that slippage occurs. Impact tools, such as drift pins, wedges, and chisels, shall be kept free of mushroomed heads. The wooden handles of tools shall be kept free of splinters or cracks and shall be kept tight in the tool.

- Electric power operated tools shall either be of the approved double-insulated type or grounded. The use of electric cords for hoisting or lowering tools shall not be permitted.
- Pneumatic power tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.
- Safety clips or retainers shall be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled.
- All pneumatically driven nailers, staplers, and other similar equipment provided with automatic fastener feed, which operate at more than 100 p.s.i. pressure at the tool shall have a safety device on the muzzle to prevent the tool from ejecting fasteners, unless the muzzle is in contact with the work surface.
- Compressed air shall not be used for cleaning purposes except where reduced to less than 30 p.s.i. and then only with effective chip guarding and personal protective equipment. The 30 p.s.i. requirement does not apply for concrete form, mill scale and similar cleaning purposes.
- The manufacturer's safe operating pressure for hoses, pipes, valves, filters, and other fittings shall not be exceeded. The use of hoses for hoisting or lowering tools shall not be permitted. All hoses exceeding 1/2-inch inside diameter shall have a safety device at the source of supply or branch line to reduce pressure in case of hose failure.
- Airless spray guns of the type which atomize paints and fluids at high pressures (1,000 pounds or more per square inch) shall be equipped with automatic or visible manual safety devices which will prevent pulling of the trigger to prevent release of the paint or fluid until the safety device is manually released. Or, a diffuser nut which will prevent high pressure, high velocity release, while the nozzle tip is removed, plus a nozzle tip guard which will prevent the tip from coming into contact with the operator, or other equivalent protection, shall be provided. The blast cleaning nozzles shall be equipped with an operating valve which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.
- All fuel powered tools shall be stopped while being refueled, serviced, or maintained, and fuel shall be transported, handled, and stored in accordance with section 24 of this Safety Program. When fuel powered tools are used in enclosed spaces, the applicable requirements for concentrations of toxic gases and use of personal protective equipment shall apply.
- The fluid used in hydraulic powered tools shall be fire-resistant fluids approved under Schedule 30 of the U.S. Bureau of Mines, Department of the Interior, and shall retain its operating characteristics at the most extreme temperatures to which it will be exposed. The manufacturer's safe operating pressures for hoses, valves, pipes, filters, and other fittings shall not be exceeded.
- Only employees who have been trained in the operation of the particular tool in use shall be allowed to operate a powder-actuated tool. The tool shall be tested each day before loading to see that safety devices are in proper working condition. The method of testing shall be in accordance with the manufacturer's recommended procedure. Any tool found not in proper working order, or that develops a defect during use, shall be immediately removed from service and not used until properly repaired.

- Personal protective equipment shall be in accordance with section 21 of this Safety Program.
- Tools shall not be loaded until just prior to the intended firing time. Neither loaded nor empty tools are to be pointed at any employees. Hands shall be kept clear of the open barrel end.
- Loaded tools shall not be left unattended.
- Fasteners shall not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface-hardened steel, glass block, live rock, face brick, or hollow tile.
- Driving into materials easily penetrated shall be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.
- No fastener shall be driven into a spalled area caused by an unsatisfactory fastening.
- Tools shall not be used in an explosive or flammable atmosphere.
- All tools shall be used with the correct shield, guard, or attachment recommended by the manufacturer.
- Powder-actuated tools used by employees shall meet all other applicable requirements of American National Standards Institute, A10.3-1970, Safety Requirements for Explosive-Actuated Fastening Tools

29. TOOLS: WELDING & CUTTING

In accordance to PART 1926.350 of OSHA Regulations (Standards – 29 CFR), all welding and cutting tools and similar equipment, whether furnished by ATX Environmental Solutions, LLC or the employee, shall be maintained in a safe condition. All welding and cutting tools are subject to the following regulations:

While transporting, moving, and storing compressed gas cylinders, valve protection caps shall be in place and secured. When cylinders are hoisted, they shall be secured on a cradle, slingboard, or pallet. They shall not be hoisted or transported by means of magnets or choker slings. Cylinders shall be moved by tilting and rolling them on their bottom edges. They shall not be intentionally dropped, struck, or permitted to strike each other violently. When cylinders are transported by powered vehicles, they shall be secured in a vertical position. Valve protection caps shall not be used for lifting cylinders from one vertical position to another. Bars shall not be used under valves or valve protection caps to pry cylinders loose when frozen. Warm, not boiling, water shall be used to thaw cylinders loose. Unless cylinders are firmly secured on a special carrier intended for this purpose, regulators shall be removed and valve protection caps put in place before cylinders are moved. A suitable cylinder truck, chain, or other steadying

device shall be used to keep cylinders from being knocked over while in use. When work is finished, when cylinders are empty, or when cylinders are moved at any time, the cylinder valve shall be closed. Compressed gas cylinders shall be secured in an upright position at all times except, if necessary, for short periods of time while cylinders are actually being hoisted or carried.

Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet (6.1 m) or by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one-half hour.

Inside of buildings, cylinders shall be stored in a well-protected, well-ventilated, dry location, at least 20 feet (6.1 m) from highly combustible materials such as oil or excelsior. Cylinders should be stored in definitely assigned places away from elevators, stairs, or gangways. Assigned storage places shall be located where cylinders will not be knocked over or damaged by passing or falling objects, or subject to tampering by unauthorized persons. Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards.

The in-plant handling, storage, and utilization of all compressed gases in cylinders, portable tanks, rail tankcars, or motor vehicle cargo tanks shall be in accordance with Compressed Gas Association Pamphlet P-1-1965.

Cylinders shall be kept far enough away from the actual welding or cutting operation so that sparks, hot slag, or flame will not reach them. When this is impractical, fire resistant shields shall be provided. Cylinders shall be placed where they cannot become part of an electrical circuit. Electrodes shall not be struck against a cylinder to strike an arc. Fuel gas cylinders shall be placed with valve end up whenever they are in use. They shall not be placed in a location where they would be subject to open flame, hot metal, or other sources of artificial heat. Cylinders containing oxygen or acetylene or other fuel gas shall not be taken into confined spaces.

Cylinders, whether full or empty, shall not be used as rollers or supports.

No person other than the gas supplier shall attempt to mix gases in a cylinder. No one except the owner of the cylinder or person authorized by him, shall refill a cylinder. No one shall use a cylinder's contents for purposes other than those intended by the supplier. All cylinders used shall meet the Department of Transportation requirements published in 49 CFR Part 178, Subpart C, Specification for Cylinders.

No damaged or defective cylinder shall be used.

ATX Environmental Solutions, LLC shall thoroughly instruct employees in the safe use of fuel gas, as follows:

- Before a regulator to a cylinder valve is connected, the valve shall be opened slightly and closed immediately. (This action is generally termed "cracking" and is intended to clear the valve of dust or dirt that might otherwise enter the regulator.) The person cracking the

valve shall stand to one side of the outlet, not in front of it. The valve of a fuel gas cylinder shall not be cracked where the gas would reach welding work, sparks, flame, or other possible sources of ignition.

- The cylinder valve shall always be opened slowly to prevent damage to the regulator. For quick closing, valves on fuel gas cylinders shall not be opened more than 1 1/2 turns. When a special wrench is required, it shall be left in position on the stem of the valve while the cylinder is in use so that the fuel gas flow can be shut off quickly in case of an emergency. In the case of manifolded or coupled cylinders, at least one such wrench shall always be available for immediate use. Nothing shall be placed on top of a fuel gas cylinder, when in use, which may damage the safety device or interfere with the quick closing of the valve.
- Fuel gas shall not be used from cylinders through torches or other devices which are equipped with shutoff valves without reducing the pressure through a suitable regulator attached to the cylinder valve or manifold.
- Before a regulator is removed from a cylinder valve, the cylinder valve shall always be closed and the gas released from the regulator.
- If, when the valve on a fuel gas cylinder is opened, there is found to be a leak around the valve stem, the valve shall be closed and the gland nut tightened. If this action does not stop the leak, the use of the cylinder shall be discontinued, and it shall be properly tagged and removed from the work area. In the event that fuel gas should leak from the cylinder valve, rather than from the valve stem, and the gas cannot be shut off, the cylinder shall be properly tagged and removed from the work area. If a regulator attached to a cylinder valve will effectively stop a leak through the valve seat, the cylinder need not be removed from the work area.
- If a leak should develop at a fuse plug or other safety device, the cylinder shall be removed from the work area.

Fuel gas and oxygen manifolds shall bear the name of the substance they contain in letters at least 1-inch high which shall be either painted on the manifold or on a sign permanently attached to it. Fuel gas and oxygen manifolds shall be placed in safe, well ventilated, and accessible locations. They shall not be located within enclosed spaces. Manifold hose connections, including both ends of the supply hose that lead to the manifold, shall be such that the hose cannot be interchanged between fuel gas and oxygen manifolds and supply header connections. Adapters shall not be used to permit the interchange of hose. Hose connections shall be kept free of grease and oil. When not in use, manifold and header hose connections shall be capped. Nothing shall be placed on top of a manifold, when in use, which will damage the manifold or interfere with the quick closing of the valves.

Fuel gas hose and oxygen hose shall be easily distinguishable from each other. The contrast may be made by different colors or by surface characteristics readily distinguishable by the sense of touch. Oxygen and fuel gas hoses shall not be interchangeable. A single hose having more than one gas passage shall not be used. When parallel sections of oxygen and fuel gas hose are taped together, not more than 4 inches out of 12 inches shall be covered by tape. All hose in use, carrying acetylene, oxygen, natural or manufactured fuel gas, or any gas or substance which may ignite or enter into combustion, or be in any way harmful to employees, shall be inspected at the

beginning of each working shift. Defective hose shall be removed from service. Hose which has been subject to flashback, or which shows evidence of severe wear or damage, shall be tested to twice the normal pressure to which it is subject, but in no case less than 300 p.s.i. Defective hose, or hose in doubtful condition, shall not be used. Hose couplings shall be of the type that cannot be unlocked or disconnected by means of a straight pull without rotary motion. Boxes used for the storage of gas hose shall be ventilated. Hoses, cables, and other equipment shall be kept clear of passageways, ladders and stairs.

Clogged torch tip openings shall be cleaned with suitable cleaning wires, drills, or other devices designed for such purpose. Torches in use shall be inspected at the beginning of each working shift for leaking shutoff valves, hose couplings, and tip connections. Defective torches shall not be used. Torches shall be lighted by friction lighters or other approved devices, and not by matches or from hot work.

Oxygen and fuel gas pressure regulators, including their related gauges, shall be in proper working order while in use.

Oxygen cylinders and fittings shall be kept away from oil or grease. Cylinders, cylinder caps and valves, couplings, regulators, hose, and apparatus shall be kept free from oil or greasy substances and shall not be handled with oily hands or gloves. Oxygen shall not be directed at oily surfaces, greasy clothes, or within a fuel oil or other storage tank or vessel.

When practical, objects to be welded, cut, or heated shall be moved to a designated safe location or, if the objects to be welded, cut, or heated cannot be readily moved, all movable fire hazards in the vicinity shall be taken to a safe place, or otherwise protected. If the object to be welded, cut, or heated cannot be moved and if all the fire hazards cannot be removed, positive means shall be taken to confine the heat, sparks, and slag, and to protect the immovable fire hazards from them. No welding, cutting, or heating shall be done where the application of flammable paints, or the presence of other flammable compounds, or heavy dust concentrations creates a hazard.

Suitable fire extinguishing equipment shall be immediately available in the work area and shall be maintained in a state of readiness for instant use.

When the welding, cutting, or heating operation is such that normal fire prevention precautions are not sufficient, additional personnel shall be assigned to guard against fire while the actual welding, cutting, or heating operation is being performed, and for a sufficient period of time after completion of the work to ensure that no possibility of fire exists. Such personnel shall be instructed as to the specific anticipated fire hazards and how the firefighting equipment provided is to be used.

When welding, cutting, or heating is performed on walls, floors, and ceilings, since direct penetration of sparks or heat transfer may introduce a fire hazard to an adjacent area, the same precautions shall be taken on the opposite side as are taken on the side on which the welding is being performed.

For the elimination of possible fire in enclosed spaces as a result of gas escaping through leaking or improperly closed torch valves, the gas supply to the torch shall be positively shut off at some point outside the enclosed space whenever the torch is not to be used or whenever the torch is left unattended for a substantial period of time, such as during the lunch period. Overnight and at the change of shifts, the torch and hose shall be removed from the confined space. Open end fuel gas and oxygen hoses shall be immediately removed from enclosed spaces when they are disconnected from the torch or other gas-consuming device.

Except when the contents are being removed or transferred, drums, pails, and other containers which contain or have contained flammable liquids shall be kept closed. Empty containers shall be removed to a safe area apart from hot work operations or open flames.

Drums containers, or hollow structures which have contained toxic or flammable substances shall, before welding, cutting, or heating is undertaken on them, either be filled with water or thoroughly cleaned of such substances and ventilated and tested. For welding, cutting and heating on steel pipelines containing natural gas, the pertinent portions of regulations issued by the Department of Transportation, Office of Pipeline Safety, 49 CFR Part 192, Minimum Federal Safety Standards for Gas Pipelines, shall apply.

Before heat is applied to a drum, container, or hollow structure, a vent or opening shall be provided for the release of any built-up pressure during the application of heat.

Mechanical ventilation shall meet the following requirements:

- Mechanical ventilation shall consist of either general mechanical ventilation systems or local exhaust systems.
- General mechanical ventilation shall be of sufficient capacity and so arranged as to produce the number of air changes necessary to maintain welding fumes and smoke within safe limits.
- Local exhaust ventilation shall consist of freely movable hoods intended to be placed by the welder or burner as close as practicable to the work. This system shall be of sufficient capacity and so arranged as to remove fumes and smoke at the source and keep the concentration of them in the breathing zone within safe limits.
- Contaminated air exhausted from a working space shall be discharged into the open air or otherwise clear of the source of intake air.
- All air replacing that withdrawn shall be clean and respirable.
- Oxygen shall not be used for ventilation purposes, comfort cooling, blowing dust from clothing, or for cleaning the work area.

When sufficient ventilation cannot be obtained without blocking the means of access, employees in the confined space shall be protected by air line respirators in accordance with the requirements of section 21 of this Safety Program, and an employee on the outside of such a confined space shall be assigned to maintain communication with those working within it and to aid them in an emergency.

Where a welder must enter a confined space through a manhole or other small opening, means shall be provided for quickly removing him in case of emergency. When safety belts and lifelines are used for this purpose they shall be so attached to the welder's body that his body cannot be jammed in a small exit opening. An attendant with a pre-planned rescue procedure shall be stationed outside to observe the welder at all times and be capable of putting rescue operations into effect.

Welding, cutting, or heating in any enclosed spaces involving the metals specified in this subparagraph shall be performed with either general mechanical or local exhaust ventilation meeting the requirements outlined above. Metals to which this paragraph applies: Zinc-bearing base or filler metals or metals coated with zinc-bearing materials; Lead base metals; Cadmium-bearing filler materials; Chromium-bearing metals or metals coated with chromium-bearing materials.

Welding, cutting, or heating in any enclosed spaces involving the metals specified in this subparagraph shall be performed with local exhaust ventilation in accordance with the requirements outlined above, or employees shall be protected by air line respirators in accordance with the requirements of section 21 of this Safety Program: Metals containing lead, other than as an impurity, or metals coated with lead-bearing materials; Cadmium-bearing or cadmium-coated base metals; Metals coated with mercury-bearing metals; Beryllium-containing base or filler metals. Because of its high toxicity, work involving beryllium shall be done with both local exhaust ventilation and air line respirators.

Employees performing such operations in the open air shall be protected by filter-type respirators in accordance with the requirements of section 21 of this Safety Program, except that employees performing such operations on beryllium-containing base or filler metals shall be protected by air line respirators in accordance with the requirements of section 21 of this Safety Program.

Other employees exposed to the same atmosphere as the welders or burners shall be protected in the same manner as the welder or burner.

Since the inert-gas metal-arc welding process involves the production of ultra-violet radiation of intensities of 5 to 30 times that produced during shielded metal-arc welding, the decomposition of chlorinated solvents by ultraviolet rays, and the liberation of toxic fumes and gases, employees shall not be permitted to engage in, or be exposed to the process until the following special precautions have been taken:

- The use of chlorinated solvents shall be kept at least 200 feet, unless shielded, from the exposed arc, and surfaces prepared with chlorinated solvents shall be thoroughly dry before welding is permitted on such surfaces.
- Employees in the area not protected from the arc by screening shall be protected by filter lenses meeting the requirements of Subpart E of this part. When two or more welders are exposed to each other's arc, filter lens goggles of a suitable type, meeting the requirements of Subpart E of this part, shall be worn under welding helmets. Hand

shields to protect the welder against flashes and radiant energy shall be used when either the helmet is lifted or the shield is removed.

- Welders and other employees who are exposed to radiation shall be suitably protected so that the skin is covered completely to prevent burns and other damage by ultraviolet rays. Welding helmets and hand shields shall be free of leaks and openings, and free of highly reflective surfaces.
- When inert-gas metal-arc welding is being performed on stainless steel, the requirements of PPE shall be met to protect against dangerous concentrations of nitrogen dioxide.

Welding, cutting, and heating, not involving conditions or materials described in the above paragraphs, may normally be done without mechanical ventilation or respiratory protective equipment, but where, because of unusual physical or atmospheric conditions, an unsafe accumulation of contaminants exists, suitable mechanical ventilation or respiratory protective equipment shall be provided.

Employees performing any type of welding, cutting, or heating shall be protected by suitable eye protective equipment in accordance with the requirements of section 21 of this Safety Program.

30. FIRE PROTECTION & PREVENTION

In accordance to PART 1926.150 of OSHA Regulations (Standards – 29 CFR), ATX Environmental Solutions, LLC shall be responsible for the development of a fire protection program to be followed throughout all phases of the construction and demolition work, and he shall provide for the firefighting equipment as specified in this subpart. As fire hazards occur, there shall be no delay in providing the necessary equipment. It is the responsibility of ATX Environmental Solutions, LLC, the jobsite, and all other applicable contractors to make sure the following fire safety and prevention guidelines are met:

Access to all available firefighting equipment shall be maintained at all times.

All firefighting equipment, provided by ATX Environmental Solutions, LLC, shall be conspicuously located.

All firefighting equipment shall be periodically inspected and maintained in operating condition. Defective equipment shall be immediately replaced.

As warranted by the project, ATX Environmental Solutions, LLC shall provide a trained and equipped firefighting organization (Fire Brigade) to assure adequate protection to life.

A temporary or permanent water supply, of sufficient volume, duration, and pressure, required to properly operate the firefighting equipment shall be made available as soon as combustible materials accumulate. Where underground water mains are to be provided, they shall be installed, completed, and made available for use as soon as practicable.

A fire extinguisher, rated not less than 2A, shall be provided for each 3,000 square feet of the protected building area, or major fraction thereof. Travel distance from any point of the protected area to the nearest fire extinguisher shall not exceed 100 feet.

One 55-gallon open drum of water with two fire pails may be substituted for a fire extinguisher having a 2A rating.

A 1/2-inch diameter garden-type hose line, not to exceed 100 feet in length and equipped with a nozzle, may be substituted for a 2A-rated fire extinguisher, providing it is capable of discharging a minimum of 5 gallons per minute with a minimum hose stream range of 30 feet horizontally. The garden-type hose lines shall be mounted on conventional racks or reels. The number and location of hose racks or reels shall be such that at least one hose stream can be applied to all points in the area.

One or more fire extinguishers, rated not less than 2A, shall be provided on each floor. In multistory buildings, at least one fire extinguisher shall be located adjacent to stairway.

Extinguishers and water drums, subject to freezing, shall be protected from freezing.

A fire extinguisher, rated not less than 10B, shall be provided within 50 feet of wherever more than 5 gallons of flammable or combustible liquids or 5 pounds of flammable gas are being used on the jobsite. This requirement does not apply to the integral fuel tanks of motor vehicles.

Carbon tetrachloride and other toxic vaporizing liquid fire extinguishers are prohibited.

Portable fire extinguishers shall be inspected periodically and maintained in accordance with Maintenance and Use of Portable Fire Extinguishers, NFPA No. 10A-1970.

Fire extinguishers which have been listed or approved by a nationally recognized testing laboratory, shall be used to meet these requirements. One hundred feet, or less, of 1 1/2-inch hose, with a nozzle capable of discharging water at 25 gallons or more per minute, may be substituted for a fire extinguisher rated not more than 2A in the designated area provided that the hose line can reach all points in the area. If fire hose connections are not compatible with local firefighting equipment, the contractor shall provide adapters, or equivalent, to permit connections.

During demolition involving combustible materials, charged hose lines, supplied by hydrants, water tank trucks with pumps, or equivalent, shall be made available.

If the facility being constructed includes the installation of automatic sprinkler protection, the installation shall closely follow the construction and be placed in service as soon as applicable laws permit following completion of each story.

During demolition or alterations, existing automatic sprinkler installations shall be retained in service as long as reasonable. The operation of sprinkler control valves shall be permitted only

by properly authorized persons. Modification of sprinkler systems to permit alterations or additional demolition should be expedited so that the automatic protection may be returned to service as quickly as possible. Sprinkler control valves shall be checked daily at close of work to ascertain that the protection is in service.

In all structures in which standpipes are required, or where standpipes exist in structures being altered, they shall be brought up as soon as applicable laws permit, and shall be maintained as construction progresses in such a manner that they are always ready for fire protection use. The standpipes shall be provided with Siamese fire department connections on the outside of the structure, at the street level, which shall be conspicuously marked. There shall be at least one standard hose outlet at each floor.

An alarm system, e.g., telephone system, siren, etc., shall be established by ATX Environmental Solutions, LLC whereby employees on the site and the local fire department can be alerted for an emergency.

The alarm code and reporting instructions shall be conspicuously posted at phones and at employee entrances.

Fire walls and exit stairways, required for the completed buildings, shall be given construction priority. Fire doors, with automatic closing devices, shall be hung on openings as soon as practicable.

Fire cutoffs shall be retained in buildings undergoing alterations or demolition until operations necessitate their removal.

In addition to the above guidelines, ATX Environmental Solutions, LLC agrees to follow the set guidelines for fire safety and prevention as outlined by OSHA regulations. Any employee or supervisor who fails to comply with these guidelines is subject to disciplinary action as outlined in section 18 of this Safety Program.

31. VEHICLE SAFETY & POWERED MATERIAL HANDLING EQUIPMENT

All vehicles, including private and company cars/trucks, golf carts, bicycles and other modes of transportation, shall be operated safely. Drivers of vehicles shall obey all traffic signs including stop signs, yield signs, speed limit signs and parking signs. Vehicles must only park in authorized, designated areas. Violations of vehicle safety are grounds for dismissal from the work site and disciplinary action. Pedestrians have the right of way and all divers will yield to pedestrian traffic. Seat belts are to be worn by all passengers in vehicles where the manufacturer provides seat belt equipment. All regulatory signs must be obeyed at all times. Shut off engine to fuel and use secondary containment pan while fueling to prevent secondary spills to the environment. Personnel shall not ride in the bed of a vehicle at any time. Powered material handling equipment shall be inspected and the inspection documented prior to use on each shift.

Vehicles must be inspected prior to each use; Documentation of inspection shall be located on the material at all times.

32. BARRICADING & SIGNAGE

ATX provides all necessary barricades, safety signs, stanchions, safety cones or safety warning tape as required to isolate/protect unsafe work areas from workers, pedestrians, or vehicle safety (when not in _____ fab). _____ provides all barricade materials used inside the fab/cleanroom areas. Barricading shall completely enclose the unsafe area. ATX is responsible for posting appropriate signage with our name, contact, and duration of the barricade and reasons for the barricade. (Must use applicable _____ format for this signage when necessary.) After completing the work and the hazard has been eliminated, all barricading and signage shall be removed. The following barricading warning tape should be used for the applicable hazard category:

> Yellow Tape: Occupational Hazard. Proceed with caution after the hazard has been identified, i.e. trip hazards.
> Red Tape: High or Imminent Hazard, IDLH. Do not cross! If access is required, coordinate with contact person identified on signage. Examples of this are electrical energized work in progress, overhead suspended load, high-pressure test, etc. Additional _____ barricading rules are available from _____ EHS and should be used when necessary.

- *Hole Barricading*

Perimeter for Tool Barricade – A barricade shall be put around a tool when it is set. A sign shall be placed on the barricade indicating tool ID, tool owner, and phone number. The barricade shall be removed once the tool passes _____ SL2 inspection. Bumble bee poles with yellow chains or cones with yellow tape can be used to construct a tool barricade. Do not use a combination of these. The main purpose of the barricade is to act as a safety warning. This is placed six feet from any holes created inside its perimeter. If removing tiles inside a tool barricade, additional procedures and barriers shall be used. The tool barricade along is not sufficient.

- *Single Tile Removed*

A three-sided rigid barricade is required around a single tile opening as long as there is active work being done on it. If there is no active work being done in a tile opening, then the tile shall be covered. The rigid barricade around a single tile opening can be constructed using Brady Boys or a tile cage. If lifting a clear tile to make an adjustment, no barricade is needed as long as the tile stays in contact with the frame. A hole shall never be left unattended. The tile shall always be put back in place before leaving the area.

- *Multiple Tiles Removed*

A barricade shall always be in place when more than one tile is open and work is being performed. This shall be a rigid barricade made of Versa Guards. If no work is being done, the tiles shall be put back in place. Holes shall NEVER be left unattended.

- *Multiple Holes for Future Tool Installs*

Any hole that is greater than 2 inches in its least dimension are covered. Sheet covers shall cover entire hole with no seams over the hole. Only versa guards are used for barricading around a tool area with open holes. The perimeter is at least one foot from the nearest hole. Even with the versa guard around the perimeter, open holes are always covered with Teflon or metal sheeting and taped to the floor. Brady Boys shall be placed over holes larger than 12x12 inches even if the hole is covered with a plastic cover.

33. CONFINED SPACE

ATX's Confined Space Program shall be in accordance with PART 1926.21 of OSHA Regulations (Standards – 29 CFR) as well as the policies and procedures set forth in the _____ EHS Rules and Information manual. All employees required to enter into confined or enclosed spaces shall be instructed in the nature of the hazards involved, the necessary precautions to take, and in the use of protective and emergency equipment required. ATX shall comply with any specific regulations that apply to work in dangerous or potentially dangerous areas. "Confined or enclosed space" means any space having a limited means of egress, which is subject to the accumulation of toxic or flammable contaminants or has an oxygen deficient atmosphere. Confined or enclosed spaces include, but are not limited to: storage tanks, process vessels, bins, boilers, ventilation or exhaust ducts, sewers, underground utility vaults, tunnels pipelines, and open top spaces more than 4 feet in depth such as pits, tubs, vaults, and vessels. Each confined space entry requires a restricted work permit (RWP) as well as a Confined Space Pre-Entry Plan and Post-Entry Review. These permits and plans must be approved by an authorized person prior to the start of work. Proper PPE must be worn in accordance with the RWP and pre-entry plan while working in confined spaces and may include a lifeline and harness. ATX provides confined space entry training to all employees which is then documented accordingly.

34. HAZARD COMMUNICATION (HAZCOM) PROGRAM

In order to comply with 29 CFR 1910.1200, the following written Hazard Communication Program (HCP) is implemented for personnel of ATX. The purpose of the program is to establish uniform rules and regulations throughout the company to educate all employees in the safe handling of hazardous chemicals in their work area and to educate them on any inherent dangers

these chemicals may possess. This program is available to all employees upon hiring and a copy will be supplied to any employee upon request.
The program will be updated when new chemicals or hazards are introduced into the working environment and reviewed annually.

The Safety Manager(s) and Safety Representative(s) will assure all chemical purchase requests have Material Safety Data Sheets (MSDS) requested prior to processing. All chemicals in use must have a Material Safety Data Sheet available. The _____ project sponsor shall furnish, upon request, all MSDS's to ATX prior to the start of work with or around any chemicals present at _____.

It is the policy of ATX to provide a safe and healthful working place for all employees. The company has recognized the duty to take every reasonable effort to remove chemical hazards from the work place, and when this is not possible, to make every operation involving a hazardous chemical as risk free as possible. In this regard, every employee whose job involves handling hazardous chemicals will be thoroughly informed of the chemical hazards and trained to perform his/her job in a safe manner.

It is the responsibility of each supervisor to be aware of the provisions of the OSHA Hazard Communication Standard as well as to seek reasonable alternatives to the use of hazardous chemicals in their work area. It is the responsibility of each supervisor to implement this policy and ensure compliance in all areas. Managers and supervisors will accept the administration and enforcement of this program as an operational responsibility.

It is the responsibility and duty of each employee to comply with the safety and health standards promulgated under this program and the applicable rules and regulations.

A. Container Labeling
It is the responsibility of the Safety Manager and Safety Representative to make sure all containers of hazardous chemicals entering the work place are properly labeled with:

- Chemical name
- Hazard Warnings
- Name and address of the manufacturer, importer, or responsible party

If an employee notices a chemical container that has not been properly labeled, it is their responsibility to notify their supervisor immediately. If the chemical is to be transferred to a separate container, the new container must be properly labeled with an extra copy of the manufacturer's label or with a generic label, which has a block for identity and blocks for the hazard warning. Each container will be labeled, tagged, or marked with the identity of hazardous chemicals contained and must show hazard warnings appropriate for employee protection. The label must be cross-referenced with the Material Safety Data Sheet. The hazard warning can be in the form of words, pictures, or symbols, which convey the hazards of the chemical(s) in the container.

The Safety Manager and Safety Representatives are responsible for reviewing the labeling system annually and updating as required.

All employees will be trained in reading and interpreting the container, transfer pipes, and hose labels.

B. Material Safety Data Sheets (MSDS)
The Safety Manager and Safety Representatives will be responsible for obtaining and maintaining the MSDS system for ATX. The Safety Manager and Safety Representatives will review all incoming data sheets for new and significant health/safety information and will ensure new information is given to the affected employees. Copies of the MSDS will be kept by the Safety Manager and Safety Representatives and reviewed annually for accuracy of the MSDS as part of the annual HCP annual review process.

THE MATERIAL SAFETY DATA SYSTEM SHALL INCLUDE:

- The current Master Inventory List of all MSDS indexed by number to the MSDS referenced on the inventory list.
- The identity used on the MSDS shall be the same as used on the container label.
- The Chemical or Common Name of all ingredients determined to present a hazard shall appear on all MSDS.

THE MSDS SHALL LIST:

- The physical and chemical characteristics of the chemical, including vapor pressure, flash point, etc.
- The fire, explosion, and reactivity hazards of the chemical mixture including the boiling point, flash point, and auto-ignition temperature.
- Health hazards of the chemical mixture, including signs and symptoms of exposure, and medical conditions recognized as aggravated by exposure with primary routes of entry permissible exposure limits (PEL) or any other exposure limit used or recommended by the manufacturer, importer or employer.
- Whether it is on carcinogen listing (NTP) or has been found to be a potential carcinogen (IARC listing) by OSHA.
- Control measures including fire, engineering, personal protective equipment.
- General precautions for safe handling and use including protective measures during repair and maintenance and procedures for clean-up of spills and leaks.
- Emergency and first aid procedures.
- Date prepared or changed.
- Name, address, telephone numbers of manufacturer, importer, or responsible party to call in an emergency.

The MSDS will also be part of the HCP for use by the employees. All MSDS will be maintained in a Chemical MSDS Inventory Notebook and will be cross referenced to the chemical inventory

list contained as part of this program and to the labels on the hazardous chemical container, piping or hose.

No new chemicals shall be used until the MSDS has been obtained, reviewed by the Safety Manager and Safety Representatives, and appropriate employee training provided.

C. HCP Employee Training

Before starting work, the respective supervisor of a new employee will go over their copy of the Hazard Communication Program (HCP) and each MSDS applicable to the new employee's job. Before any new chemical is used, all employees will be informed of its use, will be instructed on safe use, and will be trained on hazards associated with the new chemical. All employees will attend additional training, as appropriate, to review the HCP and MSDS.

BASIC ORIENTATION AND TRAINING FOR NEW EMPLOYEES:

- Overview of the requirements contained in the Hazard Communication Standard, 29 CFR 1910.1200.
- Chemicals present in their work place.
- Location and availability of the HCP.
- Physical and health effects of the hazardous chemicals listed on the chemical inventory lists.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work place.
- Methods to lessen or prevent exposure to these hazardous chemicals through use of control/work practices and personal protective equipment.
- Steps taken by ATX Environmental Solutions, LLC to lessen or prevent exposure to chemicals listed on the inventory list.
- Emergency procedures to follow if exposed to any of the chemicals.
- Location of the MSDS file and hazardous chemical inventory list.

Prior to a new chemical hazard being introduced into any section of the work place, each employee will be given information and training as outlined above. The Safety Manager and Safety Representatives are responsible for ensuring all new chemicals have an MSDS available and have been reviewed through training of employees, if necessary, prior to its introduction in the work place.

After attending the training class, each employee will sign a form to verify that they have attended the training, that the written HCP was made available for review and that they understand the HCP.

Chemical First-Aid – _____ Policy

The following are general chemical first-aid guidelines. In the event of chemical exposure to personnel, always notify _____ security control at 672-1911 (or just ext. 1911 if calling from a _____ phone) and refer to the applicable MSDS for additional instructions.

Inhalation:

- Remove to fresh air
- Seek medical attention with onsite _____ nurse
- Perform CPR if necessary (only by trained individuals)

Skin and Eye Contact:

- Flush eyes and/or skin with water for at least 20 minutes (remove contaminated clothing).
- Seek medical attention with onsite nurse

Ingestion

- Seek follow-up medical attention with onsite nurse
- Read label and/or MSDS
- Induce vomiting only if directed to do so

35. LOCKOUT/TAGOUT (LOTO) - Hazardous Energy Control

In accordance with PART 1910.147 of OSHA Regulations (Standards – 29 CFR), ATX's LOTO program covers the servicing and maintenance of machines and equipment in which the unexpected regeneration or start-up of the machines or equipment, or release of stored energy, could harm employees. This standard establishes minimum performance requirements for the control of such hazardous energy. The ATX lockout/tagout procedures establish minimum requirements necessary to ensure that energy and hazardous materials are controlled in such a way as to prevent injury to personnel. All lockouts and tagouts will be assessed and performed by a trained, authorized person. Lockouts will be used whenever possible. If a lockout is not possible, a tagout will be used in its place. A restricted work permit (RWP) is required whenever work must be performed on machinery or equipment where LOTO is applicable. Only trained, authorized personnel are able to perform said work. ATX also agrees to follow policies and procedures set forth in the _____ Energy Control Program.

36. PERSONAL PROTECTIVE EQUIPMENT (PPE)

In accordance to PART 1910.132 of OSHA Regulations (Standards – 29 CFR), protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory 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 manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

All personal protective equipment shall be of safe design and construction for the work to be performed.

ATX 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, ATX 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; communicate selection decisions to each affected employee; and, select PPE that properly fits each affected employee.

ATX shall provide training to each employee who is required by this section to use PPE. Each such employee shall be trained to know when PPE is necessary; what PPE is necessary; how to properly don, doff, adjust, and wear PPE; the limitations of the PPE; and, the proper care, maintenance, useful life and disposal of the PPE. Each affected employee shall demonstrate an understanding of the training and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

ATX shall retrain each such employee when ATX has reason to believe that any affected employee who has already been trained does not have the understanding and skill required.. Circumstances where retraining is required include, but are not limited to, situations where changes in the workplace render previous training obsolete; or changes in the types of PPE to be used render previous training obsolete; or inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.

ATX 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 the subject of the certification.

PPE Types and Requirements

1. Gloves
   It is the responsibility of ATX to ensure every employee is familiar with Glove PPE protocol as stated by the _____ specific safety manual. Protective gloves shall be worn for hand protection when the PTP indicates the hands are exposed to potential injury due to cuts, abrasions, or splinters. Different exposures require the use of different types of gloves.
   - Energized Electrical Work: Rated rubber gloves with leather protectors
   - Welding Operations: Gauntlet type leather welding gloves
   - Grinding Operations: Tight fitting leather gloves
   - Sharp edges and metal burrs: Cut-resistant gloves
   - Utility knives: Cut-resistant gloves
   - Concrete work: Rubber or leather gloves
   - Petroleum products/hazardous materials: Chemical resistant gloves per MSDS
   - Cut resistant clean room gloves

2. Hard Hats
   It is the responsibility of ATX to ensure every employee is familiar with Hard Hat PPE protocol as stated by the _____ specific safety manual. The manual states the following:

   Hard hats are to be worn in all construction areas unless otherwise communicated or posted. No class C or metallic hard hats are allowed. Before each use, hardhats shall be inspected for cracks, signs of impact or rough treatment and wear that might reduce the degree of safety originally provided. If signs of excess wear exist, the hardhat shall be discarded and replaced. Hardhat suspensions shall never be altered. Hardhats are to be worn with the bill to the front and never worn backwards. If face protection or face shields are required to be worn in addition to head protection, face shields shall be provided that can be worn with the hardhat. Objects shall not be placed or stored between the hardhat shell and suspension. Hats that interfere with the fit of the hardhat suspension system (i.e. baseball caps) shall not be worn under the hardhat. Tight fitting welders' caps (beanies) or stocking caps are approved for use under hardhats. Baseball type hats with the button on top shall not be worn under the hardhat. Bump caps are prohibited as head protection except when performing detail work on the interior of a fab or tool or when working below the raised metal floor (RMF) and in Catwalks and Pipe Racks where there are no hazards present from items falling from above. The intent of a bump cap is to allow workers to have protection against bumps, scrapes, punctures when there is no potential to be struck by items falling from above; The bump cap provides no protection from falling items.

3. Eye and Face
   It is the responsibility of ATX to ensure every employee is familiar with Eye and Face PPE protocol as stated by the _____ specific safety manual. The manual states the following:

   Prior to work in any area with potential exposure to hazardous materials/chemicals, the nearest eyewash will be identified and communicated to all persons onsite. All workers shall wear approved eye protection at all times while on the jobsite unless otherwise communicated or posted. Special eye hazard work areas (such as welding, torch work, etc.) will be identified in PTPs and appropriate eye protection provided. Goggles will be worn if the potential for overhead particles or chemical splash hazards exist. Goggles will also be worn for overhead protection from particles/dust. Tinted eye protection is not allowed inside facilities/structures unless specifically required and approved by project management. Visitors to the site that do not have approved eyewear shall be provided

with approved goggles or glasses. ANSI approved eyewear will be worn over prescription glasses for access to site work areas until permanent protective eyewear can be obtained. Face shields shall be worn when grinding, for overhead drilling (anchor drilling) and handling acids or molten materials.

4. Body
   It is the responsibility of ATX to ensure every employee is familiar with Body PPE protocol as stated by the _____ specific safety manual. The manual states the following:

   Where chemical hazards (corrosives, etc.) are present, appropriate protection shall be provided. The protection shall be chosen to be resistant to the hazards and chemical properties as presented by the work. Reusable clothing shall be decontaminated prior to storage or reuse. The neck and face will be suitably covered/protected from arc burns when welding. For all construction sites, workers are required to wear long pants and shirts with sleeves. Project management will approve exceptions.

5. Feet and Toes
   It is the responsibility of ATX to ensure every employee is familiar with Foot and Toe PPE protocol as stated by the _____ specific safety manual. The manual states the following:

   All personnel shall wear sturdy, non-porous work shoes/boots unless otherwise documented and/or posted. For personnel required to repetitively handle loads in excess of 30 pounds (11kg), steel-toed safety boots/shoes are required. All personnel conducting tamping and air hammering processes will wear metatarsal guards and steel-toed shoes. Athletic style shoes (tennis shoes), even if they are steel toe, are not permitted. The use of steel-toed safety shoes/boots and/or metatarsal guards will be defined in the project plan or PTP.

6. Hearing
   It is the responsibility of ATX to ensure every employee is familiar with Hearing PPE protocol as stated by the _____ specific safety manual. The manual states the following:

   Earplugs are provided at the jobsite and should be worn when/if defined in project plan or PTP.

7. Respiratory Protection
   It is the responsibility of ATX to ensure every employee is familiar with Respiratory Protection PPE protocol as stated by the _____ specific safety manual. The manual states the following:

   A respirator shall be provided to each employee when such equipment is necessary to protect the health of the employee. ATX shall provide the respirators, which are applicable and suitable for the purpose intended. ATX is also responsible for training employees who are required to use respirators on proper use and maintenance of respirators. ATX will maintain written records documenting this training when applicable. Respirators shall not be shared and must be formally cleaned and disinfected between uses. Anyone wearing a respirator shall be clean-shaven to ensure a secure face/respirator seal.

37. HOUSEKEEPING

ATX shall clean up and haul away trash, scrap, excess material, and other debris from the work area DAILY or as needed throughout the shift if it creates a hazard or blocks egress. Housekeeping duties include:

- Store paint rags, oil rags, and flammable liquids in approved containers provided on the jobsite.
- Replace all removed ceiling tiles as soon as necessary work is completed.
- Remove all hazardous waste in accordance with _____ policies and coordinated through _____ EHS while on the jobsite.
- Support all temporary cords or hoses belonging to contractors at least 6 feet-6 inches above the floor or taped to the floor and properly marked with safety signs.
- Carefully stack and locate material so that it does not block aisles, doors, emergency or safety equipment, or fixed ladders or stairways, unless specifically authorized.
- Remove or bend nails protruding from boards
- Clear forms, scrap lumber, and other debris from work areas.
- Prohibit overhead storage of debris, tools, equipment, etc.
- Store any loose material carefully and in onsite approved areas.
- Prohibit material storage within 18 inches of sprinkler heads.
- Dispose of all waste materials in properly labeled waste containers.

38. CONCLUSION & CONTACT

The goal is to stop accidents before they happen, by taking steps to eliminate the causes of accidents. Approaches to loss control not only save employees from injury and lost time, but also pay large dividends to business with lower hidden accident costs, higher employee morale and more efficient operations.

ATX Environmental Solutions, LLC is committed to the safety and health of our personnel. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health in keeping with the highest standards, as outlined in this safety program.

For questions or concerns regarding this safety program, please contact our administrative offices at 1205 Sheldon Cove, Suit 1-K, Austin TX 78753; 512-452-2701 or e-mail Lori Wood at lori.wood@atxesl.com.